CITY OF PADUCAH

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City Engineer & Public Works Director

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March 28, 2016

Ms. Abigail Rains
MS4 Storm Water Coordinator
Kentucky Division of Water
200 Fair Oaks Lane
Frankfort, Kentucky 40601

Re: **KPDES No: KYG 200021-2015 Phase II Storm Water General Permit Annual
      Compliance Reporting
      Paducah, Kentucky**

Dear Ms. Rains,

In accordance with the City of Paducah's Storm Water Phase II Small Municipal Separate Storm Water System (SMS4) General Permit, the City of Paducah is submitting its 2015 Phase II General Permit Annual Compliance Report (Annual Report) to the Kentucky Division of Water (KDOW). The Annual Report documents the City's progress in implementing the six minimum control measures (MCM) as outlined in the 2008 Storm Water Quality Management Report submitted August 5, 2008 which was revised during the middle of the 2010 permit year due to the reissuance of the KPDES KYG200000 General Permit which became effective on April 1, 2010.

On September 22, 2010 the City of Paducah submitted its 2010 SWQMP which outlined the City's Best Management Practices (BMPs) for the next permit cycle intended to meet the requirements for the six Minimum Control Measures (MCMs) as part of the requirements associated with the KYG200021 KPDES permit. The City of Paducah also submitted an addendum to the plan on November 10, 2010. The City of Paducah followed the guidance document as prepared by KDOW for creating the 2008 SWQMP. The City of Paducah incorporated the reissued KPDES KYG20 permit requirements into the 2010 SWQMP. The City of Paducah submitted the Proposed sMS4 Monitoring Plan as required by the general Permit in March 2015 of which outlines the City's proposed monitoring program for illicit discharges. The City of Paducah has made significant progress with the storm water management program during the 2015 permit year. Brief descriptions of major initiatives are listed below:

- **Public Education:**

  The City of Paducah helped sponsor the ORSANCO/Friends of the Ohio River Aquarium during the 2015 Barbeque on the River Festival September 24 - 26. This event is great way to help educate the public on the abundant water resources that we have and helps stress the importance of keeping our waterways safe and clean. Pamphlets regarding storm water pollution and illicit discharge were provided to the public.

- **Public Involvement:**

  The City of Paducah helped sponsor the ORSANCO River Sweep held June 20 by providing free dumpster delivery and dumping fees. City of Paducah Police Department operates a prescription drug drop off box for citizens to dispose of unused medications. The Police Department collected 524 pounds of prescription drugs in 2015 which would eliminate the potential of these drugs entering the sMS4 system.

- **Illicit Discharge:**

  The City continues to update the GIS system. On January 22, 2013 a Memorandum of Agreement with the State of Kentucky was made for aerial photography and GIS data. The GIS consortium paid $178,494.36 to upgrade the city's aerial photography and have LIDAR data available. The aerial photography was updated in the GIS system in 2013. The LIDAR information and associated contours were updated in 2014. The City continues to respond to illicit discharge complaints. One complaint was made and the illicit discharge was eliminated.

- **Construction Site Storm Water Control:**

  The City continued to inspect construction sites for pollution control. The City performed 96 construction site inspections for pollution control. Four notice of violations (NOVs) were issued for deficiencies during the 2015 permit year. Follow up site visits were conducted and the sites were remediated.

- **Post Construction Storm Water Runoff Control**

  The City of Paducah continued to implement the ordinances currently adopted in Chapter 50 Article III of the City of Paducah Code of Ordinances. This ordinance has allowed the city to require storm water treatment devices for newly or redeveloped commercial properties.

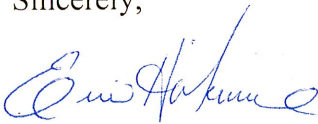- **Good Housekeeping/Pollution Prevention For Municipal Operations:**

  The City of Paducah continues to implement good housekeeping measures on City properties. The City also continues to reduce pollution by performing street sweeping activities and storm sewer cleaning. The City swept 6,627 miles of street. This activity collected 792 tons of debris off the City streets. The City cleaned 341 linear feet of culverts and 13,238 linear feet of storm sewer with associated catch basins which yielded 166 tons of debris.

- **Household Hazardous Waste Day:**

  The City of Paducah partnered with McCracken County to hold an annual household hazardous waste day. The Greater Paducah Sustainability Project, CWI of Paducah, AES Environmental, Inc., Martin Tire, Paducah Power System, and the McCracken County Sheriff's Department also partnered in the event held April 4th 2015. Some of the larger quantities collected during this event include; 1,425 pounds of used oil, 5,065 pounds of flammable liquid, and 3 truck-loads of used tires. See Appendix E of this report to view quantities collected.

The attached Year 5 – 2015 Annual Report accurately reflects the work that was initiated during Permit Year 6 and the progress towards achieving the measurable goals of each Minimum Control Measure. The City of Paducah is dedicated to the successful implementation of the Storm Water Phase II Management Program. Should you have any questions or require additional information please contact me in order that I might provide you with an immediate response to any inquiries you may have. I look forward to our continued progress working with KDOW and your office.

Sincerely,

Eric Hickman, P.E.
Storm Water and Drainage Engineer

RM/nt
C: Jeff Pederson, City Manager, City of Paducah
       Rick Murphy, P.E., City Engineer and Public Works Director, City of Paducah
       John Hodges, P.E., Executive Director, JSA w/enc.
       John Lyons, P.E., Strand Associates w/enc.
       MS4 File