

NPDES MS4 Annual Report

version 1.5

(Submission #: HPW-KCM8-0EB09, version 1)

Details

Submitted 8/31/2023 (0 days ago) by Eric Salmon

Submission ID HPW-KCM8-0EB09

MS4 Owner Name City of Clarksville

Status In Review

Active Steps Assign Technical Reviewer

Form Input

General Information

Permit Number
TNS075205

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

County
Montgomery

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

07/01/2022

Reporting Period End Date

06/30/2023

MS4 Population At NOI Submittal

Population greater than or equal to 50,001

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

Joe

Last Name*Pitts***Title***Mayor***Company Name***City of Clarksville***Phone Type**

Business

Number

931-320-1545

Extension**Email**

joe.pitts@cityofclarksville.com

Address

One Public Square, 4th Floor

Clarksville, TN 37040

Designated MS4 Stormwater Management Program Contact**Prefix***Mr.***First Name Last Name**Eric *Salmon***Title***NPDES Coordinator***Company Name***City of Clarksville - Street Department***Phone Type Number Extension**

Business 9316457464 6728

Email

eric.salmon@cityofclarksville.com

Address

199 10TH ST

CLARKSVILLE, TN 37040

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).

7

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

0

How many employees (that are new to the MS4 or new to the job category) have NOT been 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 greater than or equal to 50,001 at NOI submittal was selected in the General Information Section. Per Subpart 4.2.1.1. the MS4 is required to conduct six (6) activities 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 program’s 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
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A population of greater than or equal to 50,001 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 reporting year 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 program’s 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
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Supporting Documentation for Activities described in this section.

[Clarksville 2022-2023 Report.pdf - 08/22/2023 02:42 PM](#)

[IMG-2434.jpg - 08/22/2023 03:05 PM](#)

[IMG-2439.jpg - 08/22/2023 03:05 PM](#)

[IMG-2437.jpg - 08/22/2023 03:05 PM](#)

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[20220910_112207.jpg - 08/22/2023 03:06 PM](#)

[20220910_104119.jpg - 08/22/2023 03:06 PM](#)

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[20230317_092309.jpg - 08/22/2023 03:06 PM](#)

[20230317_102125.jpg - 08/22/2023 03:06 PM](#)

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?

No

Provide a brief description of the public records request process.

You have to fill out the public records request form and submit it.

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.Public Notice 22_23.pdf - 08/23/2023 07:35 AM**Comment**

NONE PROVIDED

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 during the reporting period received from the public via public reporting system (IDDE reports)?

21

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

7

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

0

A population of greater than or equal to 50,001 at NOI submittal was selected in the General Information Section. Per Subpart 4.2.2.1. the MS4 is required to conduct six (6) activities 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
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A population of greater than or equal to 50,001 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 reporting year 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 program’s 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
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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

Clarksville NPDES Map_082023.pdf - 08/03/2023 12:56 PM

Comment

NONE PROVIDED

The number of potential illicit discharges reported by the public.

21

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

Were all potential illicit discharges investigated within 7 days of receipt?

Yes

Number of identified illicit discharges

13

Were all initial enforcement actions on confirmed illicit discharges taken within seven (7) calendar days of the investigation?

Yes

Number of corrective actions plans received for confirmed illicit discharges.

0

Were all corrective actions plans reviewed in accordance with established procedures?

Yes

Number of non-stormwater discharges or flows identified as a significant contributor of pollutants to the MS4.

0

Total number of non-stormwater discharges or flows investigated.

0

Were all non-stormwater discharges or flows identified as a significant contributor of pollutants to the MS4 investigated?

No

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?

In Effect

Total number of active construction activities.

107

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

0

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

107

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

Were all nonpriority active construction activities inspections conducted accordance with Stormwater Management Program.

Yes

Number of active priority construction activities.

107

Did all Priority Construction Activities have Pre-Construction meetings?

Yes

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

No

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

Information on EPA's Water Quality Scorecard can be found on the EPA's website.

[Water Quality Scorecard Information](#)

The scorecard can be found on EPA's website.

[Water Quality Scorecard](#)

Scorecard

NONE PROVIDED

Comment

NONE PROVIDED

Number of all new development and redevelopment projects reviewed.

130

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

130

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

Have enforcement actions been taken in accordance with the appropriate legal authority or ERP?

No

Number of public requests for SCM inventory.

0

Are all SCMs in the inventory tracking system?

No

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

No

SCM inventory tracking system information

NONE PROVIDED

Comment

NONE PROVIDED

MCM 6: Pollution Prevention/Good Housekeeping For Municipal Operations

Number of Municipal Operations Facilities under subpart 4.2.6.2.

6

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

No

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

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	No	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

NONE PROVIDED

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	13	72	0	85

Action	IDDE	Construction	Permanent Stormwater/Post-Construction	Total
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: 85

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)?

Yes

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.

We did the non-analytical of the Little West Fork and the West Fork Red River in the month of June 2023. We did not notice any real differences from the last non-analytical.

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](#)

Attach results of all analytical and non-analytical monitoring data collected during this reporting period.

Visual Stream Assessment 2023.xlsx - 08/22/2023 03:15 PM

Comment

NONE PROVIDED

Legal Authority

Per subpart 4.7.1. The initial solicitor's statement will be 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.

Attach a signed solicitor's certification statement.

NONE PROVIDED

Comment

NONE PROVIDED

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 effectiveness of the MS4 program, on the whole, is working. The program needs more funding (aka stormwater fee) and more staffing. With the tablets the inspectors are having a better time filling out paperwork and they are able to get information out in the field a lot faster now.

With the new permit, there is a higher demand in the City. The City will need to increase the staffing and funding for the program to meet the new standards. We are working with CEC on updating the ordinance and stormwater manual to get the program set up for the new permit. We lost a director and the Mayor appointed an interim director.

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

There have not been any modifications or replacements of ineffective activity/control measure/component/BMP.

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

We are working with CEC on updating the ordinance and stormwater manual to get the program set up for the new permit.

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

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

Attachments

Date	Attachment Name	Context	User
8/23/2023 7:35 AM	Public Notice 22_23.pdf	Attachment	Eric Salmon

Date	Attachment Name	Context	User
8/22/2023 3:15 PM	Visual State Assessment 2023.xlsx	Attachment	Eric Salmon
8/22/2023 3:06 PM	20230317_092308.jpg	Attachment	Eric Salmon
8/22/2023 3:06 PM	20230317_092256.jpg	Attachment	Eric Salmon
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8/22/2023 3:05 PM	IMG-2437.jpg	Attachment	Eric Salmon
8/22/2023 2:42 PM	Clarksville 2022-2023 Report.pdf	Attachment	Eric Salmon
8/3/2023 12:56 PM	Clarksville NPDES Map 082023.pdf	Attachment	Eric Salmon

Status History

	User	Processing Status
8/2/2023 9:30:58 AM	Eric Salmon	Draft
8/31/2023 7:44:27 AM	Eric Salmon	Signing
8/31/2023 7:44:28 AM	Eric Salmon	Submitting
8/31/2023 7:45:22 AM	Eric Salmon	Submitted
8/31/2023 7:45:23 AM	Eric Salmon	In Review

Processing Steps

Step Name	Assigned To/Completed By	Date Completed
Form Submitted	Eric Salmon	8/31/2023 7:45:22 AM
Assign Technical Reviewer	Bill Murph	
EFO Technical Review		
Submission Deemed Complete		

Agreements and Signature(s)

SUBMISSION AGREEMENTS

- I am the owner of the account used to perform the electronic submission and signature.
- I have the authority to submit the data on behalf of the facility I am representing.
- I agree that providing the account credentials to sign the submission document constitutes an electronic signature equivalent to my written signature.
- I have reviewed the electronic form being submitted in its entirety, and agree to the validity and accuracy of the information contained within it to the best of my knowledge.

This report must be signed by a ranking elected official or by a duly authorized representative of that person. See signatory requirements in sub-part 7.11.2 of the permit.

"I certify under penalty of law that I have personally examined and am familiar with the information submitted in the attached document; and based on my inquiry of those individuals immediately responsible for obtaining the information, I believe the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

Signed
By Eric Salmon on 08/31/2023 at 7:44 AM