

TULLAHOMA STORMWATER MANAGEMENT PLAN

SEPTEMBER 2011



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PROGRAM DESCRIPTION

I. PURPOSE

Late in 2010, the Tennessee Division of Water Pollution Control issued the new General NPDES Permit for Small Municipal Separate Storm Sewer Systems (MS4). The City of Tullahoma applied for coverage under the Permit in December of 2010. Section 4.1 of the Permit requires all Small MS4s to document all elements of the stormwater management program in a Stormwater Management Plan (SWMP). This SWMP has been compiled to comply with this requirement of the Small MS4 Permit.

II. REGULATORY REQUIREMENTS

The Phase II Stormwater Regulations, found at 40 CFR Part 122, require the City of Tullahoma at a minimum, to develop, implement, and enforce a stormwater management program designed to reduce the discharge of pollutants from the MS4 to the maximum extent practicable (MEP), to protect water quality, and to satisfy the appropriate water quality requirements of the Clean Water Act. The stormwater management program shall be based around 6 Minimum Control Measures. The 6 Minimum Control Measures are as follows:

- PUBLIC EDUCATION AND OUTREACH
- PUBLIC PARTICIPATION AND INVOLVEMENT
- ILLICIT DISCHARGE DETECTION AND ELIMINATION
- CONSTRUCTION SITE RUNOFF CONTROL
- POST-CONSTRUCTION RUNOFF CONTROL
- POLLUTION PREVENTION AND GOOD HOUSEKEEPING

III. PUBLIC EDUCATION AND OUTREACH

PERMIT REQUIREMENTS

Permit Section 4.2.1. requires that the City of Tullahoma implement a public education and outreach program that focuses on the impacts of stormwater discharges to water bodies and the steps that the public can take to reduce pollutants in stormwater runoff. The program must target specific pollutants and sources that may cause or contribute to impairment.

Permit Section 4.2.1 also requires that the City develop a Public Information and Education Plan (PIE) that details specific goals and specific public information events/activities that will occur over the remainder of the permit cycle. The PIE shall incorporate components from outreach campaigns and one on one communications and shall incorporate a mode to evaluate the plan's effectiveness so adjustments can be made. The PIE must be completed by the end of the first year of permit coverage.

COMPLIANCE MECHANISMS

To comply with Section 4.2.1 of the General Permit, the City of Tullahoma will implement the following four Best Management Practices (BMPs):

1. Website

The City will redesign its website to include more information and to be more user friendly. The new website will include educational materials such as public service announcements that can be viewed by the general public. The website will also include a copy of all stormwater forms and documents that might be needed by the general public to conduct business with the City of Tullahoma.

Measurable Goals

Year 1 – Have all current forms and documents available on the web site and easy to find.

Year 2 – Have public participation opportunities publicized on the web site

Years 3-5 – Maintain and keep up to date

2. Development Meetings

The City will hold semi-annual meetings with the construction and development community to inform and to gather input on the stormwater program. These meetings will be used as an avenue to inform contractors and developers of proposed changes in the stormwater program. They will also be used as a means of receiving public input on proposed changes to the program.

Measurable Goals

Years 1-5 – Hold two meetings each year of permit coverage.

3. Level 1 Recertification Class

The City of Tullahoma will attempt to serve as host to another Level 1 Recertification Class to coincide with the expiration of the certification of those that attended the previous certification class in Tullahoma.

Measurable Goals

Year 1 – Host recertification class

Year 4 – Host recertification class

4. PIE Development

The City will develop a Public Information and Education Plan that complies with the requirements of the General Permit for the same. The Plan will be developed within

the first year of permit coverage.

Measurable Goals

Year 1 – Complete the Development of the PIE Plan

Years 2-5 – Implement the Plan

The educational program outlined above will be carried out in such a way as to reach as many people as possible over the period covered by the City's current NPDES Permit. While it is likely that most of the educational items will continue beyond the permit period, the specific educational techniques utilized beyond the permit period will depend greatly on the requirements of the State's next General Permit for Small MS4s.

IV. PUBLIC INVOLVEMENT / PARTICIPATION

PERMIT REQUIREMENTS

Section 4.2.2 of the Permit requires that at a minimum, the City shall comply with State and local public notice requirements when implementing a public involvement / participation program. The Permit also requires that the MS4 facilitate opportunities for citizen involvement through activities such as creating a citizens' stormwater advisory council, volunteer stream monitoring programs, storm drain marking, riparian plantings or stream clean-up events. MS4s must develop and implement a method of advertising the public involvement opportunities.

COMPLIANCE MECHANISMS

To comply with Section 4.2.2 of the Permit, the City of Tullahoma will implement the following five BMPs:

1. Advisory Council

The City of Tullahoma will create a Stormwater Advisory Council to participate in stormwater decision making. The Council will also be utilized to help facilitate the public involvement opportunities within the program such as stream clean-up events and educational activities.

Measurable Goals

Year 1 – Set parameters of the council and appoint initial members

Years 2-5 – Hold regular meetings with the council

2. Stream Clean-Up

The City of Tullahoma will host public stream clean-up events. The advisory council will be utilized to determine exactly how the events will be organized. It is envisioned that initial events will focus on smaller sections of major streams such as Rock Creek,

but as the events grow the focus will expand to larger stream segments and to additional streams within the MS4.

Measurable Goals

Year 1 – Create partnerships with local civic groups and utilize advisory council to plan
Years 2-5 – Hold one clean-up event

3. Public Hearings

The City of Tullahoma will hold public hearings for all Stormwater Ordinance revisions. The public hearings will provide an opportunity for interested parties to comment on the proposed changes to the Ordinance prior to the changes being finalized. Public comments will be considered prior to proposed revisions receiving final approval.

Measurable Goals

Year 1 – Hold Public Hearing on Ordinance Revisions (Permit Changes)
Year 4 – Hold Public Hearing on Ordinance Revisions (Green Infrastructure Standards)

4. Annual Reports

The City of Tullahoma completes an Annual Report as required by the Permit each September. The City will make these reports available to the public for public comment via the city's web site and a public hearing.

Measurable Goals

Years 1-5 – The City will hold a public hearing on the Annual Report prior to submitting it to the State.

5. Publicize Plans

The City of Tullahoma will make construction plans available for the public to review and comment on. These plans will be available via the city's web site and comments will be accepted via the site or by written correspondence.

Measurable Goals

Years 1-5 – Make construction plans available on the web and accept comments

These techniques will continue at least through the life of the current NPDES Permit, but will likely be necessary to continue into the foreseeable future.

V. ILLICIT DISCHARGE DETECTION AND ELIMINATION

PERMIT REQUIREMENTS

Section 4.2.3 of the Permit requires that the City of Tullahoma develop, implement, and enforce a program to detect and eliminate illicit discharges (as defined in 40 CFR Part 122.26(b)(2)) into the MS4. 40 CFR Part 122.26(b)(2) defines an illicit discharge as any discharge to a municipal separate storm sewer that is not entirely composed of storm water, except discharges authorized under an NPDES permit (other than the NPDES permit for discharges from the MS4) and discharges resulting from fire-fighting activities.

The Permit requires that the City develop, update, and maintain a storm sewer system map, showing the location of all outfalls (ie., points where the city storm sewer system discharges into wet weather conveyances owned or operated by another MS4, or into waters with use classifications designated by the State) and the names and location of all use-designated waters of the state that receive discharges from those outfalls.

The Permit requires that the City effectively prohibit, through ordinance, or other regulatory mechanism, non-storm water discharges into the storm sewer system and implement an appropriate Enforcement Response Plan (ERP).

The Permit requires that the City develop and implement a plan to detect and address non-storm water discharges, including illegal dumping, to the stormwater system. The Permit also requires that the City inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste. Investigations and results of all non-stormwater discharge investigations, including locations, times, parameters and sampling results, discovered sources of flows, etc. shall be documented.

The Permit requires that the City address the following sources of non-storm water discharges only if they are identified as a significant contributor of pollutants to the MS4: water line flushing, landscape irrigation, diverted stream flows, rising ground waters, uncontaminated ground water infiltration (as defined in 40 CFR §35.2005(20)), uncontaminated pumped ground water, discharges from potable water sources, foundation drains, air conditioning condensation, 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, and street wash water (discharges or flows from fire-fighting activities are excluded from the effective prohibition against non-storm water and need only be addressed where they are identified as significant sources of pollutants to waters of the state).

The Permit requires that the City, by ordinance or other regulatory mechanism, prohibit contamination of stormwater runoff from hotspots, including restaurants, auto repair shops, auto supply shops, industrial facilities, and large commercial parking areas.

COMPLIANCE MECHANISMS

The City of Tullahoma will comply with each of the Permit requirements listed above

through implementation of the following BMPs:

1. Public Service Announcements (PSAs)

The City of Tullahoma will obtain PSAs directed specifically at illicit discharges. These PSAs will be made available over the city's web site and by other appropriate means.

Measurable Goals

Years 1-5 – Have PSAs linked to web site and played on radio

2. Spill Clean-Up SOPs

The City of Tullahoma will coordinate with local spill response agencies to ensure that appropriate spill response procedures are in place which address water quality concerns associated with the clean-up of spilled chemicals and fuels.

Measurable Goals

Year 1 – Meet with local agencies to determine what currently exists and foster support

Year 2 – Draft SOP and allow review and comments from all agencies and public

Year 3 – Have all agencies adopt SOP and put into practice

Years 4-5 – SOP fully implemented

3. Dry Weather Screening

The City of Tullahoma will periodically perform a screening of all outfalls during dry weather to search for illicit discharges. A form has been developed for the documentation of the inspection. Future screening events will include the taking of photographs with a GPS camera that can be used to insert the photos into the GIS mapping system.

Measurable Goals

Year 1 – Develop a schedule and begin implementation

Years 2-5 – Continue implementation of the schedule

4. Industrial and Commercial Facilities Inspection

The Department of Public Works will continue to inspect all new industrial and commercial facilities to ensure that all stormwater requirements are understood. This item includes a one on one educational aspect with all of the business public in the city.

Measurable Goals

Years 1-5 – Inspect 100% of new commercial and industrial businesses

VI. CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

PERMIT REQUIREMENTS

Section 4.2.4 of the Permit requires that the City of Tullahoma develop, implement, and enforce a program to reduce pollutants in any storm water runoff to the MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. Reduction of storm water discharges from construction activity disturbing less than one acre must be included in the program if that construction activity is part of a larger common plan of development or sale that would disturb one acre or more.

The Permit requires the City to develop an ordinance, or other regulatory mechanism, to require erosion and sediment controls, as well as sanctions to ensure compliance. This regulatory mechanism must be modified within 18 months of coverage under the Permit to be consistent with the requirements of the NPDES General Permit for Construction Activity.

The Permit requires the City to develop requirements for construction site operators to implement appropriate erosion and sediment control best management practices.

The Permit requires that special requirements for impaired waters or for exceptional Tennessee waters be consistent with those of the current NPDES General Permit for Construction Activity.

The MS4 must develop and maintain an inventory of all active public and private construction sites that result in a total land disturbance as defined in section 4.2.4. For existing MS4s, the inventory must be completed within 12 months of coverage under this permit and must be updated as new projects are permitted and projects are completed. For new MS4s, the inventory must be completed within 24 months of coverage and must be updated as noted above for existing MS4s. The inventory must contain relevant contact information for each project (e.g., tracking number, name, address, phone, etc.), the size of the project and area of disturbance, whether the project has submitted for permit coverage under the Tennessee Construction General Permit (TNR100000) and the date the MS4 approved the construction site plan. The MS4 must make this inventory available to TDEC upon request.

The Permit requires the City to develop requirements for construction site operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that may cause adverse impacts to water quality.

The Permit requires the City to implement procedures for site plan review, which incorporate consideration of potential water quality impacts. The MS4 procedures must include an evaluation of plan completeness and overall BMP effectiveness.

The MS4 must have mechanisms for public access to information on projects and receiving and considering comments from the public on those projects. It is recommended that the MS4 use the worldwide web for facilitating public involvement.

The MS4 must have procedures in place for its inspectors to evaluate construction site compliance. The ERP must include specific enforcement steps to ensure construction sites are in compliance with the MS4's program.

The Permit requires that inspectors must maintain certification under the Tennessee Fundamentals of Erosion Prevention and Sediment Control, Level 1 (or equivalent). Construction site plan reviewers must receive a certificate of completion from the Tennessee Erosion Prevention and Sediment Control Design Course, Level 2. It is recommended that MS4 staff receive training under both courses.

The Permit requires that the City's program provide for the following:

- (a) Recognition of priority construction activity, including at a minimum those construction activities discharging directly into, or immediately upstream of, waters the state recognizes as impaired (for siltation) or high quality,
- (b) Pre-construction meetings with construction-site operators, for priority construction activities; and
- (c) Inspections by the MS4, of priority construction sites at least once per month.

COMPLIANCE MECHANISMS

The following BMPs will be implemented by the City of Tullahoma to comply with all of the requirements of the Construction Site Runoff Control portion of the Permit.

1. Stormwater Management Ordinance

The City will update its existing Stormwater Management Ordinance to include all of the new requirements of the NPDES General Permit for Discharges from Municipal Separate Storm Sewer Systems (MS4). The ordinance will also be updated to be consistent with the requirements of the NPDES General Permit for Discharges from Construction Activity.

Measurable Goals

Year 1 – Make all necessary revisions to ordinance other than green infrastructure revisions

Year 2 – Enforce revised ordinance

Year 3 – Draft green infrastructure revisions to Ordinance

Year 4 – Pass green infrastructure revisions to Ordinance

Year 5 – Enforce green infrastructure revisions to Ordinance

2. Monitoring

The City will develop a monitoring program to determine the effectiveness of the construction program. The monitoring program will consist of specific protocols to be

used and a schedule for the monitoring to be conducted. Over time, the results of the monitoring will be used as a measure of the effectiveness of the construction program.

Measurable Goals

Year 1 – Develop written plan, select protocols, and develop schedule

Year 2 – Start implementation of monitoring program

Years 3-5 – Continue implementation of program

3. Recertification

The City will attempt to host another recertification class for the Level 1 Fundamentals of Sedimentation and Erosion Control. The City will contact the University of Tennessee and offer to host another class. Whether or not the City is allowed to host another class is ultimately up to the University of Tennessee and not the City of Tullahoma.

Measurable Goals

Year 1 – Host recertification class

Year 4 – Host recertification class

4. Erosion Control Plan Review

The City will make Erosion and Sedimentation Control Plans available to the public for review and comment. This will be accomplished by requiring that an electronic copy of plans be submitted in pdf format. Those plans will then be made available for viewing via the stormwater section of the city's website. The website will also contain an e-mail link by which the public may comment on the plans throughout the construction project.

Measurable Goals

Year 1 – Make plans available on the web site and accept comments via e-mail

Years 2-5 – Keep site up to date and current

5. Development Meetings

The City of Tullahoma will hold semi-annual meetings with the development community to discuss the status of the stormwater program. This forum will be utilized as an opportunity to introduce proposed changes to the program and to accept feedback from the development community on the implementation of those changes. The city will attempt to have corporate sponsors for these meetings by allowing companies that have products or services that may be able to assist the development community with compliance or implementation to come in and introduce their products.

Measurable Goals

Year 1 – Plan specifics of meetings and hold one meeting

Years 2-5 – Hold two meetings per year

VII. PERMANENT STORMWATER MANAGEMENT

PERMIT REQUIREMENTS

Section 4.2.5.1 of the Permit requires the City to develop, implement, and enforce a program to address permanent stormwater runoff management from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale, that discharge into the MS4. The program must ensure that controls are in place that would prevent or minimize water quality impacts.

The Permit requires that the City develop and implement strategies which include a combination of structural and/or non-structural BMPs appropriate for the community.

The Permit requires that the City must develop and implement a set of requirements to protect and maintain water quality buffer along all waters of the state at new development and redevelopment projects.

The Permit requires the City to use an ordinance or other regulatory mechanism to address permanent runoff from new development and redevelopment projects to the extent allowable under State or local law. The ordinance must allow for the maximum penalties per day for each day of violation as specified in TCA 68-221-1106.

The MS4 must implement and enforce permanent stormwater controls that are comprised of runoff reduction and pollutant removal. The permittee must require that stormwater discharges from new development and redevelopment sites be managed such that post-development hydrology does not exceed the pre-development hydrology at the site, in accordance with the performance standards contained in this section of the permit. Runoff reduction is the preferred control practice as it can achieve both volume control and pollutant removal.

The Permit requires that design standards for all new and redevelopment require, in combination or alone, management measures that are designed, built and maintained to infiltrate, evapotranspire, harvest and/or use, at a minimum, the first inch of every rainfall event preceded by 72 hours of no measurable precipitation. The first one inch of rainfall must be 100% managed with no stormwater runoff being discharged to surface waters.

The Permit requires the city to review local codes and ordinances using the EPA Water Quality Scorecard. This must be completed within the first year of permit coverage. The city must update codes and ordinances, if necessary, within four years of permit coverage.

The Permit requires the city to develop project review, approval, and enforcement procedures.

The procedures must apply, at a minimum, to all projects requiring a construction general permit.

The Permit requires that all BMPs installed and implemented to meet the performance standards of this section of the permit be maintained in perpetuity. The city must ensure the long term maintenance of these BMPs through a local ordinance or other enforceable policy. The Permit requires that the city require the owner of BMPs to develop and implement a maintenance agreement addressing maintenance requirements for any BMPs. The city must require that the owner of BMPs provide verification of maintenance of the approved BMPs. The agreement must allow the city to conduct inspections of the BMPs and must allow the city to perform corrective actions when not completed by the owner, as required, and bill the owner for the work completed.

The Permit requires the city to develop a system designed to track BMPs deployed at new and redevelopment projects. The tracking system must include ownership information, a description, location, coordinates, maintenance requirements, and inspection information.

The Permit requires the city to require owners of BMPs to perform periodic inspections of the control measures to ensure that they are functioning properly. They must require that routine inspections be performed annually by someone familiar with the control measure. They must also require that a comprehensive inspection be completed every five years by a professional engineer or landscape architect.

COMPLIANCE MECHANISMS

The City will utilize the following BMPs to comply with the Permit requirements for Permanent Stormwater Management:

1. EPA Water Quality Scorecard

The City will complete the Water Quality Scorecard and during this process will perform a review of existing codes and ordinances that might prove detrimental to the implementation of the permanent stormwater management performance standards.

Measurable Goals

Year 1 – Complete the Scorecard

Year 2 – N/A

Year 3 – Use the Scorecard as a tool to help draft the green infrastructure standards

Year 4 – Adopt green infrastructure standards with Scorecard as a guide

Year 5 – Complete Scorecard again as a comparison to original score

2. BMP Tracking System

The City will develop a system to track all permanent stormwater management BMPs. The system will include all required information and will be used to track the maintenance and inspection of the BMPs to ensure that they are being completed as

required by the Permit.

Measurable Goals

Year 1 – Develop tracking mechanism and put into practice
Years 2-5 – Continue tracking of all BMPs

3. Green Performance Standards

The city will implement green infrastructure performance standards to achieve the required performance standards of the permit. It is uncertain exactly what these standards will consist of until such time as the city has completed the review of codes and ordinances and has received public input on this issue.

Measurable Goals

Year 1 – Complete EPA Water Quality Scorecard
Year 2 – Start determining what Performance Standards will consist of
Year 3 – Draft Performance Standards and Ordinance Revisions
Year 4 – Adopt Standards and Ordinance Revisions; Start Implementation
Year 5 – Continue full implementation of the standards

4. Public Meeting

The city will hold at least one public meeting to introduce the idea of and accept comments and recommendations on the green performance standards. Builders and developers will especially be encouraged to attend this meeting, but all of the public will be invited to attend the meeting and provide input.

Measurable Goals

Year 1 – Provide educational information on Green Infrastructure through website
Year 2 – Continue educational efforts on Green Infrastructure
Year 3 – Hold at least one public meeting to take comments on Green Infrastructure
Year 4 – Make proposed ordinance available for review and hold public hearing

VIII. POLLUTION PREVENTION / GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

PERMIT REQUIREMENTS

The Permit requires that the City develop and implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations.

The City will utilize the following BMPs to comply with the Permit requirements for Pollution Prevention / Good Housekeeping for Municipal Operations:

1. Employee Training

The Public Works Department will develop and implement an employee training program to teach proper chemical usage and disposal practices. The training will be repeated at intervals sufficient to assure that employees retain the information. A schedule will be developed and adhered to by the Director of Public Works.

Measurable Goals

Years 1-5 – Provide training to all necessary municipal employees

2. Structure Inspections

The Public Works Department will inspect drainage structures such as catch basins to determine an appropriate interval of maintenance and cleaning out for each structure.

Measurable Goals

Year 1 – Develop schedule and procedure for inspections

Years 2-5 – Complete inspections as outlined in the developed schedule

3. Street Sweeping

The Public Works Department will develop and implement a program and schedule for sweeping streets based on the findings of the structural inspections.

Measurable Goals

Year 1 – Complete street sweeping as done in the past

Year 2 – Use inspection data to develop a schedule of sweeping that addresses actual needs

Year 3-5 – Sweep streets based on schedule developed from inspections

4. Municipal Inspections

The city will conduct inspections of all municipal operations to ensure that stormwater compliance is being maintained and is a priority of the operation.

Measurable Goals

Year 1 – Inspect all municipal operations for stormwater compliance

Years 2-5 – Inspect municipal operations as needed to ensure compliance

IX. RESPONSIBLE PARTY

The Director of Public Works is responsible for all aspects of compliance with this Stormwater

Management Plan. While certain aspects of the Plan may be completed by other entities within the City of Tullahoma, the Director of Public Works is ultimately responsible for seeing that these aspects are completed as required.

X. MUNICIPAL OPERATED FACILITIES

Department of Public Works

The Department of Public Works facility maintains a fleet of garbage trucks and recycling vehicles. This facility also contains a recycling operation. Drainage from this facility is routed to a sediment basin and is monitored in accordance with the Tennessee Multi-Sector Industrial Stormwater General Permit.

XI. INSPECTION PROGRAMS

Construction Inspections

Construction inspections are conducted at all permitted construction projects within the Tullahoma MS4. All inspections are documented on an inspection form and filed at the Department of Public Works. Priority sites are inspected at a minimum of once per month but are typically inspected at a more frequent rate.

Industrial Inspections

All existing industrial facilities within the Tullahoma MS4 have been inspected at least once since the city was declared an MS4 by the TN Department of Environment and Conservation. These inspections consisted of a review of existing stormwater permit materials (TMSP Permit and SWPPP), if available, and a walk through of the facility grounds. The inspections were documented on inspection forms, which are all filed at the Department of Public Works. The industrial facilities were all required to correct any deficiencies that were noted during the inspections. New industrial facilities will be inspected within the first few months of their beginning operation.

Restaurant Inspections

All restaurant facilities in the City of Tullahoma have been inspected. These inspections have focused primarily on grease handling and waste handling practices at the facility. Restaurant facilities have been required to prepare a Best Management Practices Plan which details the methods that the facility will utilize to ensure that oil and waste handling practices will not have an adverse impact on stormwater quality. All inspections were documented on an inspection form. These inspection forms and copies of the Best Management Practices Plans are on file at the Department of Public Works. New restaurant facilities are inspected within a few months of their beginning operations.

Automotive Repair Facility Inspections

All automotive repair facilities in the City of Tullahoma have been inspected. These

inspections have focused primarily on waste oil handling and other waste handling practices at the facility. Automotive repair facilities have been required to prepare a Best Management Practices Plan which details the methods that the facility will utilize to ensure that oil and waste handling practices will not have an adverse impact on stormwater quality. All inspections were documented on an inspection form. These inspection forms and copies of the Best Management Practices Plans are on file at the Department of Public Works. New automotive repair facilities are inspected within a few months of their beginning operations.

Commercial Facility Inspections

All commercial facilities within the City of Tullahoma have been inspected for stormwater compliance. While many of these facilities have no outdoor activities other than a dumpster facility, they are educated on the importance of not placing items in the dumpster that could potentially leak out or end up on the ground outside the dumpster. All inspections are documented on an inspection form. Inspection forms are maintained at the Department of Public Works.