

Kentucky Division of Water

GENERAL PERMIT ANNUAL COMPLIANCE REPORT.

Phase II Stormwater MS4
Kentucky Division of Water

NOTE:

- In order to comply with KPDES sMS4 permits, annual reports must be submitted to the Kentucky Division of Water.
- **Please type or print in ink.**
- Please answer all questions **thoroughly** and return the form by the due date.
- Return this form and any required addenda to the KDW MS4 Coordinator at the address listed in the box on the upper-right.
- **Due April 15, 2016.**

For questions regarding this form, contact:

Abigail Rains

ENERGY AND ENVIRONMENT CABINET
DEPARTMENT FOR ENVIRONMENTAL
PROTECTION
Division of Water
200 Fair Oaks Lane, 4th Floor
Frankfort, KY 40601
Phone: (502) 564-3410, Extension 4891

REPORTING
YEAR
(Check one)

- 2012
- 2013
- 2014
- 2015
- 2016

PART A: GENERAL INFORMATION – MS4 OPERATOR

City of Paducah

Permit Number **K Y G 2 0 0 0 0 0** /Area **8751** /Population **25023** (2010 census)

Mailing Address:

Street Address: 300 South 5th Street
Paducah, KY 42001

<input checked="" type="checkbox"/> City <input type="checkbox"/> County <input type="checkbox"/> Other	Of: Paducah	Zip: 42001	County: McCracken
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PART B: GENERAL INFORMATION – CONTACT PERSON

Eric Hickman, P.E.

Storm Water and Drainage Engineer

(270) 444-8511

ehickman@paduahky.gov

PART C: CONTROL MEASURE ACTIVITIES

11. For the following items, please provide a summary of control measure activities related to sMS4 performed during the previous year. List any updated measurable goals from the Stormwater Quality Management Plan (SWQMP), compliance activities, Best Management Practices (BMP) installed or initiated, and updated or developed regulatory mechanisms with effective dates.

A. Public Education and Outreach:

Describe your public education efforts for the last 12 months:

Please see attached Measurable Goals Matrix Table MCM 1 Public Education and Outreach.

Please see the next sheet for the City of Paducah's partnership with the Kentucky Transportation Cabinet within the City's MS4 boundary.

Describe your method of outreach:

Local efforts of public education and outreach can be found in the Measurable Goals Matrix Table MCM 1 Public Education and Outreach section of the Annual Report. As outlined in the table, public education and outreach efforts take place at several local events which allows the City to reach a wide variety of citizens. The City also utilizes a local government channel to broadcast City Commission meetings and also highlights certain events and departments throughout the City. A variety of information can also be found at www.paducahky.gov. Various social media outlets such as Twitter, Facebook, and YouTube are also utilized to outreach the public for various events.

Also, at the state level, the KYTC Media Outreach Program is utilized throughout the state to help educate the public on storm water issues. The City of Paducah and the KYTC are NOT Co-Permittees. However, the public education efforts made by the KYTC thru storm water advertising were aired in the City of Paducah. They were advertised on the local television station, WPSD News Channel 6, and were advertised on several local radio stations (WKYX 94.3, WKYQ 96.9, and WFGS 103.7). The storm water messages are probably aired in the Paducah area due to the regional location of Paducah.

Describe how you measure success for reaching the goal of this MCM:

Please see attached Measurable Goals Matrix Table MCM 1 Public Education and Outreach.

Q If for other effluent permits, please provide a summary of control measures and water related tools MS4 performed during the previous year. This may include treatment equipment, monitoring, stormwater quality management plan (SWMP), compliance, city/area/Board management practices (e.g.,) and collection of data and updated documentation of regulatory mandates with respect to water.

A. Public Education and Outreach:

Describe your public education efforts for the last 12 months:

KYTC with our MS4 and partner communities utilize several approaches to public education. The most pronounced is a mass media play via radio and television. We also utilize a website tied in with the radio and television spots. KYTC in a combined effort with the MS4 communities manage the Adopt-A-Highway program. KYTC also utilizes our Kentucky Engineers Exposure Network (KEEN) to promote stormwater issues in community schools.

Describe your method of outreach:

The KYTC Media Outreach Program (MOP), in conjunction with our partner MS4 communities, contracted with the Kentucky Broadcasters Association (KBA) to air a video spot and six audio spots in 2014. The 30 second spots have been aired statewide as a public education initiative to inform the general population about stormwater issues. The ads messages were developed after the statewide survey conducted in 2008 identified that half of the population is unaware that storm drains discharge directly to waters of the Commonwealth without treatment. The ads can be viewed on stormwater.ky.gov. The TV and radio plays combined totaled 94,016 plays statewide in 2015 for a total value of \$1,671,404.

KYTC initiated a committee of five MS4 representatives and the DOW representative in 2009 to work with our consultant, New West, to develop the ads. The members are Abby Rains – DOW, Suzie Bradley – Campbellsville, Randy Stambaugh – MSD, Vicki Brackett – Hardin County, Jamie Holtzapfel – SD1 and Jack Wright – Plum Springs Warren County Joint Storm Water Sewer Agency. A mix of general information and specific item ads were developed. The resulting work of the committee was the six audio spots and the one video spot. In 2012 the committee was called together again to develop a new TV advertisement for the stormwater program. The new ad began airing in December 2012. KBA distributes the ads to 230 stations in 132 communities. The KBA receives certified reports from the member stations verifying the number of times the spots are played. Since the inception of the Media Outreach Program there have been 443,422 plays for a total value of \$8,327,828.

The 2015 summary of ad play is as follows:

85,977 radio Spots with a value of \$1,259,438

8,039 television plays with a value of \$411,966

TV and radio plays combined totaled 94,016 plays statewide for a total value of \$1,671,404.

A new website URL was secured and a new website prepared to help launch the MOP and provide a statewide resource for the KYTC and our partner MS4 communities to promote stormwater issues. The website was designed to address both the public and those involved with the MS4 program either as a permitted community, construction contractor or KYTC. It provides basic information regarding what is stormwater and stormwater pollution, who to contact if more information is needed or a concern needs to be reported, and technical information for MS4 communities and contractors. The website had 608 visits in 2015 and 2,830 page views.

Kentucky has participated in the International Adopt-A-Highway Program since 1988. The Commonwealth has one Statewide Adopt-A-Highway Coordinator in central office and 12 Adopt-A-Highway District Coordinators throughout the state. The Adopt-A-Highway program involves community groups to organize and pick up litter. The Transportation Cabinet participates in Adopt-A-Highway meetings as agreed upon by the Local Community and KYTC. There are 674 groups that manage 1,367 miles of roads throughout the state.

The Members of KYTC's KEEN organization held twenty-one presentations at schools and groups across the state. The presentations included the Enviroscape, Fishy Tale, and Sum of All Parts. Some of the locations were Glasgow, Walton, Cold Spring, Covington, Erlanger, Alexandria, Bellevue, Brooksville and Rowan County.

B. Public Involvement and Participation:

Do you have a Stormwater Advisory Committee (SWAC)?

Yes, please see attached Measurable Goals Matrix Table MCM 2 Public Involvement/Participation.

Describe any events or activities facilitated by or sponsored by the MS4 in the last 12 months:

The City of Paducah public involvement and participation efforts can be found in the Measurable Goals Matrix Table MCM 2 Public Involvement and Participation. The MCM 2 Table outlines several events sponsored by the City of Paducah such as the Ohio River Sweep and Household Hazardous Waste Cleanup Day. Please refer to the MCM 2 Measurable Goals Matrix Table for additional information about local Public Involvement/Participation efforts. See the Public Education and Outreach section of the report for various methods utilized to spread the word about Public Involvement and Participation activities.

Describe how you measure success for reaching the goal of this MCM:

Please see attached Measurable Goals Matrix Table MCM 2 Public Involvement/Participation.

C. Illicit Discharge Detection and Elimination:

Have you passed IDDE Ordinance?

Yes, please see <http://library.municode.com/index.aspx?clientId=11392> then go to Chapter 42 Article II Section 52 Illicit Discharges.

Does the ordinance include escalated enforcement procedures?

Yes, please go to the above referenced link then go to Chapter 42.

Do you have a written IDDE Plan in place?

Yes, please see the attached Measurable Goals Matrix Table MCM 3 Illicit Discharge Detection and Elimination.

Have you completed the mapping of major outfalls?

This is an ongoing event. The storm sewer map continuously gets updated as new discoveries of outfalls are found and existing mapping is field verified. The GIS system is also updated accordingly as pipe materials and sizes are subject to change. Please see attached Measurable Goals Matrix Table MCM 3 Illicit Discharge Detection and Elimination for additional mapping information.

Have you dry-screened your major outfalls?

Dry-screening outfalls are an ongoing event. As new outfalls are discovered, the ultimate percentage of the system screened is change. Please see attached Measurable Goals Matrix Table MCM 3 Illicit Discharge Detection and Elimination for additional information.

Did you have any illicit discharges in the last 12 months, if so, describe discharge and resolution.

Two Illicit Discharges were reported to the Engineering Department in the last 12 months. Information regarding the illicit discharges is included in the attached Measurable Goals Matrix Table MCM3 Illicit Discharge Detection and Elimination. One illicit discharge was self-reported and was cleaned up immediately. The second illicit discharge was a residence that had been dumping grease into a storm drain. Employees of the City Street Department were cleaning the drain and reported the issue. A Notice of Violation was issued to the homeowner and a fine was assessed. The table details these instances along with pictures and a copy of the NOV to the homeowner.

Describe how you measure success for reaching the goal of this MCM:

Please see the attached Measurable Goals Matrix Table MCM 3 Illicit Discharge Detection and Elimination.

D. Construction Site Stormwater Run-off Control:

Have you passed the Construction Site Stormwater Runoff Control (EPSC) Ordinance?

Yes, please see <http://library.municode.com/index.aspx?clientId=11392> then go to Chapter 50 Article IV, Erosion Prevention and Sediment Control. Other ordinances that could be applicable to Construction Site Stormwater Runoff include Chapter 42-52 Illicit Discharges, Chapter 42-47 Litter, and Chapter 42-49 Solid Waste.

Does the ordinance include escalated enforcement?

Yes

Are you requiring proof of the receipt of KYR10 permit?

Through the City of Paducah permitting process and by City Ordinance, the City requires proof of the receipt/proof of submittal of the KYR 100000 permit.

Do you give the developer a permit from you, the MS4?

The developer/contractor/property owner/person financially responsible for implementing the erosion prevention and sediment control measures is responsible for obtaining a City of Paducah Land Disturbance/Grading/Erosion Prevention Sediment Control Permit. The person responsible for obtaining the permit is issued the permit upon proof of receipt/proof of submittal of the KYR 100000 permit (if applicable) and review of a SWPPP plan using the KYR 100000 permit requirements as a review checklist.

How often are you inspecting active construction sites?

Please see the Measurable Goals Matrix Table MCM 4 Construction Site Storm Water Runoff Control for the ongoing effort of inspecting construction sites.

How many inspections resulted in enforcement actions? Fines collected?

Please see the Measurable Goals Matrix Table MCM 4 Construction Site Storm Water Runoff Control notice of violations issued with land disturbance activities. No fines were collected.

Describe how you measure success for reaching the goal of this MCM:

Please see the Measurable Goals Matrix Table MCM 4 Construction Site Storm Water Runoff Control for the ongoing effort of inspecting construction sites.

E. Post-construction Stormwater Management in New Development and Redevelopment:

Have you passed Post-Construction Ordinance?

Yes, please see <http://library.municode.com/index.aspx?clientId=11392> then go to Chapter 50 Article III, Storm Water Conveyance and Management. Other ordinances that are applicable include Chapter 42-52 Illicit Discharges, Chapter 42-47 Litter, and Chapter 42-49 Solid Waste. Currently the City Ordinance states in Chapter 50 Article III 50-153, "The use of other methods of controlling peak discharge rates and pollutant removal, such as bio-retention swales, infiltration ditches, hydrodynamic separators, and created wetlands may be required by the city, in its sole discretion, for some large developments. Additionally, the city will promote conservation measures such as buffer strips and greenways as acceptable techniques toward the protection and improvement of local waterways." The exercise of this ordinance has allowed the City to require the installation of stormwater treatment devices at commercial developments.

Does the ordinance include escalated enforcement?

Yes.

Have you adopted the 80% stormwater treatment standard into your ordinance?

No, it has been prepared and was previously submitted to KDOW on April 11, 2013 along with the 2012 Annual Report. The City of Paducah does not wish to adopt the subject ordinance until KDOW has completed its review to insure the Paducah "Draft Ordinance" is compliant with KDOW expectations and/or requirements.

Per the KYG20 Permit on Part Page II-9 - The permittee shall demonstrate compliance with the requirements for post-construction controls by summarizing the following in the annual report. A summary of the number and types of projects that the permittee reviewed for new and redevelopment considerations and the types of BMPs installed including green infrastructure and buffers.

i. A summary of management practice maintenance inspections conducted by the permittee(s), including a summary of the number requiring maintenance or repair, and the number of enforcement actions taken.

Please see Measurable Goals Matrix Table MCM 5 Post-Construction Storm Water Management in New Development and Redevelopment.

ii. A summary of any changes to local ordinances to accommodate green infrastructure alternatives.

Please see Measurable Goals Matrix Table MCM 5 Post-Construction Storm Water Management in New Development and Redevelopment.

iii. MS4 staff must be trained in the fundamentals of long-term stormwater-quality treatment management practices and in how to review such practices on construction plans and how to inspect practices for long-term protection, operation and maintenance. Please describe the training of staff in the last 12 months.

Please see Measurable Goals Matrix Table MCM 5 Post-Construction Storm Water Management in New Development and Redevelopment.

Describe how you measure success for reaching the goal of this MCM:

Please see Measurable Goals Matrix Table MCM 5 Post-Construction Storm Water Management in New Development and Redevelopment.

F. Pollution Prevention and Good Housekeeping for Municipal Operations:

The permittee must develop and implement an Operation and Maintenance (O & M) program that includes a training component with the goal of preventing or reducing pollutant runoff from municipal operations. Please describe the O & M Program that you have developed and implemented within the last twelve (12) months.

The Operation and Maintenance Program of the City has stepped up its facility maintenance operations since the merger of the Engineering Department and the Public Works Department in 2009. City Hall, the Public Works Facility, and the Compost Yard have seen dramatic changes in the organization of materials and facility operations. The organization of materials has allowed the City to become more efficient in the amount of supplies and materials that are used. The organization of materials helps prevent spills of stored materials and helps save the City money by reducing the amount of supplies that are purchased.

Additional Best Management Practices for Pollution Prevention and Good Housekeeping can be found at in the Measurable Goals Matrix Table MCM 6 Pollution Prevention/Good Housekeeping for Municipal Operations.

Is the Operation and Maintenance Program/Plan formalized or written?

The Operation and Maintenance program is formalized but not written as a plan.

Describe how you measure success for reaching the goal of this MCM:

Please see Measurable Goals Matrix Table MCM 6 Pollution Prevention/Good Housekeeping for Municipal Operations.

12. Provide any data regarding the following indicators (if applicable). Attach separate sheets as necessary, and indicate, as appropriate, the rationale behind not using a listed indicator.

- a) Number or percentage of citizens that aware of storm water quality issues A citizen survey was performed in 2013 by method of random sampling. This survey had storm water related items in it, but was not strictly for storm water quality. For more information about the survey please visit <http://www.paducahky.gov/paducah/citizen-survey>. Also, a storm water questionnaire is currently developed for public events but was not used in 2015.
- b) Number and description of meetings, training sessions, and events conducted to involve citizens - Please see attached Measurable Goals Matrix Table MCM 2 Public Involvement/Participation. There are also regional meetings that are conducted to involve citizens. These meetings are facilitated by the Four Rivers Basin Team and Watershed Watch. Typical items of discussion are local 319 projects, local water quality, and natural resources.
- c) Number or percentage of citizens that participate in storm water quality improvement projects - Please see attached Measurable Goals Matrix Table MCM 2 Public Involvement/Participation.
- d) Number and location of storm drains marked - Paducah does have some storm drains marked, however an unknown amount or exact location is known. Most drains in the downtown area that discharge directly to the river are marked/stenciled.
- e) Estimated linear feet or percentage of MS4 conveyances mapped - Please see attached ArcGIS CD in Appendix B and the attached Measurable Goals Matrix Table MCM 3 Illicit Discharge. Detection and Elimination. Also, please see the website, <http://www.map-gis.org/> for additional maps. The GIS information on the website is also updated to include the mapped MS4 conveyances. After GIS edits are saved in the system, they are updated to the website.
- f) Number and location of MS4 area outfalls mapped - See response to Item e) in this section.
- g) Number and location of MS4 area outfalls screened for illicit discharges - Please see attached Measurable Goals Matrix Table MCM 3 Illicit Discharge Detection and Elimination.
- h) Number and location of illicit discharges detected - Please see attached Measurable Goals Matrix Table MCM 3 Illicit Discharge Detection and Elimination.
- i) Number and location of illicit discharges eliminated - Please see attached Measurable Goals Matrix Table MCM 3 Illicit Discharge Detection and Elimination.
- j) Number of, and amount of material collected from, hazardous household waste (HHW) collections - Please see attached Measurable Goals Matrix Table MCM 6 Pollution Prevention/Good Housekeeping for Municipal Operations and Appendix E.
- k) Number and location of citizen drop-off centers for automotive fluids - Please see attached Measurable Goals Matrix Table MCM 3 Illicit Discharge Detection and Elimination.
- l) Number or percentage of citizens that participate in HHW collections - Count sheets are completed during the Household Hazardous Waste Collection Day. This number is outlined in the Measurable Goals Matrix Table MCM 6 Pollution Prevention/Good Housekeeping for Municipal Operations and also in Appendix E.
- m) Number of construction sites permitted for storm water quality - Please see attached Measurable Goals Matrix Table MCM 4 Construction Site Storm Water Runoff Control and Appendix C for a Construction Site Status Report.
- n) Number of construction sites inspected - Please see attached Measurable Goals Matrix Table MCM 4 Construction Site Storm Water Runoff Control and Appendix C for a Construction Site Status Report.
- o) Number and type of enforcement actions taken against construction site operators - Please see attached Measurable Goals Matrix Table MCM 4 Construction Site Storm Water Runoff Control.
- p) Number of public informational requests received related to construction sites - No open records requests were received related to construction sites in 2015.
- q) Number, type, and location of structural BMPs implemented - Please see attached Measurable Goals Matrix Table MCM 5 Post – Construction Storm Water Management in New Development and Redevelopment. Please also see Appendix D for the 2015 BMP Status Report.

- r) Number, type, and location of structural BMPs inspected - Please see attached Measurable Goals Matrix Table MCM 5 Post-Construction Storm Water Management in New development and Redevelopment.
- s) Number, type, and location of structural BMPs maintained, or improved - Please see attached Measurable Goals Matrix Table MCM 5 Post-Construction Storm Water Management in New development and Redevelopment.
- t) Type and location of nonstructural BMPs utilized - Please see attached Measurable Goals Matrix Table MCM 4 Construction Site Storm Water Runoff Control
- u) Estimated acreage or square footage of open space preserved and mapped - Unknown acreage or square feet of open space preserved and mapped. Please see the City of Paducah website <http://www.map-gis.org> for ArcGIS aerial photography. The aerial photography was taken in 2013 and has a 0.5 foot resolution. Open spaces can be viewed and measured using ArcGIS software.
- v) Estimated acreage or square footage of mapped pervious and impervious surfaces - An impervious surface layer exists within the City's ArcGIS system. The City has mapped 2079 Acres of Impervious Surfaces. This does not include public roads and sidewalks. Please see the attached CD containing the ArcGIS information.
- w) Number and location of retail gasoline outlets or municipal, state, federal, or institutional refueling areas with implemented BMPs - Not Tracked. The number of spills responded to by emergency personnel are tracked for these locations as well as illicit discharges. Retail gas fueling stations are part of the industrial permitting process through KDOW. KDOW should be tracking this as part of the UST and Groundwater Protection Division. The retail gas stations can be viewed on the ArcGIS aerial photography.
- x) Number and location of entities that have containment for accidental releases - Municipal entities are currently being inventoried for structural and non-structural BMPs. The inventory is currently ongoing and includes containment areas for accidental releases to the MS4. Please see attached Measurable Goals Matrix Table MCM 6 Pollution Prevention/Good Housekeeping for Municipal Operations and the associated chart located in Appendix E for progress on this item.
- y) Estimated acreage or square footage and location where pesticides, herbicides and fertilizers are applied by the entity - Unknown acreage of application. Pesticides, herbicides, and/or fertilizers could be applied at any of the City of Paducah properties, parks, or right of way by personnel with applicable Pesticide/Herbicide license from the Kentucky Division of Agriculture.
- z) Estimated linear feet or percentage and location of unvegetated swales and ditches that have an adequately sized vegetated filter strip - Currently there is an unknown estimated linear feet quantity of unvegetated swales and ditches that have an adequately sized vegetated filter strip. Aerial photography (2013 data) can show the quantity of vegetated ditches and filter strips per parcel, however, that would have to be physically measured in ArcGIS program. Please see Measurable Goals Matrix Table MCM 5 Post-Construction Storm Water Management in New Development and Redevelopment. Please also see the 2015 BMP Status Report located in Appendix D.
- aa) Estimated linear feet or percentage and location of stormwater sewer cleaned or repaired - See the attached Measurable Goals Matrix Table MCM 6 Pollution Prevention/Good Housekeeping for Municipal Operations for the estimated linear feet of separate storm sewers cleaned. There was an estimated 116 linear feet of Driveway pipes installed/repaired.
- bb) Estimated linear feet or percentage and location of roadside shoulders and ditches stabilized – 4355
- cc) Number and location of storm water outfall areas remediated from scouring conditions – None for 2015
- dd) Number and location of de-icing salt and sand storage areas covered or otherwise improved to minimize storm water exposure - One Location / Public Works Facility (1120 North 10th Street)
- ee) Estimated amount, in tons, of salt and sand used for snow and ice control - Zero Tons of Sand Used, Please see Measurable Goals Matrix MCM 6 Pollution Prevention/Good Housekeeping for Municipal Operations.
- ff) Estimated amount of material collected from catch basin, trash rack, or other structural BMP cleaning - Please see attached Measurable Goals Matrix MCM 6 Pollution Prevention/Good Housekeeping for Municipal Operations.
- gg) Estimated amount of material collected from street sweeping - Please see attached Measurable Goals Matrix MCM 6 Pollution Prevention/Good Housekeeping for Municipal Operations.
- hh) Number or percentage and location of canine parks sited at least 150 feet away from a surface water body - The City currently has one canine park located within the City limits. It is located at 175 Stuart Nelson Park Road in the Stuart Nelson Park complex
- ii) Other

13. On-Going Water Quality Characterization Activities

a) Monitoring Data (visual, chemical, and/or biological):

Please see attached Measurable Goals Matrix Table MCM 3 Illicit Discharge Detection and Elimination for illicit discharge monitoring efforts.

b) Other:

Please see the Local Water Resources section of the report.

14. Discuss any problems encountered during this period (include any BMP changes in response to problems encountered).

Not aware of any problems that occurred during this permit year.

15. Identify any new funding source(s) for implementing this permit.

No new funding sources for implementation of the permit occurred during this permit year in comparison with the previous permit year.

16. Provide a summary of complaints received and the follow-up actions taken in reference to storm water quality issues.

The City tracks citizen complaints via the Citizen Complaint Database and the Work Order System. Please see Appendix B for a copy of the Citizen Complaint Database.

17. Implementation status:

a. Are the six minimum control measures being implemented within the compliance schedule and SWQMP timetables?

Yes No*

* If no, submit revised compliance schedule and SWQMP Timetables.

- b. Do you foresee any problems which may affect full implementation of all the measures?

Yes No*

* If yes, explain:

18. Do you have any impaired streams? If so, impaired for what pollutant?

Please refer to the Local Water Resources section of this report for more information on streams within the City of Paducah that are listed in the 305(b) report.

19. TMDL – Do you have a TMDL in your MS4? For which stream segments? What is the impairment?

The City of Paducah currently does not have a TMDL within the City. Please refer to the Local Water Resources section of this report for more information on streams within the City of Paducah that are listed in the 305(b) report.

20. What can the Division of Water do to assist you with program compliance?

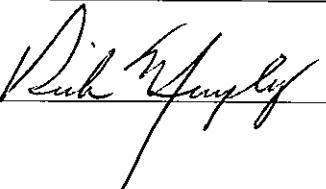
The Division of Water does a great job of keeping the sMS4 communities up to date with what is going on with regulations, workshops, conferences, etc. One item that may benefit sMS4 coordinators with the help of KDW would be for the agency to host online webinars dealing with the different minimum control measures and how communities in Kentucky can improve their program. Online webinars are a convenient way to reach all coordinators throughout the State. The agency could impose a small fee for participation in these webinars and they could count as training for the coordinators.

PART E: CERTIFICATION AND SIGNATURE

- The individual completing this report, listed in "PART A: GENERAL INFORMATION – MS4 OPERATOR" must sign the following certification statement:

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

Type or Print Name: Rick Murphy, P.E.

Signature: 

Date: 01/27/2016
(mm/dd/year)

City of Paducah
2015 Annual Compliance Report

Task	BMP-Activity Description	Objective – 2015 Status	Measures of Success - 2015 Numbers	Responsible Parties
1		<p>Provide updates at least twice per calendar year.</p> <ul style="list-style-type: none"> On January 27th a Municipal Order was approved to apply for a Keep America Beautiful-Cigarette Litter prevention grant. Funds would be used to raise awareness of the impact of cigarette littering, placing ash receptacles in the downtown area, and distributing portable ashtrays to smokers. This would limit the amount of litter that migrates to storm inlets/sewers. On February 24th the City Manager updated on the plans underway for curbside recycling program. On March 10th, Joint Sewer Agency Executive Director updated the commission on Paducah's Consent Decree with KDOW and the EPA in addressing combined sewer overflows and sanitary sewer overflows. One of these projects underway is the Wallace Park Subdivision which is 45% at this time. The City Engineer also updated the commission on the crest of the Ohio River and explanation of when the flood gates are installed. On March 24th the Public Information Officer updated on the recycling drop-off location with Republic Service and times drop offs are accepted. The Mayor and Commissioners also introduced an ordinance to amend the 	<p>Number of attendees.</p> <ul style="list-style-type: none"> January 27th – Approximately 20 Attendees February 24th – Approximately 20 Attendees March 10th – Approximately 35 Attendees March 24th – Approximately 52 Attendees March 31st – Approximately 21 Attendees On April 21st – Approximately 20 Attendees On May 19th – Approximately 20 Attendees On June 16th – Approximately 21 Attendees On July 14th – Approximately 75 Attendees On August 4th – Approximately 22 Attendees 	<p>EPW/JSA/Planning</p> <p>X X X X X</p>

City of Paducah
2015 Annual Compliance Report

Task	BMP- Activity Description	Objective – 2015 Status	Measures of Success - 2015 Numbers	Responsible Parties
1	Provide updates at least twice per calendar year. (cont'd)	<p>design agreement approved Feb. 13 with the USACE for projects to rehabilitate the floodwall. Additionally, there was a municipal order approved to apply for the 2015-2016 Household Hazardous Waste Grant through Kentucky Division of Waste Management; this fund would be used for the annual Spring Clean-up Day for City/County residents.</p> <ul style="list-style-type: none"> On April 21st the Mayor issued a proclamation proclaiming April 22nd as Earth Day. On May 19th an ordinance was approved to purchase one front loading refuse truck, one side arm loading refuse truck, and payment to AES Environmental, LLC for the collection of household hazardous waste during the Spring Clean-up Day. On June 16th an ordinance was approved for an agreement with an engineering firm to assist the City in preparing and evaluating a request for proposal for a new contract for a solid waste transfer station and related solid waste services. On July 14th, citizens addressed their concerns about the City's storm water system after the flash flooding 	<p>Number of attendees.</p> <ul style="list-style-type: none"> On August 25th – Approximately 38 Attendees On September 22nd – Approximately 20 Attendees On October 6th – Approximately 23 Attendees On October 13th – Approximately 20 Attendees On October 27th – Approximately 21 Attendees On December 8th – Approximately 28 Attendees 	EPW /JSA/ Planning

City of Paducah
2015 Annual Compliance Report

Task	BMP- Activity Description	Objective – 2015 Status	Measures of Success - 2015 Numbers	Responsible Parties
1		<p>Provide updates at least twice per calendar year. (cont'd)</p> <p>that resulted from the record rainfall event that occurred on July 7th. The City Manager recommended that the City commit to assessing the system and developing a plan for upgrades. The City Manager also suggested to create an advisory committee for this process and wants the City to review various funding mechanisms for the upgrades. The City waived its fees for collecting flood damaged items placed curbside. An ordinance was introduced for the purchase of a sewer pump truck of which will replace an 11 year old sewer pumper truck.</p> <ul style="list-style-type: none"> On August 4th the Mayor proclaimed August 11 as Underground Damage Prevention Day to encourage folks to use the 811 to locate underground utilities before digging. On August 25th the City Manager stated that he will be meeting with Engineering and Public Works Department for the request for qualification on an assessment of the City's storm water system. Staff is also researching financing tools including a storm water management fee. On September 22nd, the Paducah Board of Commissioners approved a municipal order for a memorandum of 	<p>EPW/JSA/ Planning</p> <p>X X X X X</p>	

City of Paducah
2015 Annual Compliance Report

Task	BMP-Activity Description	Objective – 2015 Status	Measures of Success - 2015 Numbers	Responsible Parties
1		<p>Provide updates at least twice per calendar year. (cont'd)</p> <p>understanding between the City and the U.S. Army Corps of Engineers regarding the Ohio River Shoreline reconstruction project. This MOU allows the City to pursue specific rehabilitation projects on the floodwall and receive in-kind credit from USACE. The City has requested authorization to rebuild two pumps at Pump Station #9, rehab/replace/remove flap gates, and seal eight obsolete floodwall openings.</p> <ul style="list-style-type: none"> On October 6th, an ordinance was approved to purchase a street sweeper and a side loading refuse truck. On October 13th, an ordinance was approved accepting the Port Security Grant Award for the purchase of equipment to extend video surveillance coverage of the floodwall and downtown infrastructure. On October 27th, a municipal order was approved to apply for the 2016 Litter Abatement grant through Kentucky Division of Waste Management. On December 8th, the City Manager updated the Board of Commissioners regarding the review of proposals for *Information about the City Commission can be found at: http://www.paducahky.gov/paducah/city-commission-meeting-information 		<p>EPW /JSA Planning</p> <p>X X X X X</p>

City of Paducah 2015 Annual Compliance Report

Task	BMP- Activity Description	Objective – 2015 Status	Measures of Success - 2015 Numbers	MEASURES OF SUCCESS - 2015			
				1-13	14-25	26-35	36-45
1		<p>Hold at least one meeting per calendar year.</p> <ul style="list-style-type: none"> The City of Paducah hosted the Four Rivers Basin Team Meeting on April 23rd in the commission chamber. Members of City staff were present for the meeting along with Joint Sewer Agency Director who gave a presentation on CSOs and their initiative in addressing them. See Appendix A for Meeting Agenda and Minutes. Storm Water & Drainage Engineer attended the Jackson Purchase Foundation meeting on April 24th at Benton City Hall. See Appendix A for Meeting Agenda & 2015 Plan of Work. City of Paducah Hosted the Jackson Purchase Foundation annual meeting on September 25th in the City Hall Training Room. Members of City staff were present for the meeting. See Appendix A for Meeting Minutes. Meeting was held with City Engineer, City Manager, & Storm Water & Drainage Engineer to discuss storm water master plan and how the City is going to move forward on this. Meeting was held with City Manager, Public Information Officer, and Storm Water and Drainage Engineer in regards to public education and outreach for sMS4 permit. 	<p>Number of attendees.</p> <ul style="list-style-type: none"> April 23rd – Approximately 25 attendees April 24th – Approximately 25 attendees Meeting September 25th – Approximately 30 attendees <p>Number of workshops.</p>	X	X	X	X

City of Paducah
2015 Annual Compliance Report

Task	BMP- Activity Description	Objective - 2015 Status	Measures of Success - 2015 Numbers	Responsible Parties
1	Distribute educational materials including pamphlets, brochures, and leaflets, reminding the general public of their responsibilities associated with the storm water system	<p>Distribute education materials at one public event per year. Utilizing KYTC Storm water toolkit materials as guidance or other effective equivalents.</p> <p>Educational materials will focus on pollutants threatening local waterways.</p>	<p>Number of brochures, pamphlets, and leaflets distributed at BBQ on the River.</p> <ul style="list-style-type: none"> The City of Paducah helped sponsor the ORSANCO/Friends of the Ohio River Aquarium and information booth at the 2015 Barbeque on the River Festival held September 24th-26th. See Appendix A for pictures and communication of the City's sponsorship of this event. Handouts/pamphlets were provided of which included the following: storm water pollutants, septic systems, and sanitary systems. 	EPW /JSAV Planning X X X X

City of Paducah
2015 Annual Compliance Report

Task	BMP- Activity Description	Objective - 2015 Status	Measures of Success - 2015 Numbers	Responsible Parties							
2		<p>Update the messages on the City website at least once during the 2010-2015 permit cycle.</p> <ul style="list-style-type: none"> The City of Paducah website provides information on erosion control plans, state and local permits, construction inspection forms, site plan requirements, storm water management, and other various storm water related information. The City of Paducah updated the Storm Water Phase II Website in 2012 to include a section about flood prevention. This section includes information about the Flood Prevention Ordinances, Flood Insurance Rate Maps and Studies, Special Flood Hazard Area development permits, elevation and flood-proofing certificates, and other additional information. The City website address is http://www.paducahky.gov/ <p>Include storm water and environmental messages on the City website.</p>	<p>Number of hits on storm water webpage.</p> <ul style="list-style-type: none"> The City of Paducah Storm Water Phase II Webpage had 498 hits in 2015. The City of Paducah Flood Prevention Webpage had 436 hits for 2015. The City of Paducah Floodwall Webpage had 1143 hits for 2015. The City of Paducah Recycling Webpage had 5642 hits for 2015. The City of Paducah Leaf Collection Webpage had 772 hits for 2015. 	PIO							

City of Paducah
2015 Annual Compliance Report

Task	BMP- Activity Description	Objective - 2015 Status	Measures of Success - 2015 Numbers	Responsible Parties
3	<p>Utilize various media sources including radio, public service announcements, public access television, and newspaper articles to convey messages about the impacts of storm water runoff on local water quality.</p>	<p>Have messages on various media sources by the end of the permit cycle.</p> <ul style="list-style-type: none"> The City of Paducah website has links to route people to the Storm Water Phase II section of the website. The Paducah Sun (local newspaper) and West KY Star (local newspaper) reported on various activities that affect storm water quality. The City Commission meetings are shown on public access television. Presentations and discussions at meetings relating to the City's storm water program provide an opportunity to educate the public. The City Commission meetings are also posted on YouTube. The City Public Information Officer (PIO) issues public service announcements (PSA) and news releases to the community. The City has commission meeting highlights and agendas posted on the City website. In the Paducah region, various radio and television ads were advertised by the KYTC for storm water pollution. The City of Paducah's website is http://www.paducahky.gov. Various information about City sponsored events also can be found on the City's Facebook and Twitter page 	<p>Number of advertisements/ announcements per year.</p>	<p>EPW /PIO</p> <p>X X X X X</p>

**City of Paducah
2015 Annual Compliance Report**

Task	BMP- Activity Description	Objective - 2015 Status	Measures of Success - 2015 Numbers	Responsible Parties
4	<p>Reach out to different levels of school children by the end of the permit cycle.</p> <ul style="list-style-type: none"> • The City of Paducah usually holds an Arbor Day Event at Noble Park of which school children are asked to participate for the Pennies for Trees project. See Appendix A for News Release. • Storm Water and Drainage Engineer met with McCracken County Cooperative Extension Office agent on future educational events that the City could partner with including; environmental field days, facility tours, help with busing to environmental events, etc. This is to accomplished during 2016 permit cycle. • The Storm Water and Drainage Engineer met with Living Lands and Waters who performed an Ohio River Bank cleanup in the Paducah Area. The organization did seminars for all ages. The public was offered free tours of their barge and to see what they had collected from the river banks of Paducah. The City communicated with Living Lands and Waters that they would be interested in partnering with the organization in future events. See Appendix A for pictures, communication and itemized list of items removed from the river bank. 	<p>Number of activities per year.</p> <ul style="list-style-type: none"> • 1 Activity, Activities of event listed in News Release for event in Appendix A for Pennies for Trees Event. 	<p>Number of school children reached.</p> <ul style="list-style-type: none"> • Unknown 	<p>PIO/ EPW</p>

City of Paducah 2015 Annual Compliance Report

Task	BMP- Activity Description	Objective - 2015 Status	Measures of Success - 2015 Numbers	Responsible Parties
5	Measure the targeted audience understanding of their impacts on water quality and the adoption of the behavior changes resulting from public education and outreach efforts.	<p>Provide questionnaire for the public to take at local events.</p> <ul style="list-style-type: none"> This will be part of the MS4 Program Monitoring Plan. 	<ul style="list-style-type: none"> Questionnaire is under development for public events. See Appendix A for draft. 	EPW

City of Paducah
2015 Annual Compliance Report

Task	BMP- Activity Description	Objective - 2015 Status	Measures of Success - 2015 Numbers	Responsible Parties
1	Sponsor The Ohio River Sweep.	<p>Have city employees aid in the event.</p> <ul style="list-style-type: none"> The City of Paducah Engineering Public Works Department provided free dumpster delivery and free dump fees for the ORSANCO River Sweep held June 20th. See Appendix A for pictures and communication of the City's sponsorship of this event. The Storm Water and Drainage Engineer visited the Living Lands and Waters Barge Operation while they performed a river sweep in Paducah. Contact was made with the organization that the City would like to help sponsor this event in the future. See Appendix A for pictures, communication organization and itemized list of items removed from the river bank. 	<p>Number of participants in the event.</p> <ul style="list-style-type: none"> On June 20th, Approximately 7 people helped in the event of which collected approximately 15 thirty-gallon bags of garbage & debris from the river banks starting at Kentucky Avenue in Downtown Paducah and ending at the new boat ramp location. <p>Annual sponsorship.</p> <ul style="list-style-type: none"> City of Paducah Solid Waste Division aided in the event by providing a free dumpster and the City did not require a permit for this event. 	<p>EPW</p> <p>X X X X</p>

City of Paducah
2015 Annual Compliance Report

Task	BMP- Activity Description	Objective - 2015 Status	Measures of Success - 2015 Numbers	Responsible Parties
2	Support storm drain stenciling program. (Citizen Volunteers)	<p>Promote an organization to participate in a storm drain stenciling program at least once during the 2010-2015 permit cycle.</p> <ul style="list-style-type: none"> An organization was promoted to participate in a storm drain stenciling program this permit year by AEP River Operations. The City offered free permit fees and met with AEP River Operations on the stenciling placement. The City has storm drains stenciled in the downtown area, but an unknown amount. 	<p>Number of storm drains stenciled/markd annually.</p> <ul style="list-style-type: none"> Storm drain stenciling was permitted for 6 blocks along Broadway, KY Ave, and Jefferson Street in downtown. See Appendix A for permit issued. 	EPW
3	Provide status updates and solicit inputs from the Storm Water Advisory Committee (SWAC) on the MS4 program.	Hold a meeting at least twice per permit cycle.	<p>Number of attendees, SWAC input.</p> <ul style="list-style-type: none"> A meeting with the Storm Water Advisory Committee was not held during this permit year. However, a meeting was held with the City Manager, City Engineer, & Storm Water and Drainage Engineer to discuss the initial process of developing a storm water master plan. The SWAC is used primarily when ordinances are going to change and solicit their input on proposed changes. The City Manager is putting together a new storm water advisory committee of which will be oversight for the future Storm Water Master Plan. 	EPW

City of Paducah
2015 Annual Compliance Report

Task	BMP-Activity Description	Objective - 2015 Status	Measures of Success - 2015 Numbers	Responsible Parties
4	Comply with state and local notification requirements.	<p>Comply with the state and local public notice requirements.</p> <ul style="list-style-type: none"> Agendas for the City Commission meetings are posted on the City website and at City Hall before commission meetings. The date and time of City Commission meetings are advertised in the local paper, The Paducah Sun. The agendas are also distributed to The Paducah Sun. 	Comply with public notice requirements as defined under KRS 424 and the City of Paducah code of Ordinances chapter 2-179 when public notices or meetings are to be held.	PIO X
5	Continue to implement a method of advertising the public involvement opportunities.	Post opportunities at the existing City of Paducah website. Send out Public Service Announcements and News Releases utilizing PIO.	<p>Number of Advertisements per year.</p> <ul style="list-style-type: none"> 6 events were posted on the 2015 calendar for storm water related activities. See Appendix A for a calendar of events. 	PIO X

**City of Paducah
2015 Annual Compliance Report**

Task	BMP- Activity Description	Objective - 2015 Status	Measures of Success - 2015 Numbers	Responsible Parties
6	Bonus BMP for 2015 – Not Identified By SWQMP. Community Garden	The City utilizes an area of undeveloped property for a Community Garden in the Fountain Avenue neighborhood. Water is available at the site. Lots are approximately 12'x8'. The Community Garden allows residents to get involved in planting gardens in which plants can be used to reduce runoff to the storm sewer system. There are 40 total lots in the garden.	Number of Lots Rented • 40 lots were available for rent and 9 were rented out.	Parks
7	Bonus BMP for 2015 – Not Identified By SWQMP Prescription Drug Drop Off Location	Prescription Drugs were collected by law enforcement during the Drug Take-Back Events held April 18 th & Sept. 27 th 2015. The City of Paducah Police Department also has a drop box in the Police Department lobby for unused prescription drug medication.	Amount of Prescription Drugs Disposed • The City of Paducah Police Department collected 524 lbs. of prescription drugs in the drop box for 2015.	Paducah Police Department

City of Paducah

2015 Annual Compliance Report

Task	BMP-Activity Description	Objective - 2015 Status	Measures of Success - 2015 Numbers	Responsible Parties
1	<p>Update the storm sewer map each year. Provide all known major outfalls. In the event new major outfalls are found after permit year two they will be mapped accordingly.</p> <ul style="list-style-type: none"> Known outfalls are mapped accordingly. They are depicted on the storm sewer map, see Appendix B. In the event new outfalls are found, they will be mapped accordingly. Please see the attached CD for a current inventory in Appendix B. The identify tool in the ArcGIS program can be used to identify pipe characteristics. Also, utilizing the open attributes table, a person can sort the outfalls by size, material, last IDDE inspection, etc. Of the 824 Mapped Outlets 220 are 36" or greater. 169 of the 220 outlets are not City MS4 outfalls. 11 out of 169 are CSO outfalls. 41 out of 169 are State MS4 outfalls. 7 out of 169 are railroad pipes. 5 out of 169 are pipes discharging into a pump station. 4 out of 169 are the Island Creek Pump Station Pipes. 57 out of 169 are instream/ditch single conveyances. 5 out of 169 are private systems discharging to the State MS4. 32 out of 169 are private systems discharging into private controlled ditches/and or Waters of the Commonwealth. 2 are smaller pipes discharging to large cross drain for. 4 out of 169 are County pipes and 1 was not located. <p>Perform storm water outfall location and mapping program.</p>	<p>Number of outfall structures mapped. As of December 31, 2015 the City of Paducah has mapped:</p> <ul style="list-style-type: none"> • 824 Outlets • 6,399 Inlets • 590,618 Linear Feet of Separate Storm Sewer • 22,269 Linear Feet of Culvert Pipes • 306,513 Linear Feet of Combined Sewer <p>EPW</p>	X X X X	<p>Although the Combined Sewer System is not part of the sMS4 Program it is an integral part of the City of Paducah drainage system.</p> <p>The MS4 Boundary is the City of Paducah City Limits.</p>

City of Paducah
2015 Annual Compliance Report

Task	BMP- Activity Description	Objective - 2015 Status	Measures of Success - 2015 Numbers	Responsible Parties
2		<p>Utilize an existing illicit discharge screening database in GIS program.</p> <p>Conduct dry weather screening with the ultimate goal of visually inspecting 20% of the major outfalls in the sMS4 system or inspecting representative outfalls.</p> <ul style="list-style-type: none"> The City of Paducah inspected outfalls, inlets, and stream banks for illicit discharges. The City of Paducah has an illicit discharge screening database in the GIS program. Locations of illicit discharge screenings at inlet and outlet locations are tracked by utilizing the ArcGIS system. An inlet/outlet feature can be identified to view illicit discharge screening activities. Inlets and outlets are also assigned map identification numbers to help field personnel identify a specific inlet/outlet location. Map identification numbers are still being developed for inlets and outlets throughout the storm sewer system. See Appendix B for a map of the outfalls that were inspected and pictures related to each outfall. 	<p>Number of major outfalls visited and screened for illicit discharges. Linear feet of stream banks and shorelines walked for identifying and locating outfalls.</p> <ul style="list-style-type: none"> 14 of the 51 Major Outfalls were screened for Illicit Discharges which account for 27% of total major outfalls inspected for 2015. 90 Inlets were screened for Illicit Discharges. 9,339 Linear feet of stream banks and shorelines were walked for identifying and locating outfalls. (Cross Creek & Crooked Creek) Since 2011 approximately 90% of City MS4 major outfalls have been screened for illicit discharges. 	EPW

City of Paducah
2015 Annual Compliance Report

Task	BMP- Activity Description	Objective - 2015 Status	Measures of Success - 2015 Numbers	Responsible Parties
3		<p>Create a complaint database in the Engineering Department. Field personnel immediately follow up on suspected violations. Conduct visual screening. Conduct grab sample if necessary.</p> <p>Engineering and Public Works to contact Division of Water in severe or urgent water quality impairment issues.</p> <p>Continue to implement procedures to receive illicit discharge complaint calls and conduct follow-up inspections.</p>	<p>Number of complaints received.</p> <ul style="list-style-type: none"> • 1 complaint received regarding odor control. • 122 complaints received regarding storm water. <p>Number of complaints investigated.</p> <ul style="list-style-type: none"> • As citizen complaints about storm water issues were received by the EPW Department, they were logged into an Excel Spreadsheet • See Appendix B for Citizen Complaint Database. 	<p>EPW</p> <p>X X X X X</p> <p>Number of complaints investigated.</p> <ul style="list-style-type: none"> • The odor complaint was investigated immediately. • All storm water complaints and questions on new development were investigated by a field visit.

City of Paducah
2015 Annual Compliance Report

Task	BMP- Activity Description	Objective - 2015 Status	Measures of Success - 2015 Numbers	Responsible Parties	2015	2016	2017	2018	2019	2020	2021
					EPW						
4		<p>Utilize GIS Mapping, zoning maps, and previous Illicit Discharge complaints/notices of violation to identify priority areas likely to have Illicit Discharges.</p> <ul style="list-style-type: none"> A drainage ownership layer is in the development stages. This layer is to be used for aid in maintenance and drainage area responsibilities, and illicit discharge tracking. A storm water management layer is in the development stages to track site storm water management and enable quick viewing of sites that have previously been analyzed for storm water requirements. A watershed layer exists in the ArcGIS program to aid in tracking illicit discharges and is also used to determine the drainage area discharging to or through a drainage pipe or ditch. The City of Paducah has an IDDE plan in place. The current plan is to utilize the book <i>"Illicit Discharge Detection and Elimination A Guidance Manual for Program Development and Technical Assessments"</i>, field inspection, utilize existing GIS mapping, and enforce existing ordinances. Although mapping procedures are under development, Illicit Discharge Detection and Elimination Activities are still being conducted. <p>Continue to implement procedures to locate priority areas likely to have illicit discharges.</p>	<p>Have priority areas mapped and known major outfalls in priority areas visually inspected by the end of the permit cycle.</p> <ul style="list-style-type: none"> Priority areas have been mapped. The City of Paducah has mapped impervious surfaces for non-residential properties to aid in illicit discharge information. Priority Areas are identified by the region associated with non-residential or residential developments, past illicit discharge complaints, watershed patterns, and type of drainage system. See Appendix B for Map GIS CD. 		X	X	X	X	X	X	

City of Paducah
2015 Annual Compliance Report

Task	BMP- Activity Description	Objective - 2015 Status	Measures of Success - 2015 Numbers	Responsible Parties	YEAR					
					2015	2014	2013	2012	2011	2010
5	Conduct illicit discharge detection and elimination.	<ul style="list-style-type: none"> Perform illicit discharge inspections during dry weather events. Illicit discharge inspections are conducted during dry weather events. Illicit discharge screening at inlets and outlets are tracked by the ArcGIS system. 	<p>Number of illicit discharge inspections performed. Number of illicit discharge detections.</p> <ul style="list-style-type: none"> • 113 illicit discharge inspections performed. • Zero illicit discharges were found during site inspections. <p>Number of illicit discharge eliminations.</p> <ul style="list-style-type: none"> • Two illicit discharge elimination actions were conducted. 	EPW	X	X	X	X	X	

City of Paducah
2015 Annual Compliance Report

Task	BMP- Activity Description	Objective - 2015 Status	Measures of Success - 2015 Numbers	Responsible Parties
6	<p>Enforce existing illicit discharge ordinance.</p> <ul style="list-style-type: none"> The City enforces existing Illicit Discharge Ordinances that prohibit illicit discharges to the storm sewer system and establishes enforcement provisions to ensure compliance with storm water regulations. City Ordinance states: "The elimination of an illicit discharge within three days after receipt of notice of violation from the city shall be considered compliance with the provisions of this article and no further action shall be taken. Written permission given to the City Engineer and/or enforcement agency for the removal of the illicit discharge and/or illicit discharge sources on the premises on which it is located shall be considered compliance with the provisions of this section and no further action shall be taken against the party, except for the collection of all costs, expenses and/or charges for the removal of the nuisance." The existing illicit discharge ordinance calls for the immediate abatement of identified illicit discharges that are an immediate threat to the health, safety, and well-being of the public. 	<p>Number of notices of violation issued.</p> <ul style="list-style-type: none"> One notice of violations was issued for an illicit discharge. <p>Number of follow up actions.</p> <ul style="list-style-type: none"> Two follow up actions were conducted due to illicit discharges. <p>Number of abatements.</p> <ul style="list-style-type: none"> Investigations are conducted immediately on the odor complaints. However a verbal was given to the establishment who self-reported a leaky grease tank and had it fixed/cleaned up immediately. 	EPW	X X X X X

City of Paducah
2015 Annual Compliance Report

Task	BMP-Activity Description	Objective - 2015 Status	Measures of Success - 2015 Numbers	Responsible Parties	YEAR	YEAR	YEAR	YEAR	YEAR	YEAR
					1 PY 10- 11- 12	2 PY 11- 12	3 PY 12- 13	4 PY 13- 14	5 PY 14- 15	
Activities/Activities										
7	Continue to initiate illicit discharge education efforts (such as bill inserts, brochures, etc.)	Distribute illicit discharge information. <ul style="list-style-type: none"> Illicit discharge information was distributed at the 2015 Barbeque on the River Festival held September 24th-26th. 	Number of brochures distributed. <ul style="list-style-type: none"> 20 handouts were provided on illicit discharges and how to prevent them from occurring. See Appendix B for copies of these handouts. 	EPW	X	X	X	X	X	
8	Continue sanitary sewer inspections.	Inspect sanitary sewers on an as needed basis. <ul style="list-style-type: none"> Sanitary sewers are inspected by the Paducah-McCracken County Joint Sewer Agency. The Agency is separate from the City of Paducah. Sanitary sewers are inspected utilizing smoke testing and video camera to look for illicit connections. JSA rehabilitated 5,025 Linear Feet of Sanitary/Combination Sewers. See Appendix B for JSA rehabilitation summary. JSA had a total of 542 Manhole Inspections and rehabbed 30 Manholes. 	Linear feet of sewer system inspected annually. <ul style="list-style-type: none"> The JSA cleaned and video inspected 173,305 feet. Root cutting remediation was performed on 2,023 linear feet of sanitary/combined sewers. 	JSA	X	X	X	X	X	

City of Paducah
2015 Annual Compliance Report

Task	BMP- Activity Description	Objective – 2015 Status	Measures of Success - 2015 Numbers	Responsible Parties
9	Provide training for municipal field staff in identification and reporting of illicit discharges.	<p>Hold two training sessions per permit cycle.</p> <ul style="list-style-type: none"> A formal training session was not held this permit year for illicit discharge detection and elimination. However, the Storm Water & Drainage Engineer met with the Street Department two occasions to discuss illicit discharges. The sewer pump truck had found a citizen was dumping grease into a storm drain and we met on site to review (a NOV with fine was issued). See Appendix B for NOV issued and pictures. The illicit discharge from a malfunctioning grease tank in the downtown area was reviewed with the Streets Superintendent (NOV was not issued, owner self-reported and cleaned up). 	<p>Number of Attendees</p> <ul style="list-style-type: none"> Field meetings held and there were 5 different individuals involved. <p>EPW</p>	<p>X</p> <p>X</p>
10	Report or Discovery of Illicit Connections by the City of Paducah/JSA.	Report Source and Party Responsible for connection. Coordinate with Utility Companies. Report Activities of corrective Action.	<p>Number of reports or discoveries.</p> <ul style="list-style-type: none"> No reports or discoveries of illicit connections were made by the City of Paducah. 	<p>EPW/JSA</p> <p>X</p> <p>X</p> <p>X</p>

City of Paducah
2015 Annual Compliance Report

Task	BMP- Activity Description	Objective - 2015 Status	Measures of Success - 2015 Numbers	Responsible Parties	YEAR	YEAR	YEAR	YEAR	YEAR	YEAR
					2015	2014	2013	2012	2011	2010
11	Have mechanism and protocols in place that provide for the public reporting of spills and other discharges (Advertisement).	Advertise on city SMS4 website by April 1, 2011 about spills and where they can be reported.	<ul style="list-style-type: none"> • The City continues to advertise on the City SMS4 website to inform the public where they can report spills. • Industrial permitted site discharges are not tracked. They have their own permit and must follow their own set of permit requirements. However, they are inspected for illicit discharges. • The City will track spill incidents responded to by emergency personnel and EPW. 	EPW	X	X	X	X	X	X
12	Bonus BMP- Not Identified In SWQMP Automotive Fluid Drop Off Locations	Automotive Fluid Drop Off Locations provide a potential reduction in illicit discharges. Residents can bring their automotive fluids to certain businesses for disposal. This BMP was upon request by KY Division of Water.	<ul style="list-style-type: none"> • Advance Auto Parts – 2828 Park Avenue 3324 Irvin Cobb Drive 5124 Hinkleville Road • AutoZone – 2809 Jackson Street 	Private Organization	X	X	X	X	X	X

City of Paducah
2015 Annual Compliance Report

Task	BMP- Activity Description	Objective - 2015 Status	Measures of Success - 2015 Numbers	Responsible Parties
12	Bonus BMP- Not Identified In SWQMP Automotive Fluid Drop Off Locations	Automotive Fluid Drop Off Locations provide a potential reduction in illicit discharges. Residents can bring their automotive fluids to certain businesses for disposal. This BMP was upon request by KY Division of Water.	Number and Location of Automotive Fluid Drop Off Centers cont'd 3115 Irvin Cobb Drive • CWI- 829 Burnett Street • O'Reilly's- 2575 Irvin Cobb Drive 2820 Jackson Street • Wal-Mart 3220 Irvin Cobb Drive 5130 Hinkleville Road	Private Organization X X X X

**City of Paducah
2015 Annual Compliance Report**

Task	BMP- Activity Description	Objective - 2015 Status	Measures of Success - 2015 Numbers	Responsible Parties	EPW EPSC Permit Ordinance	EPW EPSC Permit Ordinance
1 Continue to implement requirements for construction site operators to implement appropriate erosion and sediment control best management practices (BMPs) that, at a minimum be as protective as Kentucky's General Permit for Stormwater Construction Sites (KYR100000).	Review and/or Update City Ordinances by April 1, 2012 to reflect updates to KYR 100000.	<ul style="list-style-type: none"> The City Ordinances were reviewed during the 2010-2011 permit year. It was determined that the City believes that City Ordinances are as protective as Kentucky's General Permit for Stormwater Construction Sites. This is due to the fact that the City of Paducah Erosion Prevention and Sediment Control/Land Disturbance/Grading Permit has the same permit triggers as the KYR 100000. The City Ordinance allows for the City to approve an EPSC Plan and Permit with conditions. Therefore, the permits and plans are reviewed and approved subject to KYR 100000 permit conditions. 	<ul style="list-style-type: none"> City Ordinances are as protective as KYR 100000. City believes that ordinances are as protective as the current KYR 100000. EPSC Plans and Permit are enforceable by ordinance. 	EPW	<ul style="list-style-type: none"> X X X X 	<ul style="list-style-type: none"> X X X X
2 Continue to implement requirements for construction site operators to control waste at the construction site that may cause adverse impacts to water quality.	Review and/or Update City Ordinances by April 1, 2012 to meet this BMP.	Continue to implement requirements for construction site operators to control waste at the construction site that may cause adverse impacts to water quality.	City Ordinances meet this BMP.	<ul style="list-style-type: none"> City believes that ordinances meet this BMP due to the fact that City EPSC permits are enforceable by ordinance. 	EPW	<ul style="list-style-type: none"> X X X X

City of Paducah 2015 Annual Compliance Report

Task	BMP- Activity Description	Objective - 2015 Status	Measures of Success - 2015 Numbers	Responsible Parties	YEAR	YEAR	YEAR	YEAR	YEAR	YEAR
					2015	2016	2017	2018	2019	2020
Requirement that discharges from construction sites to high quality waters will protect existing in-stream water uses and the level of water quality necessary to protect existing in-stream water uses consistent with the KYR 100000.	Update City Ordinances by April 1, 2012 to meet BMP for High Quality Water.	<p>City Ordinances meet this BMP.</p> <ul style="list-style-type: none"> The City Ordinances were reviewed during the 2010-2011 permit year due to the new permit requirements of the KYG 200000. This requirement is addressed in the KYR 100000 Fact Sheet Pages 23-26. When EPSC Plans and Permits are reviewed and issued, they are approved subject to the conditions of the KYR 100000. Therefore, Ordinances meet this BMP. 	X	X	X	X	X	X	X	X

City of Paducah
2015 Annual Compliance Report

Task	BMP- Activity Description	Objective - 2015 Status	Measures of Success - 2015 Numbers	Responsible Parties	YEAR	YEAR	YEAR	YEAR	YEAR	YEAR
					1	2	3	4	5	6
1	Conduct plan review of construction plans.	Make sure erosion control measures are shown where applicable in construction plans and consider potential water-quality impacts.	<ul style="list-style-type: none"> The Engineering Department performs reviews of construction plans. Projects that were required to be covered by permits as established by the provisions in the Erosion Prevention and Sediment Control Ordinance were issued City of Paducah EPSC Permits. Currently, site plans are reviewed for potential water-quality impacts and erosion control impacts. 	Number of site plans reviewed. <ul style="list-style-type: none"> In the 2015 permit year, 29 site plans were reviewed. 	EPW	X	X	X	X	X
2	Requirements for demonstration that a Notice of Intent for KYR 100000 has been filed for applicable KPDES sites.	Require copy of eNOI submitted to KDOW or copy of response from KYR 100000 prior to issuing City EPSC Permit.	<ul style="list-style-type: none"> By City Ordinance Chapter 50 Article IV Section 50-174(e), a copy of the NOI is required prior to issuance of the City EPSC permit. A completed eNOI copy or a confirmation email is sufficient for issuance of the City EPSC Permit. 	Number of land disturbance permits issued. <ul style="list-style-type: none"> 12 i. Land disturbance permits were issued during the 2015 permit year. A copy of a blank permit can be found in Appendix C. 	EPW	X	X	X	X	X

City of Paducah
2015 Annual Compliance Report

Task	BMP- Activity Description	Objective - 2015 Status	Measures of Success - 2015 Numbers	Responsible Parties	YEAR	YEAR	YEAR	YEAR	YEAR
					1	2	3	4	5
3	Inspect EPSC Permit Site Compliance	<p>Inspect construction sites to ensure that BMPs are properly installed and maintained. All new sites within two weeks after initiation of land disturbance and monthly on active sites.</p> <ul style="list-style-type: none"> Based on the EPSC Permits that were issued by the Engineering Department and construction sites that did not meet the requirements of the EPSC permit requirements but had an associated site plan were periodically inspected for erosion control measures. Sites were inspected once every two weeks to once every couple months depending on the site's activity. See Appendix C for a 2015 Construction Site Inspection Report. <p>Perform periodic construction site inspections specific to SMS4 Phase II requirements.</p>	<p>Number of site inspections performed.</p> <ul style="list-style-type: none"> 96 site inspections (of which includes 35 final site inspections for past projects that we had not received a Notice of Termination on) were performed during the 2015 permit year. A copy of a blank Construction Site Inspection Form can be found in Appendix C. 	EPW/Fire Prevention	X	X	X	X	X

City of Paducah
2015 Annual Compliance Report

Task	BMP- Activity Description	Objective - 2015 Status	Measures of Success - 2015 Numbers	Responsible Parties	YEAR	YEAR	YEAR	YEAR	YEAR
					1	2	3	4	5
4	Enforce requirements of City Ordinances Chapter 50 Art III and Chapter 50 Art IV.	Ensure that construction sites are in compliance with the site's applicable erosion control, storm water management, and/or BMP plan.	<ul style="list-style-type: none"> During site inspections, inspection reports, BMPs, outfalls, adjacent creeks, etc. are inspected for deficiencies. If deficiencies are found, they are noted in our inspection report to the contractor/permittee. If the deficiencies are not corrected within the allotted time frame, a Notice of Violation is issued to the permittee. Four Notice of Violations were issued on sites tracking mud and debris onto City streets and filling in a ditch. Subsequent inspections were performed; the streets were cleared of the dirt and debris and the ditch was restored to original grade. 	Number of notice of violations issued. <ul style="list-style-type: none"> 4 Notice of Violations were issued. See Appendix C for photos with NOV letters. 	Fire Prevention/EPW	X	X	X	X
5	Continue to implement procedures for receiving and tracking customer complaints about construction sites.	Utilize created citizen complaint database in the Engineering Department.	<ul style="list-style-type: none"> A citizen complaint database is utilized in the Engineering Department to track citizen complaints about construction site Storm Water Pollution Prevention Plan concerns. See Appendix B for the 2015 Citizen Complaint Database. 	Number of complaints received annually. <ul style="list-style-type: none"> One Citizen Complaint was received regarding a residential site. See Appendix C for photos & NOVs. 	Fire Prevention/EPW	X	X	X	X

City of Paducah 2015 Annual Compliance Report

Task	BMP- Activity Description	Objective - 2015 Status Measures of Success - 2015 Numbers Responsible Parties
6	<p>Utilize created Construction Site Database.</p> <ul style="list-style-type: none"> The City of Paducah Engineering and Public Works Department utilizes the Construction Site Database in Excel and the level of activity at the construction sites to prioritize sites for construction site inspections. During regular site inspections, the Storm Water & Drainage Engineer discovered a construction site that had sediment laden storm water runoff leaving site and flowing into a ditch offsite. The site was located outside of the City limits /MS4 boundary, therefore the local KDOW office was contacted and made aware of the situation. Please see Appendix C for the correspondence with the local KDOW office and pictures of the site. <p>Continue to inventory and prioritize sites for inspection.</p>	<p>Excel Spreadsheet that summarizes all site plan reviewed sites.</p> <ul style="list-style-type: none"> See Appendix D for a copy of Excel Spreadsheet that summarizes all site plans reviewed. See the 2015 BMP Status Report. <p>Fire Prevention/ EPW</p>

City of Paducah
2015 Annual Compliance Report

Task	BMP- Activity Description	Objective - 2015 Status	Measures of Success - 2015 Numbers	Responsible Parties	2015	2016	2017	2018	2019	2020
					Env	EPW	EPSC	SWPPP	Permit	Other
1	Sponsor contractor/developer education workshop.	<p>Hold an educational workshop at least once during the 2010-2015 permit cycle.</p> <ul style="list-style-type: none"> An educational conference for Maintenance-Code Enforcement Workshop for Region was held during the 2015 permit year. The regional workshop reviews property maintenance and code enforcement comparisons with standard practices, concerns and issues. The goal of the workshop was to provide an overview of recent changes to the code that reflect the most current industry standards and technology. The workshop was free for all those who wanted to attend and was put on by the City Fire Prevention Department. 	<p>Number of individuals that attended the conference.</p> <ul style="list-style-type: none"> One workshop was held during the 2015 permit year. Approximately 50 people attended the conference. See Appendix A for New Release. 	Fire Prevention/ EPW	X	X				
2	Make EPSC Guidance materials available to local contractors and inspectors.	Distribute number of booklets and supporting materials based on the amount of material requested by the contractor.	Number of booklets and supporting material distributed.	EPW	X	X	X	X	X	

City of Paducah
2015 Annual Compliance Report

Task	BMP- Activity Description	Objective - 2015 Status	Measures of Success - 2015 Numbers	Responsible Parties	YEAR	YEAR	YEAR	YEAR	YEAR
					2015	2014	2013	2012	2011
3	Provide Training for MS4 staff in the fundamentals of erosion prevention and sediment control.	Train appropriate staff as necessary.	Number of training sessions per permit cycle.	<ul style="list-style-type: none"> • The Stormwater and Drainage Engineer attended multiple meetings with the Jackson Purchase Foundation and Four Rivers Basin Team of which dealt with storm water issues. • Multiple meetings were attended by City staff during the 2015 permit year. See Appendix A for information on meetings. 	EPW	X	X	X	X

City of Paducah
2015 Annual Compliance Report

Task	BMP- Activity Description	Objective - 2015 Status	Measures of Success - 2015 Numbers	Responsible Parties			
				EPW	KYG	EPW	KYG
1		<p>Submit water quality treatment standard to KDOW by April 1, 2011 to meet this BMP. Standard shall be based on an analysis of precipitation records to determine the equivalent surface depth of runoff (e.g. 0.75 inches) produced from an 80th percentile precipitation event.</p> <ul style="list-style-type: none"> • A draft water quality treatment standard ordinance was submitted to the Kentucky Division of Water on March 22, 2011. In 2012, the city attorney's office Denton and Keuler, LLP reviewed the draft ordinance submitted to KDOW and made revisions to the originally submitted draft. • Current City Ordinances state, "The use of other methods of controlling peak discharge rates and pollutant removal, such as bio-retention swales, infiltration ditches, hydrodynamic separators, and created wetlands may be required by the city, in its sole discretion, for some large developments. Additionally, the city will promote conservation measures such as buffer strips and greenways as acceptable techniques toward the protection and improvement of local waterways." 	<p>Develop treatment standard per KYG 200000 permit. Current City Ordinances to be as stringent as KYG 100000 permit.</p> <ul style="list-style-type: none"> • The permit requirement states the permittee develop and submit to the Division of Water a water quality treatment standard to be adopted by ordinance or other regulatory mechanism. Timeline for passing ordinance not specified in permit. See Appendix D for Draft Ordinances. 	EPW	X	X	

**City of Paducah
2015 Annual Compliance Report**

Task	BMP- Activity Description	Objective - 2015 Status	Measures of Success - 2015 Numbers	Responsible Parties	EPW 100000 150 32 33 34 35	EW 100000 150 32 33 34 35
2	In areas of development and redevelopment that result in new or expanded discharges to a high-quality water an ordinance shall be passed for standards for runoff control that are considered sufficient to protect existing in-stream water uses and the level of water quality necessary to protect the existing uses.	Ordinance for runoff control standard to High Quality Waters shall be submitted by April 1, 2011 <ul style="list-style-type: none"> As required by the Kentucky Division of Water KYG 200000 permit, the City of Paducah submitted to the Kentucky Division of Water a draft ordinance to be passed. The Division of Water requested a review of this ordinance prior to passing the ordinance. The City attorney Denton and Keuler, LLP reviewed the draft and changes were made to the initial document sent to the Kentucky Division of Water. 	<p>City Ordinances meet the KYR 100000 permit requirements.</p> <ul style="list-style-type: none"> City Ordinances currently allow for the City of Paducah to approve as noted Stormwater Management Plans, Erosion Control Plans, and Site Plans. This allows for the City to require the developer to be in compliance with the KYR 100000 permit and state standards. 	EPW	X X	X X
3	MAY develop alternatives for water-quality treatment standard: off-site mitigation or payment-in-lieu.	May Provide site operators with an alternative to water-quality treatment. <ul style="list-style-type: none"> Currently this is not being developed <ul style="list-style-type: none"> Currently this is not under development but will remain an option. 	<p>City May or May not develop this BMP but is an option per KYG 200000.</p> <ul style="list-style-type: none"> Currently this is not under development but will remain an option. 	EPW	X X	X X

City of Paducah
2015 Annual Compliance Report

Task	BMP- Activity Description	Objective - 2015 Status	Measures of Success - 2015 Numbers	Responsible Parties	YEAR	YEAR	YEAR	YEAR	YEAR	YEAR
					2015	2014	2013	2012	2011	2010
4	Create/Develop a program to notify the BMP owner or operator of deficiencies and ensure completion of required repairs. By City Ordinance, ownership, operation, and maintenance of storm water control facilities for all developments requiring storm water control facilities remain with the property owner/developer.	City to inspect BMPs within MS4 during permit cycle, property owners responsible for maintenance, may develop property owner self-inspection documentation with City oversight. This will be an ongoing BMP.	<p>Currently, property owners are responsible for BMPs on their property. Some items of deficiency are already covered under existing ordinances such as:</p> <ul style="list-style-type: none"> • Unlawful to obstruct natural watercourse. • Unlawful to have weeds higher than 10”. • Unlawful to have accumulations of litter and solid waste on property. <p>A self-inspection program is still currently under development. Post Construction BMPs are inspected at the time of completion of construction. However, the City of Paducah does not currently notify the Post Construction BMP owner that maintenance is needed on a facility BMP unless it is a violation of health and safety, or in violation of current City Ordinances.</p>	<p>Number of BMPs inspected.</p> <ul style="list-style-type: none"> • 4 Post Construction BMPs were inspected during construction and after construction on new construction/ redeveloped sites. <p>Number of enforcement actions taken.</p> <ul style="list-style-type: none"> • One enforcement action was taken for violation with Post Construction BMPs. During the 7/7/15 flood event a property's detention basin failed. See Appendix D for letter and photo. 	X	X	X	X	X	X

City of Paducah
2015 Annual Compliance Report

Task	BMP- Activity Description	Objective - 2015 Status	Measures of Success - 2015 Numbers	Responsible Parties	YEAR	YEAR	YEAR	YEAR
					1	2	3	4
5	Review and evaluate municipal policies related to building codes, or other local regulations, with a goal of identifying regulatory and policy impediments to the installation of green infrastructure, such as green roofs, porous pavements, water harvesting devices, grassed swales instead of curb and gutter, rain barrels and cisterns; downspout disconnection, etc.	City officials will review current ordinances, policies, and building codes by April 1, 2011. • The City performed a review and submitted a typed report regarding the evaluation of "Green Infrastructure" to the Kentucky Division of Water's (KDOW) MS4 Coordinator.	City may or may not develop changes based on this review. A typed statement about investigation will be produced for compliance with this permit requirement.	EPW	X	X	X	X

City of Paducah
2015 Annual Compliance Report

Task	BMP- Activity Description	Objective - 2015 Status	Measures of Success - 2015 Numbers	Responsible Parties	YEAR	YEAR	YEAR	YEAR	YEAR	YEAR
					FY 15	FY 14	FY 13	FY 12	FY 11	FY 10
1	Continue to implement requirements for post construction runoff controls	Require certain sites to implement post construction runoff controls. <ul style="list-style-type: none">Certain sites that fall under the Storm Water Conveyance and Management ordinance requirements are required to have storm water control facilities constructed to reduce the 10-year storm water runoff rate between the pre and post developed conditions. See Appendix D for the 2014 BMP Status Report.29 Private Development Site Plans were submitted in 2015.	Number of site plans with control facilities constructed. <ul style="list-style-type: none">6 site plans were submitted having storm water runoff controls with a total of 10 post construction runoff controls.	Fire Prevention/ EPW	X	X	X	X	X	X
2	Promote water quality based BMPs.	Require certain sites to install water quality based BMPs. <ul style="list-style-type: none">Some commercial sites are required to install water quality based BMPs such as screening devices, hydrodynamic separators, or vegetated swales. These devices are used to help reduce the amount of pollutants that enter the storm sewer system and improve water quality by separating out the solids from the storm water.The City of Paducah required Homewood Suites to install a storm water separation device.	Number of site plans with BMPs installed. <ul style="list-style-type: none">1 site plan was submitted having water quality based BMPs.0 Water quality/quantity BMPs installed in 2015.See Appendix D for the 2015 BMP Status Report.	EPW	X	X	X	X	X	X

City of Paducah
2015 Annual Compliance Report

Task	BMP- Activity Description	Objective - 2015 Status	Measures of Success - 2015 Numbers	Responsible Parties	2015 Measures Status Years				
					Fire Prevention	EPW	MS4	Stormwater	Basin
3	Assure long term operation and maintenance of BMPs.	Make the property owner responsible to maintain BMPs. • By City ordinance, property owners are required to maintain detention basins in a lawn state. Also by city ordinance, property owners are responsible for the ownership and maintenance responsibilities of the storm water control facilities. See Appendix D for the 2015 BMP Status Report.	Number of BMP plans submitted with owner's signature. • 4 site plans were submitted requiring an owner's signature for maintenance of storm water management facilities.	EPW	X	X	X	X	X
4	Establish procedures for inspection of a representative number of installed BMPs	City to inspect BMPs within MS4 during permit cycle, property owners responsible for maintenance, may develop property owner self-inspection documentation with City oversight. This will be an ongoing BMP.	Number of BMPs inspected. • 3 BMPs were inspected at construction sites, these BMPs were inspected during erosion control inspections. • No notices of violations were issued during routine EPSC inspections for failure to maintain detention basins in a lawn state.	Fire Prevention/ EPW	X	X	X	X	X

City of Paducah
2015 Annual Compliance Report

Task	BMP- Activity Description	Objective - 2015 Status	Measures of Success - 2015 Numbers	Responsible Parties						
				EPW	EPW	EPW	EPW	EPW	EPW	EPW
5	Train MS4 staff in the fundamentals of long-term storm water quality treatment management practices and in how to review such practices on construction plans and how to inspect practices for long-term protection, operation, and maintenance.	<p>City staff will be trained on an "as needed" basis. This training may not occur every year. But will occur at least once during the permit cycle.</p> <ul style="list-style-type: none"> The City of Paducah Storm Water and Drainage Engineer was scheduled to attend classes at the KSPE Annual Convention held May July 8th- 10th in Lexington, Kentucky. Unfortunately, the July 7th flash flood event occurred and the Storm water and Drainage Engineer was unable to attend due to the impacts of the flooding event to citizens and community. 		X	X	X	X	X	X	X

City of Paducah
2015 Annual Compliance Report

Task	BMP- Activity Description	Objective - 2015 Status Measures of Success - 2015 Numbers Responsible Parties
1	Require Herbicides and Pesticides application training for municipal employees.	<p>Number of employees trained.</p> <ul style="list-style-type: none"> Employees attended various training sessions throughout the state. 5 employees had Herbicide/ Pesticide licenses during the 2015 permit year. Please see Appendix E for a summary of the training sessions and employees' attendance.

**City of Paducah
2015 Annual Compliance Report**

Task	BMP- Activity Description	Objective - 2015 Status	Measures of Success - 2015 Numbers	Responsible Parties
2	Continue to implement measures to minimize the impact of de-icing program.	<p>Use the salt-brine solution to minimize the concentration of salt dispersed on the road.</p> <ul style="list-style-type: none"> Salt-brine solution was not used during the 2015 permit year. The City also continues to calibrate salt-spreading vehicles annually and provide cover for salt storage. The City calibrates equipment accordingly to the predicted weather event. Due to the amount of freezing rain storms that were predicted, less brine was used than in previous years. Please see the attached Application Tables that the City follows for the predicted weather event in Appendix E. 	<p>Document pollution prevention activities.</p> <ul style="list-style-type: none"> 0 gallons of salt-brine used with 0 tons of salt in the solution. 300 total tons of salt used. 	EPW
3	Conduct regular street sweeping.	<p>Sweep streets as needed annually.</p> <ul style="list-style-type: none"> See Appendix E for a summary of the yearly street sweeping activities. 	<p>Miles of street swept.</p> <p>Estimate of 60% of Total Miles driven.</p> <ul style="list-style-type: none"> 6,627 miles of street swept. <p>Tonnage of debris collected.</p> <ul style="list-style-type: none"> 792 tons of debris collected. 	EPW

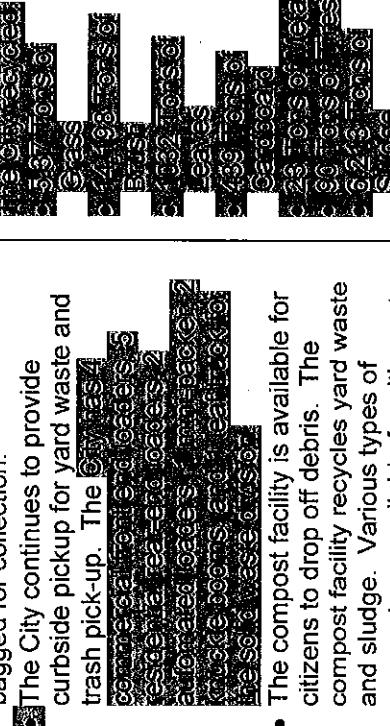
City of Paducah
2015 Annual Compliance Report

Task	BMP- Activity Description	Objective - 2015 Status	Measures of Success - 2015 Numbers	Responsible Parties	YEAR 1	YEAR 2	YEAR 3	YEAR 4	YEAR 5
					EPW	EPW	EPW	EPW	EPW
4	Conduct catch basin, road culvert, and storm sewer cleaning.	Clean catch basins and road culverts as needed annually. • Additionally, there was an estimated 496 linear feet of driveway/yard pipes installed/repaired.	Number of catch basins, road culverts, and storm sewer cleaned. • 1,984 Catch Basins checked and 1,968 cleaned. • 16 Culverts and 341 linear feet of culverts cleaned. • 13,238 linear feet of storm sewer cleaned. Tonnage of debris collected. • 166 total tons of debris collected.	EPW	X	X	X	X	X

City of Paducah 2015 Annual Compliance Report

Task	BMP- Activity Description	Objective - 2015 Status	Measures of Success - 2015 Numbers	Responsible Parties	YEARS					
					2015	2014	2013	2012	2011	2010
5	Implement yard waste collection program.	Continue to offer leaf collection, yard waste collection, and trash pick-up. A compost facility is available for citizens to provide free drop off composting material.	<p>Document types and total weight of materials collected.</p> <ul style="list-style-type: none"> The City sold 140 boxes of leaf bags in 2015. See Appendix E for leaf bag totals. The City continues to provide curbside pickup for yard waste and trash pick-up. The City has 5 commercial front end loaders, 5 residential rear-end loaders, 3 automated loaders, 1 mini-packer, 2 knuckle booms, and 1 leaf truck for the solid waste division. The compost facility is available for citizens to drop off debris. The compost facility recycles yard waste and sludge. Various types of compost are available for citizens to purchase at the compost yard. Residential trash is collected weekly. Commercial trash pick-up varies from daily to weekly. Dumpsters are available for cardboard collection only and cardboard is then recycled at local recycling centers. 	EPW	X	X	X	X	X	X

City of Paducah
2015 Annual Compliance Report

Task	BMP- Activity Description	Objective - 2015 Status	Measures of Success - 2015 Numbers	Responsible Parties	Years				
					Year 1	Year 2	Year 3	Year 4	Year 5
5		<p>Continue to offer leaf collection, yard waste collection, and trash pick-up. A compost facility is available for citizens to provide free drop off composting material.</p> <ul style="list-style-type: none"> • Citizens are required to have leaves bagged for collection. • The City continues to provide curbside pickup for yard waste and trash pick-up. The City has a compost facility located at the trash facility. <p>Implement yard waste collection program.</p>	<p>Document types and total weight of materials collected.</p> 	EPW	X	X	X	X	X

**City of Paducah
2015 Annual Compliance Report**

Task	BMP- Activity Description	Objective - 2015 Status	Measures of Success - 2015 Numbers	Responsible Parties
6	Implement appliance pick-up program.	<p>Continue to offer appliance pick-up.</p> <ul style="list-style-type: none"> • Appliance pick-up is offered to citizens as a request by the property owner. 	Number of appliances collected and total weight of material. <ul style="list-style-type: none"> • The appliance weight collected is now part of the weight that is reported with municipal solid waste. 	EPW
7		<p>Continue to pay waste disposal contractors to collect household wastes.</p> <ul style="list-style-type: none"> • Waste from vehicle maintenance activities are properly disposed of by City staff, or in the case of tires, brake pads, and certain motor fluids generated by vehicle maintenance, an outside contractor has been hired to collect and dispose of wastes generated by vehicle maintenance. • The City has annual contracts with Universal Refining to collect and dispose of oil and antifreeze and with Liberty Tire to dispose of used tires. • The City does a one for one replacement with vendors for batteries and brake pads. • The City charges \$5/tire and higher depending on tire size for tire pick up. 	Documentation of items and quantities collected. <ul style="list-style-type: none"> • The City and McCracken County held a household hazardous waste day on Saturday April 4th 2015. See Appendix E for a listing of materials and quantities disposed of by American Environmental Services, Liberty Tire, and CWI. The e-waste was disposed of thru GES Recycling. 	EPW

City of Paducah
2015 Annual Compliance Report

Task	BMP- Activity Description	Objective - 2015 Status	Measures of Success - 2015 Numbers	Responsible Parties	YEAR	YEAR	YEAR	YEAR	YEAR	YEAR
					1	2	3	4	5	EPW
8		Hold at least 3 meetings over the course of the 5 year permit cycle.	<ul style="list-style-type: none"> • A meeting was held with the Compost Yard Supervisor in regards to monitoring the storm runoff from the compost yard site. The Compost Yard Supervisor regularly checks the storm water runoff pond to ensure overflowing does not occur. The outlet of the pond goes through the Joint Sewer Agency's Wastewater Treatment Plant. During this meeting, both storm water runoff and groundwater monitoring importance was discussed with the employee by the Storm Water Drainage Engineer. The Storm Water and Drainage Engineer also completed a Groundwater Protection Plan in accordance with 401 KAR 5:037 for the Compost Yard Site. See appendix E for a copy of the Groundwater Monitoring Plan. 	Document number of training sessions and number of attendees.			X			EPW

City of Paducah
2015 Annual Compliance Report

Task	BMP- Activity Description	Objective - 2015 Status	Measures of Success - 2015 Numbers	Responsible Parties	YEAR	YEAR	YEAR	YEAR	YEAR	YEAR
					2015	2016	2017	2018	2019	2020
9	Develop an inventory of municipal facilities, maintenance activities and schedules, and ongoing inspection procedures for structural and non-structural BMPs. BMPs that are to be used in this inventory are ones designed to reduce pollutants discharging to separate storm sewers. Procedures will be developed for proper disposal of waste.	Create an inventory as required by permit. This will be ongoing. After inventory is created the items will be placed on a created inspection schedule for inspection of discharge to MS4; if applicable (Facility BMP may discharge in a non-MS4 area).	Activities as a result of this BMP will be documented in each Annual Report with the goal of documenting inventory as required by the end of the permit cycle.	EPW	X	X	X	X	X	X

LOCAL WATER RESOURCES

1. Water Quality Conditions

A. Approved Total Maximum Daily Loads (TMDLs), specific pollutants, and wasteload allocations (WLAs)

Being next to the Ohio River, the City of Paducah has several streams that empty near or outside the city limits. The City of Paducah does not have any approved total maximum daily loads with wasteload allocations according to the Kentucky Division of Water website.

B. Impaired water bodies and specific pollutants with a TMDL actively under development.

The City of Paducah has three 303(d) listed water bodies inside its corporate limits. The water bodies listed are Island Creek, the Middle Fork of Massac Creek, and the Ohio River. See Appendix B for a CD containing an illustration of the 303(d) listed streams. At both, the Middle Fork of Massac Creek and Island Creek locations, the vast majority of the creeks convey surface runoff originating in McCracken County with minimal impacts to these respective streams originating from Paducah's MS4 outfalls. The majority of flow from the Ohio River also originates outside of the City of Paducah. Although only three 303(d) listed water bodies are listed that flow through the City of Paducah, there are many more 303(d) listed streams located outside of the city limits.

The Middle Fork of Massac Creek has 6.4 miles of impairment. The Middle Fork of Massac Creek is listed as partially supporting warm water aquatic habitat from stream mile 0.0 to 6.4. From stream mile 0.0 to approximately 0.9, the Middle Fork of Massac Creek lies within the City of Paducah corporate limits with the remainder in McCracken County. This area of Paducah is also known as Information Age Park. The 0.9 miles of the stream segment in this area is on the discharge end of the creek. Nitrate/Nitrite (Nitrite + Nitrate as N) and sedimentation/siltation are listed as the impairments for this stream segment. The suspected sources for the pollutants are listed as Agriculture, Crop Production (Crop Land or Dry Land). Both of these impairments can be attributed to the farmlands that border the creek. This creek receives negligible storm water runoff contributions from the City of Paducah. The road segments within this watershed have curb and gutter and receive minimal runoff from adjacent properties. The actual runoff from the City roadway system is approximately 6.6 acres or 0.07% of the watershed. 197 acres of the 9125 acre watershed lie within the City of Paducah or 2.2%. However, looking at aerial photography one can determine that the stormwater that flows thru the MS4 system by cross culverts originates from private lands that are either developed or have an agricultural use. These cross culverts in this watershed convey a total of approximately 107 acres or 1.2% of the watershed.

Island Creek has 10.1 total miles of impairment. Stream mile 0.0 to approximately 1.1 of Island Creek lies in the City of Paducah corporate limits. The remainder of the 10.3 miles lies in McCracken County. The 1.1 miles of stream is on the

discharge end of the creek. From stream mile 0.0 to 5.7, Island Creek has a warm water aquatic habitat partially supporting impairment listed as cause unknown and the suspected source or sources as unknown. Under a primary contact recreation classification, the creek has a non-supporting impairment listed as fecal coliform and a suspected source as unknown. However, the Paducah-McCracken County Joint Sewer Agency (JSA) has six combined sewer overflows (CSO) in the Island Creek watershed. Also, Champion Creek discharges into Island Creek in the county. Champion creek does not support warm water aquatic habitat and lists the impairment as unknown with a suspected source of site clearing. The watershed for Champion Creek is not within the boundary of the MS4. From stream mile 5.7 to 10.1, the creek has partially supporting impairment listed as cause unknown and source unknown. See Appendix B for a CD containing JSA's identified CSO discharge points. The impairment of this stream is suspected to have sources such as leaky septic systems, agricultural runoff, underground storage tanks, and combined sewer overflows. This creek receives minimal surface storm water runoff from the City of Paducah. The majority of the storm water runoff comes from outside of the City of Paducah's MS4 jurisdiction. Under the 305(b) Assessment, Island Creek does not support the designated use of primary contact recreation.

The Ohio River has 663.8 miles of impairment listed for Kentucky. This would stretch the entire length of the Ohio River that borders the State of Kentucky. The common pollutants found in every river segment are Dioxin and Polychlorinated Biphenyls. Mercury in Water Column and Escherichia Coli are also found in various segments of the Ohio River. The river segment that has a partial impairment under warm water aquatic habitat is listed from 925.8 to 981 is from Livingston County, McCracken County, Ballard County, and Carlisle County. The pollutants found in this segment are Dioxin, Mercury in Water Column, and Polychlorinated Biphenyls.

Summary of the 2012 303(d) List of Impaired Waters

Status of TMDLs Under Development Prior to 2012				
Stream Name	River Miles	Pollutant	Impaired Use(s)	Suspected Sources
Middle Fork of Massac Creek	0.0 To 6.4	Nitrate/Nitrite, Sedimentation/Silt	WAH	Agriculture, Crop Production
Island Creek	0.0 To 5.7	Unknown	WAH	Unknown
Island Creek	0.0 To 5.7	Fecal Coliform	PCR	Unknown
Island Creek	5.7 To 10.1	Unknown	WAH	Unknown
Ohio River	925.8 to 981	Dioxin, Mercury in Fish Tissue, Polychlorinated Biphenyls in Water Column	FC	Unknown

- C. Impaired waterbodies that do not meet water quality standards and therefore, do not support their designated uses and the specific pollutants identified as causing the impairment.

The City of Paducah has two waterbodies that do not meet water quality standards and do not support their designated uses, a segment of the Tennessee River and an Unnamed Tributary of the Middle Fork of Massac Creek. However, according to the 305(b) Assessment conducted by the Kentucky Division of Water (KDOW), the two stream sections mentioned do not require a TMDL at this time. See in Appendix B McCracken County Stream and Watershed Map for a map of 305(b) listed streams and digital data provided via CD herein.

The Tennessee River from river mile 1.5 to 4.1 receives minimal storm water runoff from the City of Paducah. This section partially borders some of the most eastern portion of the city. The majority of the watershed that affects this portion of the Tennessee River resides in McCracken County and other surrounding counties that discharge into the Tennessee River. The city has approximately 743 acres that discharge into the river. This is a negligible amount in comparison to the watershed which is approximately 40,876 square miles. This stream segment is located at the discharge end of the river. In the 2012 305(b) Assessment, this section of river was evaluated under the primary contact recreation designated use and was listed as a category 5B stream. The pollutant listed in the assessment was fecal coliform and the suspected source is listed as marina/boating pumpout releases. Based on a category 5B listing, the assessed section of the river does not require a TMDL at this time. The categories identified in this background are outlined in the 2012 Integrated Report to Congress on Water Quality more commonly known as the 305(B) report. Under the remaining designated uses, the section of the river was listed as a category 3 stream. When a stream is designated under a category 3 stream, it means that the designated use(s) has/have not been assessed (insufficient or no data available).

An unnamed tributary that flows into the Middle Fork of Massac Creek that has a partially supporting impairment listed from stream mile from 0.0 to 0.7 is in the 305(b) Assessment also flows through some of the outskirts of Information Age Park into Massac Creek. The creek was evaluated under the primary contact recreation designated use and was determined to be listed as a category 5B-PS stream, meaning that the stream does not require a TMDL. The pollutant listed in the assessment was fecal coliform and the suspected source is a package plant or other permitted small flow discharges. Under the remaining designated uses, the stream was listed as a category 3 stream. This stream receives minimal storm water runoff from the City of Paducah's MS4 jurisdiction.

Summary of the 2010 305(b) List of Impaired Waters

Status of Streams Not Requiring a TMDL Prior to 2010				
Stream Name	River Miles	Pollutant	Impaired Use(s)	Suspected Sources
Tennessee River	1.5 To 4.1	Fecal Coliform	PCR	Marina/Boating Pumpout Releases
UT To Middle Fork of Massac Creek	0.0 To 0.7	Fecal Coliform	PCR	Package Plant Or Other Permitted Small Flow Discharges

D. Un-impaired waterbodies that have been assessed as meeting their water quality standards, and therefore, supporting their designated uses.

The City of Paducah has one stream listed as an un-impaired waterbody. Massac Creek was assessed as a warm water aquatic habitat. However, other designated uses have not been evaluated according to the 305(b) Assessment. See in Appendix B for a CD containing McCracken County Stream and Watershed Map for a map of 305(b) listed streams and digital data provided herein.

Massac Creek from stream mile 4.7 to 7.9 is listed in the 305(b) Assessment, which partially flows through the area known as Information Age Park, is listed as fully supporting the designation as warm water aquatic habitat, and the rest of the designated uses are listed under category 3. This stream receives negligible surface storm water runoff from Paducah's MS4 jurisdiction. The majority of the storm water runoff originates from McCracken County.

Summary of the 2012 305(b) List of Un-Impaired Waters

Status of Streams Fully Supporting Designation Prior to 2012				
Stream Name	Stream Miles	Pollutant	Designation Use(s)	Suspected Sources
Massac Creek	4.7 To 7.9	None	WAH/CAH	None

E. Special Use Waters

Four special use water locations are located in the Ohio River in McCracken County. Three locations receive runoff from McCracken County. These locations are designated as special use waters because of the mussels designated under the federally registered endangered species list.

Summary of the 2012 List of Special Use Waters

Status of Streams Not Requiring a TMDL Prior to 2012			
Stream Name	River Miles	Outstanding State Resource Water	Federally Registered Endangered Species
Ohio River	927 To 937	Yes	Potamilus capax (Fat Pocketbook Mussel), Plethobasus cyphyus (Sheepsnose Mussel)
Ohio River	946.2 To 948.2	Yes	Lampsilis abrupta (Pick Mucket Mussel)
Ohio River	937.2 To 939.8	Yes	Plethobasus Cooperianus (Orange Pimpleback Mussel), Lampsilis abrupta (Pink Mucket Mussel)

One special use water location commences from 0.3 miles upstream of the Brookport Bridge, then four miles along the Ohio River upstream of that location. This

location is designated as a special use water due to the mussels designated under the federally registered endangered species list.

Summary of the 2010 List of Special Use Waters

Status of Streams Not Requiring a TMDL Prior to 2010			
Stream Name	River Miles	Outstanding State Resource Water	Federally Registered Endangered Species
Ohio River	933 To 937	Yes	Potamilus Capax (Fat Pocketbook Mussel)

2. Water Quantity Issues

The City of Paducah has several areas of localized flooding. Certain places are designated in the 100-year flood elevation, which are also flood prone areas. These areas of the City experience localized flooding during heavy rainfall events as normally should be expected. The City of Paducah is located on the south shore of the Ohio River Mile Marker 934.5 +/- at the confluence of the Tennessee River. By virtue of Paducah's inland waterways geographic location, the City will experience some periodic flooding effects from these rivers. Normally, these events create some disruption but are routinely combated thru the benefit of Paducah's floodwall.

3. Karst Features, Reservoirs, Wetlands, and Altered Stream Channels

The City of Paducah does not have any known karst features. Wetlands that may be in the City of Paducah are regulated by the United States Army Corps of Engineers. The Kentucky Division of Water regulates all floodplain related developments through the application of its stream construction permit regulations.

4. Drinking Water Intakes, KPDES Permitted Facilities, ETC.

Paducah's proximity to the Ohio River provides easy access to a water supply. Paducah Water, the supplier of water for the City of Paducah, has its drinking water intake in the Ohio River at river mile 935.6. Other KPDES permitted facilities are known to exist in the City of Paducah and McCracken County. Examples of these facilities include wastewater treatment facilities, gas stations, concrete plants, factories, construction sites, certain agricultural facilities, and water withdrawal sites.

5. Status Of Recent, Ongoing, Or Planned Restoration Activities That Are Helping To Protect Or Improve Water Quality.

Recent, ongoing, or planned restoration activities that are helping to protect or improve water quality have been outlined in previous Storm Water Phase II Annual Compliance Reports.

The City of Paducah is utilizing the six minimum control measures (MCM) for the Phase II program, to help protect and improve water quality. The first one is Public Education and Outreach, which is used to help educate the public about storm water

issues. The second is Public Involvement, which is used to help get the public to participate in storm water issues and help gain support of those issues. The third is Illicit Discharge Detection and Elimination (IDDE), which are used to help eliminate wastes and wastewaters from non-storm water sources. The fourth is Construction Site Runoff Control, which is used to minimize the amount of sediment runoff from construction sites. The fifth is Post-Construction Runoff Control, which is used to help decrease the amount of pollutants associated with increased impervious areas. The sixth is Pollution Prevention/Good Housekeeping, which is used to improve or protect receiving water quality by altering municipal or facility operations.

City of Paducah Code of Ordinances states in Chapter 50 -153 "The use of other methods of controlling peak discharge rates and pollutant removal, such as bio-retention swales, infiltration ditches, hydrodynamic separators, and created wetlands may be required by the city, in its sole discretion, for some large developments. Additionally, the city will promote conservation measures such as buffer strips and greenways as acceptable techniques toward the protection and improvement of local waterways."

This section of the ordinance has allowed the City to require developers to install additional treatment techniques on newly developed sites. Examples of this include for 2012 alone; a stormwater vortex separator was installed at 3996 Hinkleville Road at the new Holiday Inn Express, a permanent sediment basin with standpipe installed at 251 Chester Hack Drive for Heflin Paving, a site plan for La Quinta Inn was required to be revised to include a stormwater vortex separator at 3960 Coleman Crossing Circle. The La Quinta Inn had the revised plan approved in 2013 and the storm water separator was installed in 2013. In the permit year of 2015, Homewood Suites was required to put in a water quality vortex unit. The exercise of this section of the ordinance has been outlined in the 2015 and previous annual reports submitted to the Kentucky Division of Water.