# Impaired Waters Plan

City of Cumming
November 24, 2015
***REVISED FEBRUARY 2016***

# 1. INTRODUCTION & STUDY OBJECTIVES

The City of Cumming has developed this Impaired Waters Plan (Plan) to evaluate Kelly Mill Branch, Orr Creek, and Sawnee Creek. Kelly Mill Branch, Orr Creek, and Sawnee Creek are listed in the 2014 draft 305(b)/303(d) report as not meeting their respective designated uses due to fecal coliform. This Plan is intended to satisfy requirements of the City's Phase II Stormwater Management Plan to evaluate water quality within impaired waterways within the City.

## Contact

The primary contact with the City who will serve as a liaison with EPD is provided below.

| CONTACT INFORMATION | |
|---|---|
| | |
| Name: | Jonathon W. Heard |
| Title: | Director of Utilities |
| | |
| Mailing Address: | 100 Main Street Cumming, GA. 30040 |
| Phone #: | (770) 781-2020 |
| Fax #: | (770) 781-3482 |
| | |
| Email: | jon.heard@cityofcumming.net |

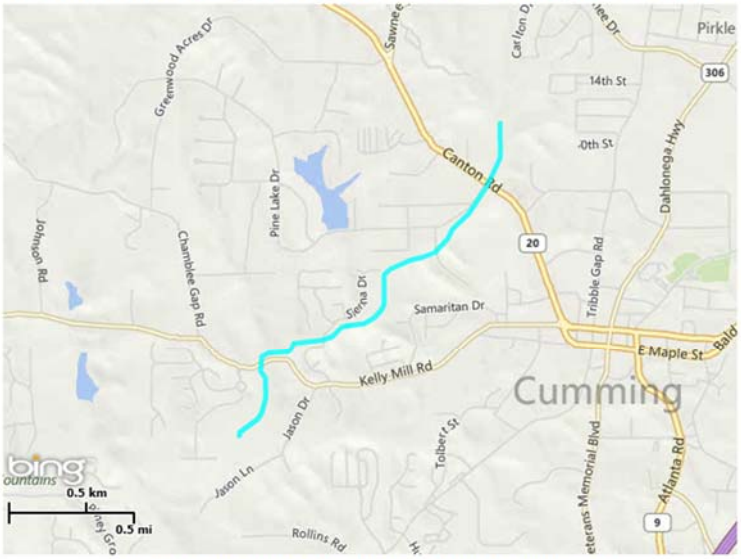
## Stream Impairment

The 2014 draft 305(b)/303(d) list of impaired waterways identifies Kelly Mill Branch, Orr Creek, and Sawnee Creek within the City of Cumming as not supporting their designated uses of fishing. Details of the impairment from the 305(b)/303(d) report are provided below.

| Reach Name | Reach Location | Criterion Violated | Potential Causes | Extent | Notes |
|---|---|---|---|---|---|
| Kelly Mill Branch | Headwaters to Orr Creek - Forsyth County | Fecal Coliform | Urban Runoff | 2 miles | TMDL Completed FC 2003 revised 2008 |
| Orr Creek | Castleberry Rd. (Tyson Foods to Big Crk -Forsyth Co | Fecal Coliform | Urban Runoff | 3 miles | TMDL Completed FC 2003, revised 2008 & Cu 2003 |
| Sawnee Creek | Lake Lanier Tributary - Forsyth County | Fecal Coliform | Non-point Source | 2 miles | TMDL Completed FC 1998 |

**The impaired segment of Kelly Mill Branch in relation to the City of Cumming is shown in the figure below.**

## 2010 Waterbody Report for Kelly Mill Branch




Click on the waterbody for an interactive map

## Water Quality Assessment Status for Reporting Year 2010

### The overall status of this waterbody is Impaired.

Description of this table

| Designated Use | Designated Use Group | Status |
|---|---|---|
| Fishing | Aquatic Life Harvesting | Impaired |

### Causes of Impairment for Reporting Year 2010

Description of this table

| Cause of Impairment | Cause of Impairment Group | Designated Use(s) | State TMDL Development Status |
|---|---|---|---|
| Fecal Coliform | Pathogens | Fishing | TMDL completed |

### Probable Sources Contributing to Impairment for Reporting Year 2010

Description of this table

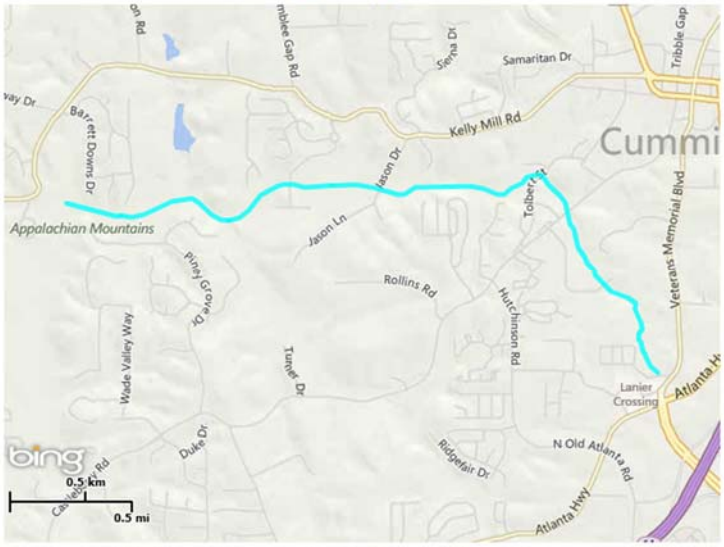
| Probable Source | Probable Source Group | Cause(s) of Impairment |
|---|---|---|
| Unspecified Urban Stormwater | Urban-Related Runoff/Stormwater | Fecal Coliform |

### TMDLs That Apply to this waterbody

*No TMDL data have been recorded by EPA for this waterbody.*

**The impaired segment of Orr Creek in relation to the City of Cumming is shown in the figure below.**

## 2008 Waterbody Report for Orr Creek




Click on the waterbody for an interactive map

## Water Quality Assessment Status for Reporting Year 2008

### The overall status of this waterbody is Impaired.

Description of this table

| Designated Use | Designated Use Group | Status |
|---|---|---|
| Fishing | Aquatic Life Harvesting | Impaired |

### Causes of Impairment for Reporting Year 2008

Description of this table

| Cause of Impairment | Cause of Impairment Group | Designated Use(s) | State TMDL Development Status |
|---|---|---|---|
| Fecal Coliform | Pathogens | Fishing | TMDL completed |

### Probable Sources Contributing to Impairment for Reporting Year 2008

Description of this table

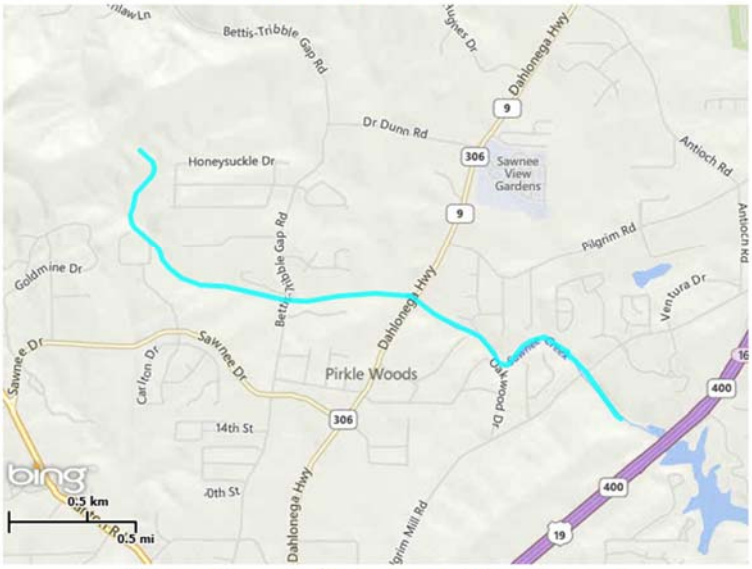
| Probable Source | Probable Source Group | Cause(s) of Impairment |
|---|---|---|
| Unspecified Urban Stormwater | Urban-Related Runoff/Stormwater | Fecal Coliform |

### TMDLs That Apply to this waterbody

*No TMDL data have been recorded by EPA for this waterbody.*

**The impaired segment of Sawnee Creek in relation to the City of Cumming is shown in the figure below.**

## 2012 Waterbody Report for Sawnee Creek




Click on the waterbody for an interactive map

## Water Quality Assessment Status for Reporting Year 2012

Description of this table

| Designated Use | Designated Use Group | Status |
|---|---|---|
| Fishing | Aquatic Life Harvesting | Impaired |

### Causes of Impairment for Reporting Year 2012

Description of this table

| Cause of Impairment | Cause of Impairment Group | Designated Use(s) | State TMDL Development Status |
|---|---|---|---|
| Fecal Coliform | Pathogens | Fishing | TMDL completed |

### Probable Sources Contributing to Impairment for Reporting Year 2012

Description of this table

| Probable Source | Probable Source Group | Cause(s) of Impairment |
|---|---|---|
| Non-Point Source | Unspecified Nonpoint Source | Fecal Coliform |

### TMDLs That Apply to this waterbody

*No TMDL data have been recorded by EPA for this waterbody.*

# 2. BEST MANAGEMENT PRACTICES

The City will continue to implement its Stormwater Management Plan (SWMP) under its current NPDES Phase II MS4 permit. Applicable sections of the SWMP include illicit discharge/ illegal dumping prohibitions via the Cumming Utilities Ordinance.

As part of this plan, the City will implement a number of Best Management Practices (BMPs) in an effort to reduce the occurrences of releases of fecal coliform bacteria from the MS4. These BMPs will include:

- **Drv Weather Screening of Kelly Mill Branch, Orr Creek and Sawnee Creek Watershed MS4 Outfalls –**
  The City is currently required to implement an Illicit Discharge Detection and Elimination (IDDE) plan via their NPDES Phase II MS4 permit. As part of this plan, the City is required to screen 20 percent of their MS4 outfalls each year to determine if non-stormwater discharges are emanating from the system. Procedures for how to screen the system and source trace any discharges are included in the City's SWMP. As part of the Kelly Branch, Orr Creek, and Sawnee Creek impaired waters plan, the City will conduct annual screenings of 20% of the Cumming MS4 outfalls within each watershed each year. Any discharges discovered as part of this procedure will be documented, tested, and source traced to their originating locations to determine if pollutants are being introduced to the stream. If a discharge is found, appropriate actions will be taken which may include education, warnings, and citations as warranted.

- **Pet Waste Stations at City Parks –** the City will install and maintain pet waste stations at the Cumming City Park and at the Cumming Fairgrounds. The pet stations will be installed spring of 2016 and maintained monthly thereafter. Pet waste bags will be replaced as needed (when used). Each fall, approximately 120,000 people visit the Cumming Fairgrounds. Many other events are planned throughout the year at both city facilities.

- **Septic Tank Workshop –** each year, the City hosts a septic tank workshop. The date of the event varies depending upon the schedule of the Forsyth County Health Department staff. The date will be chosen in the first quarter of each year and the City will advertise the workshop in the Forsyth County News and the Cumming Utilities website until the date of the event. Septic tank maintenance will be discussed along with a leaking septic tank's impact on stormwater and receiving streams.

- **Sanitary Sewer Overflow Reporting**
  The City will remain vigilant of any potential or actual sanitary sewer overflows within the City Limits. As part of this implementation plan, the City will take appropriate action to remediate all sewer spills in a timely manner.

The following schedule outlines the implementation plan for the BMPs discussed above:

*Year 1 Activities (2015-2016)*

- Conduct Dry Weather Screening of 20% of the Cumming MS4 outfalls in the Kelly Mill Branch, Orr Creek, and Sawnee Creek watersheds.

*Year 2 Activities & Thereafter (2016-2017)*

- Evaluate the need for additional screening
- Conduct Dry Weather Screening of 20% of the Cumming MS4 outfalls in the Kelly Mill Branch, Orr Creek, and Sawnee Creek watersheds.

# 3. EVALUATION AND REPORTING

**Annual Reporting**

Each year, the City will develop a brief Impaired Waters Report for Kelly Mill Branch, Orr Creek, and Sawnee Creek outlining:

- Documentation of any Activities Undertaken in that Year Pursuant to this Plan.
  - ❖ Pet Waste Station BMP implementation
  - ❖ Pet Waste Education BMP - Brochure Mailer to Stakeholders and Pamphlets at City Hall
  - ❖ Septic Tank Maintenance Workshop BMP
  - ❖ Street Sweeping BMP
- Recommendations of any additional activities such as BMP changes, additions, or deletions based on the evaluation

The results of the various BMPs will be outlined to document the identification of pollution sources along with the mitigation actions taken each year for sources identified in these efforts. If any BMP appears to be ineffective (i.e. no one is utilizing the City's pet waste stations or no one is picking up pet waste brochures), then additional BMPs or BMP modifications will be recommended.

A copy of this report will be included in the City's annual report for its Phase II Stormwater Management Program due February 15th of each year.