

NPDES MS4 Annual Report

version 1.3

(Submission #: HPW-KE6P-Y7016, version 1)

Details

Originally Started By AMANDA MCMULLEN**Submission ID** HPW-KE6P-Y7016**MS4 Owner Name** City of Kingsport**Status** Draft

Form Input

General Information

Permit Number

TNS075388

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

City of Kingsport

County

Sullivan

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 Last Name**Pat *Shull***Title***Mayor***Company Name***City of Kingsport***Phone Type Number Extension**

Business 423-229-9412

Email

PatShull@kingsporttn.gov

Address

415 Broad Street

Kingsport, TN 37660

Designated MS4 Stormwater Management Program Contact**Prefix**

Mr.

First Name

Chad

Last Name

Austin

Title

Assistant Utility Director - Engineering/Operations Utility Services Division

Company Name

City of Kingsport

Phone Type

Business

Number

423-229-9454

Extension**Email**

ChadAustin@KingsportTN.gov

Address

1113 Konnarock Road

Kingsport, TN 37664

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).

3

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 Activity
Public	TNSA social media campaign	Yes	Yes	Yes	Yes	7/1/2022	Facebook	44910	Monetary
Public	Kingsport Public Works Facebook page	Yes	No	No	Yes	7/1/2022	Kingsport residents on Facebook	4505	N/A
Public	Storm Drain Art	Yes	No	No	No	9/1/2022	residents	2239	N/A
Public	Stormy school visit	Yes	No	No	Yes	7/14/2022	local children	27	N/A
Public	Stormwater Activity booklets	Yes	No	No	No	1/26/2023	local 4th graders	555	N/A
Public	City Website	Yes	No	Yes	Yes	7/1/2022	residents	1400	N/A
Public	Brochure distribution at Public Works Day	Yes	No	No	Yes	5/25/2023	local families	400	N/A

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
Engineering and Development Community	Preconstruction Meetings	Yes	Yes	7/21/2022	contractors and developers	64
Engineering and Development Community	Fats, Oils & Grease Program	Yes	No	7/1/2022	restaurants and food service	182
Engineering and Development Community	City Website	Yes	Yes	7/1/2022	engineers and developers	1400

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://www.kingsporttn.gov/wp-content/uploads/SWMP.pdf>

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

No

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.

8

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)?

2

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).

2

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
General Public	Stream Clean-up	Yes	Yes	No	Yes	10/8/2022	kayakers	10
General Public	Keep Kingsport Beautiful litter pickup	Yes	Yes	No	Yes	3/19/2023	volunteers	28
General Public	Keep Kingsport Beautiful conservation camp	Yes	Yes	Yes	No	9/13/2022	local 4th graders	500
General Public	Public Works Day	Yes	Yes	Yes	Yes	5/25/2023	local families	400
General Public	Storm Drain Art Contest	Yes	Yes	No	No	9/5/2022	local artists	18
General Public	Tree seedling giveaway	Yes	Yes	No	No	4/10/2023	residents	50
General Public	Rain Barrel sale	Yes	Yes	No	No	4/17/2023	residents	50

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.

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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
Commercial and Development Community	Fats, Oils and Grease Program	Yes	Yes	7/1/2022	restaurant and food service	110
Commercial and Development Community	Pre-development Meetings	Yes	Yes	7/7/2022	development community	48

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?

Yes

Provide location for Spatial Rest Service for Map Layer(s)

<https://kingsporttn.maps.arcgis.com/apps/webappviewer/index.html?id=7339745aca56474a80b966b61912a033>

The number of potential illicit discharges reported by the public.

2

The number of potential illicit discharges reported by internal personnel.

1

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

2

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.

2

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?

Yes

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.
25

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.
47

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

Number of active non-priority construction activities.
25

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

Number of active priority construction activities.
1

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

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.
47

Number of new development and redevelopment projects reviewed in accordance with the established policy and procedure.
47

Number of sites verified that 100% of SCMs are installed per design specifications in accordance with approved plan.
17

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.

41

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

Yes

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?

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?

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

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

Program Elements	Changes	Modifications that Add Components	Replaced an Ineffective or Infeasible BMP or SCM	Subtracted BMP, SCM, Components, Controls etc.
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	1	3	1	5
Written Notice of Violation	1	5	40	46
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: 51

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.

Only a Visual Stream Assessment of Clark Branch has been done. The other 6 streams due for VSAs (every 5 years) will be done before the end of 2023.

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.

[CLARK REPORT.pdf - 08/14/2023 11:32 AM](#)

[outfalls.pdf - 08/14/2023 11:33 AM](#)

[buffer.pdf - 08/14/2023 11:33 AM](#)

[dumping.pdf - 08/14/2023 11:33 AM](#)

[erosion.pdf - 08/14/2023 11:33 AM](#)

[barrier.pdf - 08/14/2023 11:33 AM](#)

Comment

Attached is report and field sheets for Clark Branch Visual Stream Assessment

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.

Compliant

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

PIE plan currently being modified for new MS4 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.

Stormwater Annual Report.pdf - 08/21/2023 12:44 PM

Comment

NONE PROVIDED

Attachments

Date	Attachment Name	Context	User
8/21/2023 12:44 PM	Stormwater Annual Report.pdf	Attachment	AMANDA MCMULLEN
8/14/2023 11:33 AM	outfalls.pdf	Attachment	AMANDA MCMULLEN
8/14/2023 11:33 AM	buffer.pdf	Attachment	AMANDA MCMULLEN
8/14/2023 11:33 AM	dumping.pdf	Attachment	AMANDA MCMULLEN
8/14/2023 11:33 AM	erosion.pdf	Attachment	AMANDA MCMULLEN

Date	Attachment Name	Context	User
8/14/2023 11:33 AM	barrier.pdf	Attachment	AMANDA MCMULLEN
8/14/2023 11:32 AM	CLARK REPORT.pdf	Attachment	AMANDA MCMULLEN