

# NPDES MS4 Annual Report

version 1.8

(Submission #: HQ6-WQJG-ZH48H, version 1)

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## Details

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**Submission ID** HQ6-WQJG-ZH48H

**MS4 Owner Name** City of Brownsville

## Form Input

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### General Information

**Permit Number**

TNS075191

**MS4 Owner/Operator (e.g. City of ...)**

City of Brownsville

**County**

Haywood

**Reporting Period**

Per subpart 5.1

- a. The Annual Report shall cover the period beginning on July 1st and ending on June 30th;
- b. The Annual Report shall be due on September 30th after the end of the reporting period.

**Reporting Period Start Date**

07/01/2023

**Reporting Period End Date**

06/30/2024

**MS4 Population At NOI Submittal**

10,001 = Population = 25,000

**Name and contact information of MS4 Responsible Authority (e.g. Mayor ...)**

**Prefix**

Hon.

**First Name      Last Name**

Bill                      Rawls

**Title**

City Mayor

**Company Name**

City of Brownsville

**Phone Type      Number              Extension**

Business          731-772-1212

**Email**

wrawls@brownvilletn.gov

**Address**

15 E MAIN ST  
BROWNSVILLE, TN 38012

**Designated MS4 Stormwater Management Program Contact**

**Prefix**

Mr.

**First Name      Last Name**

Caleb                  Potter

**Title**

Storm Water Manager

**Company Name**

City of Brownsville

**Phone Type    Number                  Extension**

Business          731-432-3815

**Email**

cpotter@brownsvilletn.gov

**Address**

15 E MAIN ST  
BROWNSVILLE, TN 38012

**MCM 1: Public Education**

Below report on the educational activities completed during the reporting year. Delete unused rows (click X at end of row). Add rows (add row button on bottom of table) to report add activities.

**Provide the number of activities completed during the reporting year for the Public (Subpart 4.2.1.1. of the permit).**  
3

**Provide the number of activities completed during the reporting year for the Engineering and Development Community (Subpart 4.2.1.2. of the permit).**  
2

In the Permit, the question below is phrased "How many employees (that are new to the MS4 or new to the job category) have NOT been educated in accordance with the in accordance with the permit sub-part 4.2.1.3 within 6 months?" In order to make this calculation, count how many employees are new to the MS4 or their Job Category. Subtract the number of employees that were trained in accordance with the PIE plan within 6 months. That result is what is reported in this field. If no employees with applicable job categories/responsibilities hired in this reporting cycle, enter 0.

**For new employees: provide the total number of employees NOT educated in accordance with the PIE plan within 6 months?**  
0

**For existing employees: provide the total number of employees NOT educated in accordance with the PIE plan within the permit term.**  
0

A population of 10,001 = Population = 25,000 at NOI submittal was selected in the General Information Section. Per Subpart 4.2.1.1. the MS4 is required to conduct one (1) activity during the reporting year addressing each of the four (4) management measures for the public. A single activity may address multiple management measures.

You may need to use the scroll bars to view the whole table.

To Add a Row - Click Add Row near the bottom right of the table

To Delete a Row - Click the "X" at the far right end of the row.

**Column Descriptions**

Target Audience (This column is fixed and cannot be changed.)

Activity Description: (Provide details as to the specific activity that was conducted.)

Management Measure: Impacts on Water Quality (Select Yes if the activity listed in this row addressed the 4.2.1.1.a.General awareness of the impacts on water quality.)

Management Measure: SCM/BMP Maintenance (Select Yes if the activity listed in this row addressed the 4.2.1.1.b. Awareness of the importance of maintenance activities for operators of permanent Best Management Practices (BMPs)/Stormwater Control Measures (SCMs).)

Management Measure: Storage, Use, Disposal of Fluids (Select Yes if the activity listed in this row addressed the 4.2.1.1.c. Awareness of the proper storage, use, and disposal of pesticides, herbicides, fertilizers oil and other automotive-related

fluids.)

Management Measure: Illicit Discharges (Select Yes if the activity listed in this row addressed the 4.2.1.1.d. Awareness of identifying and reporting procedures for illicit connections/discharges, sanitary sewer seepage, spills, etc.)

Date of Activity (Enter the date the activity took place. If the activity took place across multiple days enter the Date of the first day of the activity.)

Specifically Targeted Audience (This column is used to provide more details as to the audience the activity was targeting e.g. school age children, Homeowners with SCMs) A broad based event such as tabling at a festival may list general public as the specifically targeted audience.

# of Audience (Enter the approximate number of individuals that were reached with this activity.)

Sponsored Activities (Identify if the event sponsored monetarily e.g. money or as a donation in kind e.g. goods or services by the MS4 program. If it was not a sponsored activity, leave N/A in the cell.)

**Provide the status of your MS4 programs public education and outreach activities for the Public audience during the reporting period.**

Target Audience	Activity Description	Management Measure: Impacts on Water Quality	Management Measure: SCM/BMP Maintenance	Management Measure: Storage, Use, Disposal of Fluids	Management Measure: Illicit Discharges	Date of Activity	Specifically Targeted Audience	# of Audience	Sponsored Activities
Public	Boys and Girls Club of Brownsville at Shelby Forest	Yes	No	Yes	Yes	07/14/2023	Young adults	20	N/A
Public	Hatchie Fall Fest	Yes	Yes	Yes	Yes	10/21/2023	General Public	108	N/A
Public	Brownsville Fishing Trip	Yes	No	Yes	Yes	06/14/2024	Youth	20	N/A

A population of 10,001 = Population = 25,000 at NOI submittal was selected in the General Information Section. Per Subpart 4.2.1.2. the MS4 is required to conduct two (2) activities during the permit term addressing each of the two (2) management measures for the Engineering and Development Community. A single activity may address multiple management measures.

You may need to use the scroll bars to view the whole table.

To Add a Row - Click Add Row near the bottom right of the table

To Delete a Row - Click the "X" at the far right end of the row.

**Column Descriptions**

Target Audience (This column is fixed and cannot be changed.)

Activity Description: (Provide details as to the specific activity that was conducted.)

Management Measure: Long Term Water Quality Impacts (Select Yes if the activity listed in this row addressed the 4.2.1.2.a Awareness of the stormwater ordinances, regulations, and guidance materials related to long-term water quality impacts.)

Management Measure: Construction Water Quality Impacts (Select Yes if the activity listed in this row addressed the 4.2.1.2.b. Awareness of stormwater ordinances, regulations, and guidance materials related to construction phase water quality impacts.)

Date of Activity (Enter the date the activity took place. If the activity took place across multiple days enter the Date of the first day of the activity.)

Specifically Targeted Audience (This column is used to provide more details as to the audience the activity was targeting e.g. restaurants, Engineers, Developers ) A broad based event such as tabling at a local trade show may list commercial and development community as the specifically targeted audience.

# of Audience (Enter the approximate number of individuals that were reached with this activity.)

**Provide the status of your MS4 programs public education and outreach activities for the Engineering and Development Community during the reporting period.**

Target Audience	Activity Description	Management Measure: Long Term Water Quality Impacts	Management Measure: Construction Water Quality Impacts	Date of Activity	Specifically Targeted Audience	# of Audience
Engineering and Development Community	COE Presentation on Permitting	Yes	Yes	09/06/2023	Developers and Designers	4
Engineering and Development Community	SCM Design and Maintenance	Yes	Yes	09/06/2023	Developers and Designers	4

**Supporting Documentation for Activities described in this section.**

NONE PROVIDED

**Comment**

NONE PROVIDED

**Notes:**

NONE PROVIDED

**MCM 2: Public Involvement And Participation**

Below report on the involvement/participation activities completed during the reporting year. Delete unused rows (click X at end of row). Add rows (add row button on bottom of table) to report add activities.

**Is your Stormwater Management Program Plan documentation available online?**

Yes

**Provide the web address for the Stormwater Management Program plan documentation**

<https://brownsvilletn.gov/storm-water/>

**Was the MS4 program documentation formally placed on public notice during the reporting year?**

Yes

**Provide a copy of the public notice and response to comments.**

[240927 BSW Public Notice.jpeg - 09/30/2024 02:41 PM](#)

**Comment**

No comments received.

Subpart 4.2.2. requires the following in the annual report

Detail applicable changes as directed in subpart 4.4.1

This requirement will be located in the Program Modifications Section

**Is information for all construction site projects accessible to the public?**

Yes

**Number of comments received from the public on construction site projects.**

0

**Are all comments from the public on construction site projects considered?**

Yes

**Number of reports (or complaints) during the reporting period received from the public via public reporting system (IDDE reports)?**

0

**Provide the number of activities completed during the reporting year for the General Public (Subpart 4.2.2.1. of the permit).**

1

**Provide the number of activities completed during the reporting year for the Commercial and Development Community (Subpart 4.2.2.2. of the permit).**

1

A population of 10,001 = Population = 25,000 at NOI submittal was selected in the General Information Section. Per Subpart 4.2.2.1. the MS4 is required to conduct one (1) activity during the reporting year addressing each of the four (4) management measures for the general public. A single activity may address multiple management measures.

You may need to use the scroll bars to view the whole table.

To Add a Row - Click Add Row near the bottom right of the table

To Delete a Row - Click the "X" at the far right end of the row.

### Column Descriptions

Target Audience (This column is fixed and cannot be changed.)

Activity Description: (Provide details as to the specific activity that was conducted.)

Management Measure: Pollution Prevention (Select Yes if the activity listed in this row addressed the 4.2.2.1.a Pollution Prevention Management Measure.)

Management Measure: Impacts on Water Quality (Select Yes if the activity listed in this row addressed the 4.2.2.1.b. Impacts on water quality or local stormwater management issues.)

Management Measure: Storage, Use, Disposal of Fluids (Select Yes if the activity listed in this row addressed the 4.2.2.1.c. Storage, use, and disposal of household hazardous waste, automotive related fluids, pesticides, herbicides, and fertilizers use.)

Management Measure: Illicit Discharges (Select Yes if the activity listed in this row addressed the 4.2.2.1.d. Identifying and reporting procedures for illicit connections/discharges, sanitary sewer seepage, spills, etc.)

Date of Activity (Enter the date the activity took place. If the activity took place across multiple days enter the Date of the first day of the activity.)

Specifically Targeted Audience (This column is used to provide more details as to the audience the activity was targeting e.g. school age children, Homeowners with SCMs) A broad based event such as tabling at a festival may list general public as the specifically targeted audience.

# of Audience (Enter the approximate number of individuals that were reached with this activity.)

Sponsored Activities (Identify if the event sponsored monetarily e.g. money or as a donation in kind e.g. goods or services by the MS4 program. If it was not a sponsored activity, leave N/A in the cell.)

**Provide the status of your MS4 program's public involvement/participation activities for the General Public audiences during the reporting period.**

Target Audience	Activity Description	Management Measure: Pollution Prevention	Management Measure: Impacts on Water Quality	Management Measure: Storage, Use, Disposal of Fluids	Management Measure: Illicit Discharges	Date of Activity	Specifically Targeted Audience	# of Audience	Sponsored Activities
General Public	Model Display Boy and Girls Club	Yes	Yes	Yes	Yes	10/24/2023	Youth	38	N/A

A population of 10,001 = Population = 25,000 at NOI submittal was selected in the General Information Section. Per Subpart 4.2.2.2. the MS4 is required to conduct two (2) activities during the permit term addressing each of the two (2) management measures for the Commercial and Development Community. A single activity may address multiple management measures.

You may need to use the scroll bars to view the whole table.

To Add a Row - Click Add Row near the bottom right of the table

To Delete a Row - Click the "X" at the far right end of the row.

### Column Descriptions

Target Audience (This column is fixed and cannot be changed.)

Activity Description: (Provide details as to the specific activity that was conducted.)

Management Measure: Pollution Prevention (Select Yes if the activity listed in this row addressed the 4.2.2.2.a Pollution Prevention Management Measure.)

Management Measure: Impacts on Water Quality (Select Yes if the activity listed in this row addressed the 4.2.2.2.b. Impacts on water quality or local stormwater management issues.)

Date of Activity (Enter the date the activity took place. If the activity took place across multiple days enter the Date of the first day of the activity.)

Specifically Targeted Audience (This column is used to provide more details as to the audience the activity was targeting e.g. restaurants, Engineers, Developers ) A broad based event such as tabling at a local trade show may list commercial and development community as the specifically targeted audience.

# of Audience (Enter the approximate number of individuals that were reached with this activity.)

Provide the status of your MS4 programs public involvement/participation activities for the Commercial and Development Community during the reporting period.

Target Audience	Activity Description	Management Measure: Pollution Prevention	Management Measure: Impacts on Water Quality	Date of Activity	Specifically Targeted Audience	# of Audience
Commercial and Development Community	"Gabions & Aquarocks" (Jackson)	Yes	Yes	11/15/2023	Developers and Designers	15

Supporting Documentation for Activities described in this section.

NONE PROVIDED

**Comment**

NONE PROVIDED

**Notes:**

NONE PROVIDED

### MCM 3: Illicit Discharge Detection & Elimination (IDDE)

Is the storm sewer map available through Spatial Rest Services?

No

Attach Most Recent Copy of Storm Sewer Map in accordance with subpart 4.2.3

[230700 Brownsville SW Maps.pdf - 09/30/2024 02:47 PM](#)

**Comment**

NONE PROVIDED

The number of potential illicit discharges reported by the public.

0

The number of potential illicit discharges reported by internal personnel.

0

Total number of potential Illicit discharges reported (from any source) that are under investigation at the time of the annual report.

0

Number of identified illicit discharges

0

Total number of non-stormwater discharges or flows investigated.

0

#### Significant Contributor of Pollutants to the MS4

##### 1.3.3.2. Non-stormwater Discharges

The permittee is authorized to discharge the following non-stormwater sources provided that the permittee has not determined these sources to be significant contributors of pollutants to the MS4:

- Water line flushing
- Landscape irrigation
- Diverted stream flows
- Rising ground waters
- Uncontaminated groundwater infiltration (Infiltration is defined as water other than wastewater that enters a sewer system, including sewer service connections and foundation drains, from the ground through such means as defective pipes, pipe joints, connections, or manholes. Infiltration does not include, and is distinguished from, inflow.)
- Uncontaminated pumped groundwater
- Discharges from potable water sources
- Foundation drains
- Air conditioning condensate
- Irrigation water
- Springs

- Water from crawl space pumps
- Footing drains
- Lawn watering
- Individual residential car washing
- Flows from riparian habitats and wetlands
- Dechlorinated swimming pool discharges
- Street wash water
- Discharges or flows from firefighting activities

Subpart 8.1 Definitions

Significant Contributor is defined as a source of pollutants where the volume, concentration, or mass of a pollutant in a stormwater discharge can cause or threaten to cause pollution, contamination, or nuisance that adversely impact human health or the environment and cause or contribute to a violation of any applicable water quality standards for receiving water.

**MCM 4: Construction Site Stormwater Runoff Pollutant Control**

For reporting construction activities in this section, count all activities e.g., projects, sites that were active during the reporting period. It is understood that activities will overlap multiple reporting years. For example: If a project plan is submitted and reviewed in reporting year 1, that plan review will go only on the report for that year. If that same project begins construction in reporting year 2, it would be included in the year 2 report for active construction activity, but not the year 1 report. If a construction activity is terminated in the beginning of a reporting year before the first inspection for that reporting year is required, that activity may be left off the count.

**Identify if the regulatory mechanisms for construction site runoff control have been updated to be consistent with the CGP?**  
Under Development

**Please provide more details on the development process**  
The Ordinance was approved on 8/13/24.

**Please provide estimated completion date**  
08/13/2024

**Total number of active construction activities (or sites).**  
19

**Number of new development and redevelopment projects reviewed in accordance with established policies and procedures.**  
1

**Were all new development and redevelopment projects reviewed in accordance with the established policy and procedure?**  
Yes

**Number of active non-priority construction activities.**  
0

**Number of active priority construction activities.**  
19

**Total number of active non-priority construction activities with incomplete inventory information.**  
0

**Did all Priority Construction Activities have Pre-Construction meetings?**  
Yes

**Were all priority Construction Activities inspected at least once per calendar month?**  
Yes

**MCM 5: Post Construction/ Permanent Stormwater Management**

**Has an offsite mitigation program or payment in lieu into a public stormwater fund been developed as outlined in subpart 4.2.5.3.?**  
No

**Did all of the projects approved meet the buffer requirements of subpart 4.2.5.4?**  
Yes

**Does the Stormwater Management Program implement alternative buffer widths?**  
No

The 2009 scorecard can be found on TDEC's website.

[Water Quality Scorecard](#)

**Scorecard**

NONE PROVIDED

**Comment**

NONE PROVIDED

**Number of all new development and redevelopment projects reviewed.**

1

**Number of new development and redevelopment projects reviewed in accordance with the established policy and procedure.**

1

**Number of sites verified that 100% of SCMs are installed per design specifications in accordance with approved plan.**

0

**Were all SCMs verified to be installed per design specifications in accordance with approved plan within 90 days of installation?**

Yes

**Does the permittee have adequate legal authority as required by 4.2.5.7 for all SCMs installed?**

Yes

**Number of SCMs that have not been properly operated or maintained.**

0

**Number of public requests for SCM inventory.**

0

**Are all SCMs in the inventory tracking system?**

Yes

**Do all SCMs in the inventory tracking system have complete information?**

Yes

**SCM inventory tracking system information**

NONE PROVIDED

**Comment**

NONE PROVIDED

**MCM 6: Pollution Prevention/Good Housekeeping For Municipal Operations**

**Number of applicable Municipal Operations and Facilities under subpart 4.2.6.2.**

5

**Do all applicable Municipal Operations and Facilities have a O&M Facility Plan?**

Yes

**Number Municipal Operations Facilities NOT inspected in accordance with the Stormwater Management Program in the previous 12 months.**

0

**Stormwater Management Program Modification**

**Have any municipal facilities covered under this permit been added during the reporting term?**

No

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In the table below identify if any changes were made to your Stormwater Management Program during the reporting period.

For minor modifications that add, but neither subtract nor replace, components, controls, or requirements to the Stormwater Management Program provide a description of that modification. - See Subpart 4.4.1.1.a

For minor modifications that replace an ineffective or infeasible BMP, or SCM which is specifically identified in the Stormwater Management Program provide a description of the analysis of why the former BMP was ineffective or infeasible; Expectations on the effectiveness of the replacement BMP or SCM; and an analysis, if applicable, of why the replacement BMP or SCM will ensure the optimization of equipment use. a description of that modification. - See Subpart 4.4.1.1.e

For major modifications that subtract BMPs, SCMs, components, controls, or requirements of the Stormwater Management Program provide a description of the analysis of why the component was ineffective or infeasible; and detailed explanation of why, with the elimination of this component, the Stormwater Management Program will continue to achieve a reduction in pollutants to the MEP and shall not cause or contribute to violations of State water quality standards in the receiving stream. - See Subpart 4.4.1.2.a.

**Where any changes were made to the program elements during the reporting period?**

Program Elements	Changes	Modifications that Add Components	Replaced an Ineffective or Infeasible BMP or SCM	Subtracted BMP, SCM, Components, Controls etc.
MCM 1	No	NONE PROVIDED	NONE PROVIDED	NONE PROVIDED
MCM 2	No	NONE PROVIDED	NONE PROVIDED	NONE PROVIDED
MCM 3	No	NONE PROVIDED	NONE PROVIDED	NONE PROVIDED
MCM 4	No	NONE PROVIDED	NONE PROVIDED	NONE PROVIDED
MCM 5	No	NONE PROVIDED	NONE PROVIDED	NONE PROVIDED
MCM 6	No	NONE PROVIDED	NONE PROVIDED	NONE PROVIDED
QLP	N/A	NONE PROVIDED	NONE PROVIDED	NONE PROVIDED
Enforcement	No	NONE PROVIDED	NONE PROVIDED	NONE PROVIDED
Monitoring & Program Evaluation	No	NONE PROVIDED	NONE PROVIDED	NONE PROVIDED

**Other Program Changes not Identified above**

The ordinance was passed after the end of the reporting period, so several documents will be updated to be in alignment with the new Ordinance.

**Summary Of Enforcement Actions**

Note: Non-traditional MS4s may not have legal authority to enforce one or more MS4 permit requirements. For example, a university campus regulated as a MS4 permittee or co-permittee may not have the legal authority to enforce MS4 permit requirements against another entity.

**Summary of Enforcement Actions Taken during the reporting year**

Action	IDDE	Construction	Permanent Stormwater/Post-Construction	Total
Verbal Warnings	0	1	0	1
Written Notice of Violation	0	0	0	0
Citations or Administrative Orders	0	0	0	0
Stop Work Orders	0	0	0	0
Withholding of Plan Approvals or Other Authorizations	0	0	0	0
Civil Penalties	0	0	0	0
Additional Measures	0	0	0	0
				Sum: 1

**Results Of Information Collected And Analyzed (Monitoring)**

**Was monitoring for the reporting year performed in accordance with either 4.6.1.1.1 (Option 1) or 4.6.1.1.2 (Option 2)?**

No

**Provide a summary describing the results of information collected and analyzed, including monitoring data (analytical and non-analytical), if any, during the reporting period. If no monitoring was completed, explain.**

The Option 2 monitoring plan was submitted on 8/31/24 and approved on 9/11/24.

For your convenience, links to the required standard templates for reporting the results of your monitoring data are provided below. EDD Sheets (Field Stream Survey and Habitat Sheets, Macroinvertebrate Taxa Report, and the TDEC E. coli and Field Water Parameter Report) are in the section labelled Water Quality Assessment Publications as excel files.

[Publications](#)

**Legal Authority**

Per subpart 4.7.1. The initial solicitor's statement is required in the 2024 annual report for existing permittees and in the third annual report for new permittees.

If modifications are made to the legal authority that necessitate a new evaluation by a solicitor, a new certification statement must be submitted.

Per subpart 4.1.2. All updates to the legal authority (ordinances/resolutions etc.) required by changes to the permit shall be fully implemented and adopted.

**Attach a signed solicitor's certification statement.**

[240927 Solicitors Certification Brownsville\\_stormwater statement.pdf - 09/30/2024 03:29 PM](#)

**Comment**

NONE PROVIDED

In order to facilitate the review of the legal authority, please indicate if you used the 2023 MTAS MS4 Model Ordinance?

Construction Stormwater  
Illicit Discharge Detection  
Permanent Stormwater/Post-Construction

**Attach Legal Authority - Ordinances, Resolutions, etc**

[00 Brownsville Ordinance\\_StormWater Ord 2024 signed.pdf - 09/30/2024 03:30 PM](#)

**Comment**

NONE PROVIDED

**Attach Legal Authority - Enforcement Response Plan and List or Table of Progressive Enforcement Actions**

[210831 Enforcement Response Plan.pdf - 09/30/2024 03:32 PM](#)

**Comment**

The ERP is in the process of being updated since the Ordinance was recently passed.

## **Stormwater Management Program Evaluation**

### **Stormwater Management Program Evaluation**

In accordance with subpart 4.6.2. The permittee shall conduct an annual evaluation of the Stormwater Management Program to evaluate compliance with the terms and conditions of the permit, including the effectiveness of the BMPs, components, or controls of its stormwater management program, and the status of achieving the measurable requirements in the permit.

**Summarize the results of the permittee's annual evaluation of the current Stormwater Management Program.**

The program is going well. As shown in this Annual Report, the City has expanded its public outreach and participation program for both the general public and for the development community. Additionally, passage of the Ordinance and approval of the Monitoring plan sets the City in a good position to complete additional stormwater pollution prevention efforts.

**Identify modifications or replacement of an ineffective activity/control measure/component/BMP.**

None

**Summarize the assessment results, and any modifications and improvements scheduled to be implemented in the next reporting period to improve the program or remedy deficiencies or weaknesses**

The City will continue to focus on the inspections and the education and participation programs. Additionally, the City will begin implementation of the monitoring program.

**Is MCM 1: Public Education and Outreach on Stormwater Impacts compliant with Permit Requirements?**

Yes

**Is MCM 2: Public Involvement/Participation compliant with Permit Requirements?**

Yes

**Is MCM 3: Illicit Discharge Detection and Elimination (IDDE) compliant with Permit Requirements?**

Yes

**Is MCM 4: Construction Site Stormwater Runoff Control compliant with Permit Requirements?**

Yes

**Is MCM 5: Post-Construction/Permanent Stormwater Management in New Development and Redevelopment compliant with Permit Requirements?**

Yes

**Is MCM 6: Pollution Prevention/Good Housekeeping compliant with Permit Requirements?**

Yes

**Is Monitoring Program (subpart 4.6.1.1) compliant with Permit Requirements?**

Yes

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The following questions are from subpart 5.2 Annual Report Requirements.

**Is the permittee compliant with the permit terms and conditions?**

Yes

This determination should be made as to the status of the program at the end of the reporting period and the requirements applicable at that date. For example, the permanent stormwater program changes are not required to be implemented until 24 months after the effective date of the permit. So if the MS4 has not yet implemented those changes at the first annual report, they would still be in compliance, if their program meets the previously established requirements.

**Please Explain**

NONE PROVIDED

**Is the permittee relying on another governmental entity to satisfy some of the permit obligations?**

No

Enter additional or clarifying information not elsewhere reported in this document.  
NONE PROVIDED

Any other data specifically requested by the Division to substantiate statements and conclusions reached in the Annual Reports.  
NONE PROVIDED  
**Comment**  
NONE PROVIDED