

**STORMWATERMANAGEMENT
PROGRAM FOR
THE CITY OF PARIS
a Phase II Small MS4**

PREPARED FOR:

**Tennessee Department of Environment and
Conservation
Nashville, Tennessee**

November 2017

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SECTION 1 EXECUTIVE SUMMARY

The City of Paris became a small municipal separate storm sewer system (MS4) in 2014. Since that time Paris has been working to meet all of the milestones set forth in our permit. The City of Paris is pleased to provide this Phase II Stormwater Management Plan (SWMP) to the Tennessee Department of Environment and Conservation (TDEC). This program is tailored for The City of Paris, and has been developed to address water quality impairment due to polluted stormwater runoff. Our program includes best management practice, pollution control techniques, system design and engineering methods, and other provisions to control the discharge of pollutants into local waterways.

Permit Requirement	Description	Status
4.2.4a	ordinance for construction site runoff control program	complete
4.2.3	ordinance prohibiting illicit discharges	complete
4.2.4	construction site runoff program	complete
4.2.5	ordinance for permanent BMP	ongoing
4.2.5.6	Inventory and tracking of BMP	ongoing

The Program components include Public Education, Public Involvement, Illicit Discharges Detection and Elimination, Construction Site Runoff Controls, Post- Construction Runoff Controls, and Pollution Prevention/Good Housekeeping for Municipal Operations.

Common Pollutants

- Sediment
- Bacteria
- Oils
- Litter and Debris

Best Management Practices

Education and Public Involvement

- Brochures
- Website
- Advertisements
- Support for Special Events and Programs provided locally
- Storm drain marking
- Community Clean-ups
- Hazardous Waste Collection Days

Illicit Discharge Detection and Pollution Prevention:

- Preventative Maintenance
- Employee Training
- Visual Inspections
- Non-stormwater Detection
- Materials Inventory
- Pollution Prevention
- Recordkeeping
- Complaint Tracking

Proposed Structural BMPs

- Infiltration Basins
- Porous Pavement
- Dust Control
- Reconstructed Wetland
- Bioswales
- Turf Reinforcement Mats
- Rain Gardens
- Bioretention
- Filter Strips

Non-structural BMPs

- No Disturb Buffer Zones along Drainage Ways

What are the best management practices currently employed?

- Community Clean-ups
- Permitting and Planning for Development
- Street Cleaning
- Sediment and Erosion Control Plans Review
- Permanent BMP Plans Review
- Brochures
- Website
- Advertisements
- Storm drain marking

The stormwater contact person is Mr. Mike Brown, Storm Water Coordinator of The City of Paris. Mr. Brown can be contacted by telephone at (731) 641-1409.

SECTION 2 PUBLIC EDUCATION AND OUTREACH ON STORMWATER IMPACTS

The City of Paris will develop and implement a public education program to distribute educational materials to the community or conduct equivalent outreach activities about the impacts of stormwater discharges on water bodies and the steps that the public can take to reduce the pollutants.

The City of Paris will utilize existing materials available through the EPA website, Natural Resources Conservation Service, Tennessee Stormwater Association, United States Geological Survey, University of Tennessee Cooperative Extension Program, etc. **See Attachment A** for examples of education materials available.

As described in our PIE plan, **See Attachment B**, the City of Paris will undertake the following:

- a. General public awareness on the impacts on water quality from general housekeeping maintenance/activities.
 - *The City will distribute educational materials annually at the World's Biggest Fish Fry.*
 - *The City will implement a storm drain marker program.*
 - *The City will participate in the TNSA/TAB radio broadcasts.*
 - *The City will distribute educational materials annually during the TEC TN 250K Tree Giveaway.*
 - *The City will publish BMPs, permitting procedures, stormwater ordinance, design review guidelines, and contact info on the Stormwater Webpage.*
<http://paristn.gov/departments/stormwater-management/>
 - *The City will participate in Preserve Paris Clean Sweep Days.*

- b. Home owner associations and other operators of permanent BMPs awareness of the importance of maintenance activities. *The City does not have any HOA owned BMPs*

- c. Local engineering and development community awareness of the stormwater ordinances, regulations, and guidance materials related to long-term water quality impacts.
 - *The City will distribute educational materials annually at the World's Biggest Fish Fry.*
 - *The City will distribute an annual stormwater update, via email, to educate local engineers and developers on any changes to our stormwater program and ordinances. We will include links to reference materials and training opportunities.*
 - *The City will hold preconstruction conferences, to discuss stormwater management, erosion and sediment control, and review the SWPPP, with the contractors and engineers, prior to beginning work on any project.*
 - *The City will publish BMPs, permitting procedures, stormwater ordinance, design review guidelines, and contact info on the Stormwater Webpage*
<http://paristn.gov/departments/stormwater-management/>

- d. General public and professional chemical applicators awareness on the proper storage, use, and disposal of pesticides, herbicides, and fertilizers use.
- *The City will provide educational pamphlets during hotspot inspections, to any business engaged in the application of these products. This would include lawn and landscape companies, pest control companies, and nurseries.*
 - *The City will address this subject in its educational materials distributed at public events.*
 - *The City will participate in the TNSA/TAB radio broadcasts.*
 - *The City will discuss proper disposal and application of these constituents in the Municipal Employee Training.*
 - *The City will publish BMPs, permitting procedures, stormwater ordinance, design review guidelines, and contact info on the Stormwater Webpage <http://paristn.gov/departments/stormwater-management/>*
- e. General public and professional chemical applicators awareness on the proper storage, use, and disposal of oil and other automotive-related fluids.
- *The City will provide educational pamphlets during hotspot inspections to any business engaged in the application of these products. This would include auto body shops, auto maintenance shops, and tire shops.*
 - *The City will address this subject in its educational materials distributed at public events.*
 - *The City will participate in the TNSA/TAB radio broadcasts.*
 - *The City will discuss proper disposal and application of these constituents in the Municipal Employee Training.*
 - *The City will publish BMPs, permitting procedures, stormwater ordinance, design review guidelines, and contact info on the Stormwater Webpage <http://paristn.gov/departments/stormwater-management/>*
- f. General public and municipal employees on the awareness of identifying and reporting procedures for illicit connections/discharges, sanitary sewer seepage, spills, etc.
- *The City will distribute educational materials annually at the World's Biggest Fish Fry.*
 - *The City will provide pamphlets, detailing illicit discharge detection tips.*
 - *The City will hold training with municipal staff, to educate them on detecting and reporting illicit discharges.*
 - *The City will participate in the TNSA/TAB radio broadcasts.*
 - *The City will publish BMPs, permitting procedures, stormwater ordinance, design review guidelines, and contact info on the Stormwater Webpage <http://paristn.gov/departments/stormwater-management/>*
- g. Local engineering, development, and construction community awareness of stormwater ordinances, regulations and guidance materials related to construction phase water quality impacts.
- *The City will distribute an annual stormwater update, via email, to educate local*

engineers and developers on any changes to our stormwater program and ordinances. We will include links to reference materials and training opportunities.

- *The City will mail hold preconstruction conferences, to discuss stormwater management, erosion and sediment control, and review the SWPPP with the contractors and engineers, prior to beginning work on any project.*
- *The City will publish BMPs, permitting procedures, stormwater ordinance, design review guidelines, and contact info on the Stormwater Webpage <http://paristn.gov/departments/stormwater-management/>*

h. Municipal employee/contractor awareness of water quality impacts from daily operations.

- *The City will hold the necessary training with municipal staff, to educate them on any of their activities that could potentially affect water quality. Training will be specific to each department.*

SECTION 3 PUBLIC INVOLVEMENT/PARTICIPATION

The City of Paris will notify the public of opportunities to provide input to the process of implementing a Storm Water Management Plan by (1) publishing notification of the opportunity to review the Stormwater Annual Report in at least one newspaper of general circulation in the city, and putting the report on public display in City Hall, for public comment.

The City will also publish the phone number and web address, of the stormwater coordinator in all distributed educational materials, encouraging citizens to report illicit discharges or other stormwater concerns. The City will publish a reminder of the stormwater website to utility customers each year, information on the website will define Illicit Discharges, and describing how the public can detect and report Illicit Discharges to the Stormwater Coordinator.

The City's website will provide all relevant ordinances, BMP's, upcoming events, and contact information for the Stormwater Program Coordinator

The City of Paris will utilize existing public involvement programs including Community Clean Up Days, Storm Drain Marking with volunteers, Rain Barrel Raffle at the World's Largest Fish Fry, and supporting the Tennessee Environmental Conference 250K Annual Tree Giveaway Program.

SECTION 4 ILLICIT DISCHARGE DETECTION AND ELIMINATION

The City of Paris will:

- Develop, update and maintain, implement and enforce a program to detect and eliminate illicit discharges.
- Continue to update and maintain our storm sewer system map showing the location

of all outfalls and the names and location of all waters of the United States that receive discharges from those outfalls. Our system map will include: the names and locations of all waters of the state within our city limits; all pipes, inlets, basins, and any other structure within the city of Paris that captures, conveys, or discharges stormwater.

- Effectively prohibit, through ordinance or other regulatory mechanism, non-stormwater discharges into your storm sewer system and implement appropriate Enforcement Response Plan. The ordinance is included in **Appendix 1**. The ERP is included in **Appendix 4**.
- Develop and implement a plan to detect, identify and eliminate non-stormwater discharges including illegal dumping to your system. This plan will be included in **Appendix 4**, and will include procedures to investigate suspected illicit discharges and document the findings.
- Inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste.
- Provide a hotline and website for reporting illicit discharges
- Work with local stakeholders to collaborate on spill response procedures.

SECTION 5 CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

The City of Paris
will:

- Develop, continue to develop, implement and enforce a construction site stormwater runoff program to reduce pollutants in any storm water runoff from construction activities that result in a land disturbance of greater than or equal to one acre. Construction activities disturbing less than one acre will be included in our program if that construction activity is part of a larger common plan or development of a site that would disturb one acre or more.

Currently all construction plans are submitted to the City of Paris, prior to beginning construction. No building permits are issued until the drawings are approved by an engineer consultant hired by the City. During plans review, the stormwater coordinator and engineer consultant review the plans for conformance with all applicable stormwater ordinances. If site is greater than one acre, approval is held until we have received a copy of the approved SWPPP.

- Develop and implement an ordinance or other regulatory mechanism to require erosion and sediment controls, as well as sanctions to ensure compliance, to the extent allowable under state, tribal, or local law. *Attached in Appendix 1.*
- Develop and implement requirements for construction site operators to provide the regulated entity a copy of the Storm Water Pollution Prevention Plan and proof of issuance of applicable TDEC approvals/permits prior to issuance of local approvals/permits. *Engineer Consultant's approval is held until we have received a copy of the approved SWPPP.*
- Develop and implement requirements for construction site operators to implement appropriate erosion prevention and sediment control best management practices, as described in the TDEC EPSC Handbook. *Engineer Consultant's approval is held until the stormwater coordinator has reviewed for conformance. Regular inspection of each active site are held to ensure the measures are being properly maintained. A record of these inspections is kept in a file.*

- Develop and implement procedures for site plan review that incorporates consideration of potential water quality impacts. Procedures will include an evaluation of plan completeness and overall BMP effectiveness. Site Plan Reviewers will maintain certification of at least Tennessee Fundamentals of Erosion Prevention and Sediment Control, Level 2. *Engineer Consultant and Stormwater Coordinator will review each site plan for effectiveness in maintain water quality.*
- Develop and maintain an inventory of all public and private construction sites that contains relevant contact information, the size of the project and area of disturbance, whether the project has a SWPPP, and the date of MS4 approval. *Stormwater Coordinator will maintain a database of all sites active within the year covered in the Annual Report.*
- Develop and implement requirements for construction site operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that may cause adverse impacts to water quality. *These requirements are defined in the ordinance and will be further identified in the IDDE.*
- Develop and implement procedures for site inspection and enforcement of control measures. Inspectors will maintain certification of at least Tennessee Fundamentals of Erosion Prevention and Sediment Control, Level 1. *Stormwater Coordinator and Inspectors will be certified and inspect sites as set forth in the Handbook.*
- Develop and implement procedures for receipt and consideration of information submitted by the public. *The City's call center serves as the tracking system for complaints and reports. A printout can be provided at TDEC's request.*
- *Identification of Priority Construction Activity; preconstruction meetings with construction site operators for priority construction activities; and inspections of sites at least monthly.*

SECTION 6 PERMANENT STORMWATER MANAGEMENT IN NEW DEVELOPMENT AND REDEVELOPMENT

The City of Paris will:

- Develop, implement, and enforce a program to address permanent stormwater runoff from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale, that discharge into your MS4. Our program will ensure that controls are in place that would prevent or minimize water quality impacts. *Permanent Stormwater controls are required per the ordinances, and reviewed by Engineer Consultant when Construction Plans are submitted. Full implementation is on hold until 2019.*
- Develop and implement strategies that include a combination of structural and/or nonstructural BMPs appropriate for your community. *The City of Paris focuses on requiring contractors and developers to maintain as many of the original trees and shrubs as possible on an undeveloped site. We require a buffer to be maintained within 30 feet of the top of bank of a dry weather conveyance, 60 feet if the stream is impaired.*
- Develop and implement a set of requirements to establish, protect, and maintain a permanent water quality buffer along all waters of the state at new development and redevelopment projects. *We require a buffer to be maintained within 30 feet of the top of bank of a dry weather conveyance, 60 feet if the stream is impaired.*
- Use an ordinance or other regulatory mechanism to address permanent runoff from new development and redevelopment projects to the extent allowable under state, tribal, or local law. Ordinance will allow for maximum penalty under as specified in TCA 68-221-1106. *See Ordinances in Appendix 1.*

The City of Paris will enact Design Standards that require:

- Performance Standards
 - a. The MS4 must implement and enforce permanent stormwater controls that are comprised of runoff reduction and pollutant removal. The permittee must require that stormwater discharges from new development and redevelopment sites be managed such that post development hydrology does not exceed the pre-development hydrology at the site, in accordance with the performance standards contained in this section. Runoff reduction is the preferred control practice as it can achieve both volume control and pollutant removal.
 - b. If runoff reduction and/or pollutant removal cannot be fully accomplished on-site per 4.2.5.2.1 and 4.2.5.2.2, then the City may propose off-site mitigation and/or payment into a fund for public stormwater projects. The City will develop and apply criteria for determining the circumstances under which these alternatives will be available. A determination that standards cannot be met on site may not be based solely on the difficulty or cost of implementing measures, but must include multiple criteria that would rule out an adequate combination of infiltration, evapotranspiration and reuse such as: lack of available area to create the necessary infiltrative capacity a site use that is inconsistent with capture and reuse of stormwater;

physical conditions that preclude use of these practices.

- Runoff Reduction (green infrastructure)
 - a. Site design standards for all new and redevelopment require, in combination or alone, management measures that are designed, built and maintained to infiltrate, evapotranspire, harvest and/or use, at a minimum, the first inch of every rainfall event preceded by 72 hours of no measurable precipitation. This first inch of rainfall must be 100% managed with no storm water runoff being discharged to surface waters. For all new and redevelopment on private property, the MS4 may opt to have controls installed on that private property, in the public right-of-way, or a combination of both.
 - b. Limitations to the application of runoff reduction requirements include, but are not limited to:
 - Where a potential for introducing pollutants into the groundwater exists, unless pretreatment is provided;
 - Where pre-existing soil contamination is present in areas subject to contact with infiltrated runoff;
 - Presence of sinkholes or other karst features.
 - c. Pre-development infiltrative capacity of soils at the site must be taken into account in selection of runoff reduction management measures.
 - d. The MS4 may develop a program to allow for incentive standards for redeveloped sites. The MS4 may provide a 10% reduction in the volume of rainfall to be managed for any of the following types of development. Such credits are additive such that a maximum reduction of 50% of the standard in the paragraph above is possible for a project that meets all 5 criteria:
 - Redevelopment;
 - Brownfield redevelopment;
 - High density (>7 units per acre);
 - Vertical Density, (Floor to Area Ratio (FAR) of 2 or >18 units per acre); and
 - Mixed use and Transit Oriented Development (within ½ mile of transit).
- Pollutant Removal

For projects that cannot meet 100% of the runoff reduction requirement unless subject to the incentive standards, the remainder of the stipulated amount of rainfall must be treated prior to discharge with a technology reasonably expected to remove 80% total suspended solids (TSS). The treatment technology must be designed, installed and maintained to continue to meet this performance standard.
- Off-site mitigation

For projects that cannot meet 100% of the runoff reduction requirements, the MS4 may allow runoff reduction measures to be implemented at another location within the same USGS 12-digit hydrologic unit code (HUC) as the original project. Off-site mitigation must be a minimum of 1.5 times the amount of water not managed on site. The off-site mitigation location (or alternative location outside the 12-digit HUC) and runoff reduction measures must be approved by the MS4. The MS4 shall identify priority areas within the watershed in which mitigation projects can be completed. The MS4 must create

an inventory of appropriate mitigation projects, and develop appropriate institutional standards and management systems to value, evaluate and track transactions. Mitigation can be used for retrofit or redevelopment projects, but should be avoided in areas of new development.

- **Payment into Public Stormwater Project Fund**
For projects that cannot meet 100% of the runoff reduction and pollutant removal standards, and cannot provide for off-site mitigation, the MS4 may allow the owner to make payment in a public stormwater project fund established by the MS4. Payment into a public stormwater fund must be at a minimum 1.5 times the estimated cost of on-site runoff reduction controls.
- **BMP Maintenance**
All stormwater BMPs, including BMPs used at mitigation projects, installed and implemented to meet the performance standards of sub-section 4.2.5.2 must be maintained in perpetuity. The City will ensure the long-term maintenance of these stormwater BMPs through a local ordinance or other enforceable policy.

The City will require the owner or operator of any site subject to the performance standards in Paragraph 4.2.5.2 to develop and implement a maintenance agreement (or an equivalent document ensuring compliance with this sub-section) addressing maintenance requirements for any BMPs, including off-site mitigation. The agreement will allow the City of Paris, or its designee, to conduct inspections of the stormwater BMPs and also account for transfer of responsibility in leases and/or deeds. When inadequacies are discovered, the City shall promptly notify the BMP owner or operator of any deficiencies. The BMP owner must initiate corrective action within 30 days of the notice.

The agreement must also allow the City, or its designee, to perform necessary maintenance or corrective actions neglected by the property owner/operator, and bill or recoup costs from the property owner/operator when the owner/operator has not performed the necessary maintenance within 30 days of notification by the MS4 or its designee. The MS4 must conduct subsequent inspection (or obtain sufficient written and photographic evidence) to ensure completion of all required repairs.

Where practices are on public property or within public rights-of way the City will document, e.g., with photos, maintenance logs, contractor invoices, and in the tracking system, that appropriate maintenance and/or repairs have been completed.

The MS4 must require that property owners or operators of any sites subject to the performance standards in Paragraph 4.2.5.2 provide verification of maintenance for the approved stormwater BMPs used to comply with the performance standards. Verification maintenance by BMP owners must be required either by the municipal ordinance regulation and enforcement or contractual agreement (whichever is most appropriate for the jurisdiction) or must include one or more of the following as applicable:

- a. The owner/operator's signed statement accepting responsibility for maintenance with a provision for transferring maintenance responsibility if the property is legally transferred to another party; and/or
 - b. Written conditions in the sales or lease agreement that require the recipient to assume responsibility for maintenance; and/or
 - c. Written project conditions, covenants and restrictions for residential properties assigning maintenance responsibilities to a home owner's association, or other appropriate group, for maintenance of runoff reduction and pollutant reduction stormwater BMPs; and/or
 - d. Any other legally enforceable agreement that assigns permanent responsibility for maintenance of runoff reduction and pollutant reduction stormwater BMPs, including, but not limited to a BMP permit tracking system developed by the MS4 authority.
- **Inventory and Tracking of Management Practices**

The City of Paris will develop a system, designed to track BMPs deployed at new development and redevelopment projects. The City will add these features to our existing GIS database. In addition to the standard information collected for all projects (such as project name, owner, location, start/end date, etc.), the GIS feature shall also include the following information:

 - a. Short description of each stormwater BMPs (type, number, design or performance specifications);
 - b. Latitude and longitude coordinates of controls;
 - c. Maintenance requirements (frequency of required maintenance and inspections) and
 - d. Inspection information (date, findings, follow up activities, prioritization of follow up activities, compliance status).
 - **Owner/Operator Inspections**

In order to ensure that all stormwater BMPs are operating correctly and are properly maintained, the MS4 shall, at a minimum, require owners or operators of stormwater management practices to:

 - a. Perform routine inspections to ensure that the BMPs are properly functioning. These inspections shall be conducted on an annual basis, at a minimum. These inspections shall be conducted by a person familiar with control measures implemented at a site. Owners or operators shall maintain documentation of these inspections.
 - b. Perform comprehensive inspections of all stormwater management facilities and practices. These inspections shall be conducted once every five years, at a minimum. Such inspections must be conducted by either a professional engineer or landscape architect. Complete inspection reports for these five year inspections shall include:
 - Facility type,
 - Inspection date,
 - Latitude and longitude and nearest street address,

- BMP owner information (e.g. name, address, phone number, fax, and email),
- A description of BMP condition including: vegetation and soils; inlet and outlet channels and structures; embankments, slopes, and safety benches; spillways, weirs, and other control structures; and any sediment and debris accumulation,
- Photographic documentation of BMPs, and
- Specific maintenance items or violations that need to be corrected by the BMP owner along with deadlines and reinspection dates. Owners or operators shall maintain documentation of these inspections. The MS4 may require submittal of this documentation.

SECTION 7 POLLUTION PREVENTION & GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

The City of Paris will:

- Develop and implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations. Using training materials that are available from EPA, the state, tribe, or other organizations, our program will include employee training to prevent and reduce stormwater pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and stormwater system maintenance.
 1. Compile a list of municipal operations that are impacted by this operation and maintenance program. See **Appendix 2** for detailed list. List of industrial facilities that the regulated entity owns or operates which are covered by General SW permits or have individual NPDES stormwater permits are included in facility's coverage number and/or permit number.
 2. Training programs utilized for city employees will address illicit discharge detection reporting and review the current municipal stormwater pollution prevention plans in detail. The programs also describe the good housekeeping BMP's compiled from EPA, TDEC and other sources. Training is provided to all new employees and to all current employees annually.
 3. Provide proper education and training to employees, continue to street sweep, inspect inlets and gutters, maintain ditches, inspect outfalls, store potential hazardous materials or pollutants under water resistant shelters in containers that do not leak, keep facilities, grounds, and buildings clean and orderly, properly dispose of wastes, etc.

SECTION 8 IMPAIRED WATERBODIES AND TOTAL MAXIMUM DAILY LOADS

A list of impaired streams segments in The City of Paris is included below in **Attachment C**. Of the causes of impairment listed for the various waterbodies, pollution related to growing areas of development, runoff from residential lawns and golf courses, failing septic systems, and NPDES permitted facilities are viewed as potentially contributing to non-point pollution. The BMPs proposed in this stormwater management program have been strategically selected to provide management of stormwater discharges to those impaired waterbodies within the permittees' areas. BMPs intended to control the discharge of pollutants of concern and ensure that discharges will not cause exceedance of water quality standards have been selected. A discussion of those BMPs is to follow.

The BMPs proposed to meet requirements of the public education and involvement/participation component have been selected to encourage public participation in identifying and eliminating illicit discharges, and erosion of sediments from construction projects. Hotlines to provide the public a means of reporting illicit discharges, and erosion problems will be established. Collection of household hazardous wastes will involve the public in the proper disposal of lawn and garden chemicals, and other household hazardous waste. Educational materials for developers and contractors will be conducted to increase awareness of the impacts caused by loss of vegetation, alteration of hydrology, and increasing impervious area associated with many common development practices. Education efforts will focus on proper selection, implementation, and maintenance of erosion and sediment control measures, and permanent stormwater control measures. Education efforts will also promote alternative methods for construction and permanent stormwater runoff management encouraging low-impact development practices such as vegetative measures, reduced impervious area, reversed elevation for parking lot landscaping, etc.

The BMPs proposed to meet the requirements of the illicit discharge detection and elimination component of the stormwater management program have been selected to develop a comprehensive program for detecting and reporting illicit discharges.

The BMPs proposed to meet the requirements of the construction site and permanent stormwater management components of the storm water management program have been selected to address problems associated with urban non-point source runoff such as increased impervious area and loss of vegetation. Measures such as site plan reviews, establishing non-disturb buffer zone along waterways, and written transfer of maintenance responsibility for permanent stormwater controls will allow the City to guide development and reduce discharge of pollutants and improve water quality. More stringent standards for managing stormwater runoff will be applied to those development projects that have the potential to contribute pollutants of concern to Kentucky Lake or Clifty Creek.

The BMPs proposed to meet the requirements of the good housekeeping/pollution prevention component of the stormwater management program have been selected to address employee training and inspection and maintenance of BMPs. It is important for municipal employees to be well educated on the proper function of the BMPs employed in order to implement a meaningful and effective inspection and maintenance program. is paramount to the effective function of the BMPs. Training will be provided to those municipal employees involved in the use of pesticides and fertilizers, inspection of construction site sediment and erosion control measures, and maintenance of stormwater controls and conveyances.

Stormwater Program Attachments

See Attachment A for examples of education materials available.

See Attachment B City of Paris PIE Plan

See Attachment C City of Paris Water Body Report

Attachment A

Attachment B

Public Information and Education Plan (PIE)																			
Paris, TN																			
MCM: Public Education, Outreach, and Involvement Requirements																			
City-Wide Activities	Distribute educational materials at World's Biggest Fish Fry	Distribute educational materials at Ice Cream Social & Antique Car Show	Marking storm drains	TAB	Stormwater tips on utility bills once a year	Annual press release on proper housekeeping/maintenance	Preserve Paris Clean Sweep Days	Annual mailing to HOA's and other Permanent BMP owners/operators	Email Blast to Engineer/Developers	County Extension Annual Tree Giveaway	Municipal employee training/email	TNSA Northwest TN	Quarterly newspaper ads	Stormwater webpage	Mailing of Herbicide/pesticide/fertilizer pamphlet	Mailing General housekeeping/public pamphlet	Mailing Oil/maintenance pamphlet	Mailing Permanent BMP maintenance pamphlet	Mailing Illicit discharge pamphlet
MS4s shall promote public awareness of the impacts of general housekeeping activities on water quality	X	X	X	X	X	X				X			X	X		X			
MS4s shall promote the importance of maintenance activities by home owner associations and other operators of permanent BMPs.								X					X	X				X	
MS4s shall promote local engineering and development community awareness of the stormwater ordinances, regulations, and guidance materials related to long-term water quality impacts.	X	X		X				X	X					X				X	
MS4s shall promote public and professional chemical applicators awareness on the proper storage, use, and disposal of pesticides, herbicides, and fertilizers.				X							X		X	X	X				
MS4s shall promote public and professional chemical applicators awareness on the proper storage, use, and disposal of oil and other automotive-related fluids.				X							X		X	X			X		
MS4s shall promote public and municipal employees awareness on the procedures for identifying and reporting illicit connections/discharges, sanitary sewer seepage, spills, etc.	X	X	X	X	X			X	X		X		X	X	X	X	X		X
MS4s shall promote local engineering, development, and construction community awareness of stormwater ordinances, regulations and guidance materials related to construction phase water quality impacts.									X					X					
MS4s shall promote municipal employee/contractor awareness of water quality impacts from daily operations.									X		X			X					
MS4s shall provide a public participation program promoting citizen involvement in detection of illicit discharges and monitoring efforts as well as reporting of any illegal disposal of materials into MS4. May include elements such as participation in local stormwater management work groups, public notices of MS4 meetings, recruiting education volunteers, etc.	X	X	X					X		X		X	X		X	X	X	X	X
MS4s shall publicize program participation opportunities by methods designed to reach the intended audience.	X	X								X			X	X					
MS4s shall facilitate opportunities for citizen involvement through activities such as creating a citizens' stormwater advisory council, volunteer stream monitoring programs, storm drain marking, riparian plantings or stream clean-up events.			X				X			X				X					
MS4s shall implement a method of advertising the public involvement opportunities. For example, the MS4 may develop a website that includes information that will inform stakeholders of actions that will result in behavior changes that will improve water quality, provide a press release or advertisement of activities to local cable networks, radio stations, newspapers, or alternate methods that provide an effective equivalent.	X	X	X		X					X	X		X	X					

Attachment C

City of Paris Waterbody Report

TMDL Document Name		HUC	TMDL Date	TMDL Pollutant Description	TMDL Pollutant Source Type	Cause(s) of Impairment Addressed
TMDL for Pathogens in the Tennessee Western Valley (Kentucky Lake) Watershed		6040005	02-05-2005	Pathogens	Point/Nonpoint Source	Unlisted but Impaired
TMDL for E. Coli in the South Fork Obion River Watershed		8010203	02-14-2007	Escherichia Coli (E. Coli)	Point/Nonpoint Source	Unlisted but Impaired; Pathogens

Water body Name	ID	Location		Cause of Impairment	Cause of Impairment Group	State TMDL Development Status
		From	To			
Town Creek	TN06040005024_0110	Bailey Fork Creek	Headwaters	Physical Substrate Habitat Alterations	Habitat Alterations	Needed
Unnamed Trib to Town Creek	TN06040005024_0111	Beginning	Town Creek	Low Flow Alterations	Habitat Alterations	Needed
Clifty Creek	TN06040005023_0500	West Sandy Creek	Headwaters	Phosphorus, Total	Nutrients	Needed
				Sedimentation/Siltation	Sediment	Needed
				Dissolved Oxygen	Organic Enrichment/Oxygen	Needed
Middle Fork Obion River	TN08010203015_3000	Beginning	Thompson Creek	Nitrate/Nitrite	Nutrients	Needed
				Sedimentation/Siltation	Sediment	Needed

STORMWATER PROGRAM APPENDICES

APPENDIX 1
STORMWATER ORDINANCES

APPENDIX 2

MUNICIPAL OPERATIONS THAT AFFECT WATER QUALITY

APPENDIX 3

EXAMPLE BEST MANAGEMENT PRACTICES

APPENDIX 4

**ENFORCEMENT RESPONSE PLAN
ILLCIT DISCHARGE DETECTION AND ELIMINATION PLAN**

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