



# GEORGIA

DEPARTMENT OF NATURAL RESOURCES

## ENVIRONMENTAL PROTECTION DIVISION

**Richard E. Dunn, Director**

**Watershed Protection Branch**

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Suite 1152, East Tower  
Atlanta, Georgia 30334  
404-463-1511

May 25, 2018

Honorable Linda Blechinger, Mayor  
City of Auburn  
Post Office Drawer 1059  
Auburn, Georgia 30011



RE: Phase II MS4  
NPDES Permit No. GAG610000  
2017 Annual Report

Dear Mayor Blechinger:

In an April 27, 2018 letter, the Environmental Protection Division (EPD) provided comments on the City of Auburn's 2017 Annual Report. We requested that additional information be submitted for our review. We received the City's submittal on May 21, 2018. Based on our review, we have determined the annual report is acceptable. However, there are some issues that must be addressed by the City.

Illicit Discharge minimum control measure BMP #3 addresses the dry weather screening of outfalls. The City provided an inventory of outfalls that also included a column for the date that the outfalls were inspected. The City should have inspected 100% of the outfalls between the 5-year period of 2012-2017. The inventory included in the May 21, 2018 transmittal only listed inspections performed between 2015-2017, so it appears that not all of the outfalls were screened during the 2012-2017 period. The 5-year period continues successively (e.g. 2013-2018, 2014-2019), so the City has an opportunity to attain Permit compliance by increasing the number of outfall inspections during the 2018 reporting period. This will allow the City to comply with the goal of inspecting 100% of the outfalls within 5 years. The City must ensure that steps are taken in 2018 and future years to comply with the measurable goal and that documentation of the activities are included in each annual report.

The City indicated that they are in the process of field verifying the MS4 structures in order to develop an updated inventory and map. The City is proposing to complete the mapping project by 2022. The Storm Water Management Program (SWMP) revision is due on June 4, 2018. The City should ensure that this mapping schedule is incorporated into the relevant Best Management Practices.

During the mapping of the MS4 structures, it is recommended that the City conduct inspections of the structures. The inspections should be documented through the completion of an inspection form or other method. This will allow the City to demonstrate in each annual

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report that they are on schedule for complying with the Permit requirement to inspect 100% of the structures within a 5-year period.

Thank you for your cooperation in this matter. If you have any questions, please contact me at 404/651-8546.

Sincerely,



Lisa A. Perrett  
Environmental Specialist  
Storm Water Unit

cc: Joe Moravec, Stormwater Coordinator