



ANNUAL REPORT

APRIL 1, 2014 – MARCH 31, 2015

Gadsden Alabama Urbanized Area
Phase II Small MS4
NPDES General Permit ALR040009

March 2015

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1. INTRODUCTION

S&ME, Inc. has prepared this Annual Report for the *Gadsden, Alabama Urbanized Area* Phase II Small Municipal Separate Storm Sewer System in accordance with S&ME Proposal No. 44-1400514, dated October 3, 2014 and authorized by Mr. Sherman Guyton, Mayor of the City of Gadsden, on February 4, 2015.

The Annual Report is required by Part V.C.1 of National Pollutant Discharge Elimination System (NPDES) General Permit ALR040009 for discharges from regulated small municipal separate storm sewer systems (MS4), issued to the *Gadsden, Alabama Urbanized Area* by the Alabama Department of Environmental Management (ADEM). The urbanized area consists of the following entities: City of Gadsden, Rainbow City, Reece City, City of Southside, City of Glencoe, City of Hokes Bluff, City of Attalla, and portions of unincorporated Etowah County.

1.1 Urbanized Area Designation

The Storm Water Phase II Final Rule issued by the United States Environmental Protection Agency (USEPA) in 1999 requires nationwide coverage of all operators of small MS4s located within the boundaries of an “urbanized area” as defined by the latest decennial Census. Based on the results of the 2000 census, the Bureau of the Census has designated portions of the entities listed in Section 1 as the *Gadsden, Alabama Urbanized Area*. The urbanized area incorporates approximately 75 square miles. A map outlining the approximate boundary of the *Gadsden, Alabama Urbanized Area* is included in **Appendix A** as Figure 1.

1.2 Gadsden-Etowah MS4 Area

The Gadsden-Etowah MS4 is defined as the portions of the entities’ systems within the urbanized area boundary.

Table 1. Gadsden-Etowah MS4 Entities

PLACE NAME	TOTAL PLACE AREA (SQ MILE)	PLACE AREA WITHIN THE URBANIZED AREA BOUNDARY (SQ MILE)
City of Attalla	6.98	5.59
City of Gadsden	38.29	31.21
City of Glencoe	17.02	3.73
City of Hokes Bluff	12.11	4.08
Lookout Mountain CDP	15.32	0.02
City of Rainbow City	25.60	7.60
Town of Reece City	3.56	0.27
City of Southside	19.15	10.00
Etowah County	548.42	12.33

1.3 Hydrologic Units in the Urbanized Area

Neely Henry Lake (Coosa River) is the primary receiving water for the Gadsden-Etowah MS4.

Table 2. Subwatersheds in the Urbanized Area

SUBWATERSHED	HUC 12 ID	TOTAL AREA (SQ MILES)	TOTAL AREA IN UA (SQ MILES)
Little Wills Creek	03150106-01-06	28.36	2.8
Black Creek	03150106-01-07	63.87	12.7
Horton Creek	03150106-01-08	26.44	15.03
Thorton Lakes - Dry Creek	03150106-02-02	15.27	0.09
Big Cove Creek	03150106-02-03	28.24	3.95
Turkey Town Creek	03150106-02-04	89.67	15.49
Lower Big Canoe Creek	03150106-03-06	52.01	2.16
H. Neely Henry Lake - Coosa River	03150106-03-09	72.53	22.57

1.4 Water Quality Concerns

Section 303(d) of the Clean Water Act (CWA), as amended by the Water Quality Act of 1987, and the USEPA Water Quality Planning and Management Regulations (40CFR130) require states to identify waterbodies not in compliance with the water quality standards applicable to their designated use classifications. Section 303(d) then requires that total maximum daily loads (TMDLs) be determined for all pollutants causing violation of applicable water quality standards in each identified segment.

As mentioned in Section 1.2, Neely Henry Lake is the primary receiving water for the Gadsden-Etowah MS4. In 1996, the ADEM identified five of the six reservoirs on the Coosa River within the State of Alabama’s borders as being impaired, including Neely Henry Lake. The following table summarizes the impaired segments of Neely Henry Lake.

Table 3. Impaired Waterbody Segments in the Urbanized Area

ASSESSMENT UNIT ID	WATERBODY NAME	USES	CAUSES	SOURCES
AL03150106-0309-101	Coosa River (Neely Henry Lake)	Swimming Fish & Wildlife	Nutrients pH Organic Enrichment (CBOD, NBOD)	Industrial Municipal Flow regulation/modification Upstream sources
AL03150106-0309-102	Coosa River (Neely Henry Lake)	Fish & Wildlife	Nutrients pH Organic Enrichment (CBOD, NBOD)	Industrial Municipal Flow regulation/modification Upstream sources

Table 3. Impaired Waterbody Segments in the Urbanized Area

ASSESSMENT UNIT ID	WATERBODY NAME	USES	CAUSES	SOURCES
AL03150106-0104-101	Coosa River (Neely Henry Lake)	Fish & Wildlife	Nutrients pH Organic Enrichment (CBOD, NBOD) Priority Organics (PCBs)	Industrial Municipal Flow regulation/modification Upstream sources Contaminated sediments
AL03150106-0104-102	Coosa River (Neely Henry Lake)	Public Water Supply Fish & Wildlife	Nutrients pH Organic Enrichment (CBOD, NBOD) Priority Organics (PCBs)	Industrial Municipal Flow regulation/modification Upstream sources Contaminated sediments

In 2008, the USEPA approved TMDLs for Neely Henry Lake related to Nutrients (Total Phosphorous), pH, and Dissolved Oxygen. The Gadsden-Etowah MS4 is required to achieve a **30% reduction in Total Phosphorus discharge loading.**

1.5 Storm Water Management Program

Part III.B of the NPDES General Permit requires that the Permittee develop and implement a Storm Water Management Program (SWMP) that includes the following six minimum control measures:

1. Public Education and Outreach on Storm Water Impacts
2. Public Involvement/Participation
3. Illicit Discharge Detection and Elimination (IDDE)
4. Construction Site Storm Water Runoff Control
5. Post-Construction Storm Water Management in New Development and Redevelopment
6. Pollution Prevention/Good Housekeeping for Municipal Operations

In February of 2012, S&ME was retained by the Gadsden-Etowah Storm Water Steering Committee to revise and update the SWMP for the Gadsden-Etowah MS4. The updated SWMP was submitted to the ADEM on June 29, 2012. The ADEM approved the submitted SWMP in July of 2012.

1.6 Annual Review and Updates to the SWMP

The Storm Water Management Plan will be reviewed annually by the Storm Water Steering Committee in preparation for the Annual Report required by Part V.C.1 of the NPDES General Permit.

The SWMP may be updated following the procedures laid out in Part IV.B.2 of the NPDES General Permit. Changes to the SWMP adding components, controls, or requirements may be made at any time, provided the ADEM is notified in writing. The changes must also be documented in the Annual Report.

Permission to make changes to the SWMP to remove or replace components, controls, or requirements must be requested from the ADEM a minimum of 60 days prior to making the change. If the request is denied, the ADEM will provide a written response giving the reason for the decision.

1.7 Annual Report Components

Part V.C.1 of the NPDES General Permit requires that the Gadsden-Etowah MS4 prepare and submit annual reports to the ADEM each year by March 31. The Annual Report must cover the year prior to the submittal date (April 1 through March 31) and is required to include the following:

1. The status of the Permittee's compliance with permit conditions
2. An assessment of the appropriateness of the BMPs identified in the SWMP
3. Progress towards achieving the goal of reducing pollutants to the maximum extent practicable (MEP)
4. Measurable goals for each of the minimum control measures.
5. Results of information collected and analyzed during the reporting period
6. A summary of storm water activities the Permittee plans to undertake during the next reporting cycle
7. A implementation schedule for the planned storm water activities
8. Proposed changes to the SWMP
9. Notice of reliance on another government entity to satisfy permit obligations
10. All monitoring results collected during the reporting period

1.8 Coordination Between Entities

Each of the eight entities provides at least one member to the Gadsden-Etowah Storm Water Steering Committee.

Coordination between departments and individuals internal to each of the seven entities is established in each section of the SWMP specific to the individual entities.

1.9 Responsible Party

The Storm Water Steering Committee is responsible for the coordination and implementation of the Storm Water Management Plan. Current membership of the Storm Water Steering Committee is as follows:

Table 4. MS4 Storm Water Steering Committee – March 2014

ENTITY	CONTACT	PHONE NO.	EMAIL
City of Gadsden	Jeremy Ward	256-549-4527	jward@cityofgadsden.com
City of Gadsden	Chad Hare	256-549-4520	chare@cityofgadsden.com
City of Attalla	Jason Nicholson	256-441-9200	j.nicholson@attallacity.com
City of Rainbow City	Heath Williamson	256-413-1240	heathw@rbcAlabama.com
City of Southside	Jimmy Whittemore	256-442-9775 Ext. 103	jwhittemore@cityofsouthside.com
City of Glencoe	Charles Gilchrist	256-492-1424	
City of Glencoe	Rodney Wall	256-492-1424	rodneywall@cityofglencoe.net
City of Hokes Bluff	Lisa Johnson	256-492-2414	hbcity@cityofhokesbluff.net
Etowah County	Tim Graves	256-549-5358	tgraves@etowahcounty.org
Etowah County	Robert Nail	256-549-5358	Rnail@etowahcounty.org

2. MONITORING

2.1 Rationale Statement

As discussed in Section 1.3, the Gadsden-Etowah MS4 currently discharges to an impaired waterbody. Part IV.D.1(c) of the NPDES General Permit requires that the SWMP include a monitoring plan to assess the effectiveness of the BMPs in achieving the wasteload allocations.

The intent of the monitoring program is to assist in evaluating whether or not receiving waters are sustaining water quality in accordance with the established TMDL. Where deviations are documented and/or expected, the collected monitoring data will be used to evaluate the possible extent and cause of the pollutant of concern.

2.2 Monitoring Parameters

The Gadsden-Etowah MS4 is required to achieve a **30% reduction in Total Phosphorus discharge loading**. The largest loading of phosphorous to the Coosa River from the Gadsden-Etowah MS4 is likely to occur during runoff events; therefore, monitoring is conducted within 72 hours of a qualifying rain event of 0.75 inch. To demonstrate the MS4's compliance with the established waste load allocation, the MS4 conducts quarterly monitoring throughout the *Gadsden, Alabama Urbanized Area* for the following parameters:

- Total Suspended Solids (TSS)
- Total Phosphorous
- Orthophosphate
- Nitrate-Nitrite
- Total Kjeldahl Nitrogen (TKN)
- Turbidity
- pH
- Dissolved Oxygen (DO)
- Temperature

2.3 Monitoring Locations

The entities comprising the *Gadsden, Alabama Urbanized Area* have collectively chosen to focus water quality monitoring efforts on the Coosa River. A series of primary monitoring locations were identified along the river at points determined to be representative of the typical land uses in the subwatersheds.

The primary monitoring locations selected for determining compliance of the Gadsden-Etowah MS4 with the 2008 phosphorous TMDL are identified on Figure 2 in **Appendix A**. Coordinates for each point are listed in Table 5. Secondary monitoring locations have also been selected in

the event monitoring of the primary points indicates a need for further assessment of a tributary to the Coosa River.

Table 5. Monitoring Point Coordinates

OUTFALL ID	LATITUDE	LONGITUDE	WATERBODY EVALUATED
AT 5	34.006446°	-86.069061°	Big Wills Creek / Little Wills Creek
GD 8	33.999535°	-86.024463°	Black Creek
RC 2	33.967683°	-86.039476°	Horton Creek
SS 13	33.891352°	-86.049229°	U.T. to Neely Henry Lake
SS 14	33.885921°	-86.030683°	U.T. to Neely Henry Lake
GD 12	33.952567°	-86.003495°	U.T. to Neely Henry Lake
CO 14	33.940904°	-85.967704°	U.T. to Neely Henry Lake
SME 2	34.002461°	-86.001571°	U.T. to Coosa River
GD 6	34.015350°	-85.995617°	Town Creek
CO 15	33.972280°	-85.965354°	U.T. to Neely Henry Lake
RC 14	33.905786°	-86.111656°	Rook Creek / Dry Creek
SS 5	33.941329°	-86.021569°	U.T. to Coosa River
SME 1	33.990184°	-86.004048°	Big Wills Creek / Black Creek
GD 9	33.989718°	-85.998472°	U.T. to Coosa River (East Gadsden)
GD 7	34.008361°	-85.999777°	Storm sewer outfall to Coosa River
GD 5	34.014324°	-85.924013°	Big Cove Creek / Little Cove Creek
GD 3	34.012380°	-85.953651°	U.T. to Neely Henry Lake
SME 3	34.009698°	-85.956230°	Coal Creek
HB 3	34.002129°	-85.882808°	U.T. to Neely Henry Lake

2.4 Monitoring Events

In January 2013, S&ME, Inc. was retained by the Gadsden-Etowah Storm Water Steering Committee to collect the required quarterly water samples for 2013 and provide analyses of the sampling events. In January 2014, S&ME was retained to conduct the required monitoring and reporting for 2014 and 2015.

Table 6. Monitoring Events

MONITORING EVENT	DATE(S) MONITORING CONDUCTED
2013 Q1	March 12-13, 2013
2013 Q2	May 8 and 20, 2013

Table 6. Monitoring Events

MONITORING EVENT	DATE(S) MONITORING CONDUCTED
2013 Q3	September 23, 2013
2013 Q4	December 10, 2013
2014 Q1	February 6, 2014
2014 Q2	June 26, 2014
2014 Q3	September 30, 2014
2014 Q4	November 19, 2014
2015 Q1	March 23, 2015

A monitoring report was issued to the members of the Steering Committee following each monitoring event with exception of first quarter of 2015. The lab results for the monitoring event conducted on March 23, 2015 were not received prior to the issuance of this report. Field sheets have been included for this monitoring event in place of the report. The report will be included in the annual report for the 2015-2016 reporting period. Copies of the reports and/or field sheets for the monitoring events conducted during the April 1, 2014 to March 31, 2015 reporting period are provided in **Appendix B**.

2.5 Analysis of Monitoring Results

Direct comparison of monitoring results can be misleading, as each rain event that was sampled varied in intensity and duration. Seasonal variation is also expected, due to fertilizer application schedules and natural algae growth cycles.

At this time, there is not sufficient data to determine the amount of reduction in Total Phosphorous from the MS4 or to analyze seasonal trends in the sampled waterways. Charts 1 through 9 in **Appendix A** summarize the analytical data collected since the Monitoring Program was first implemented in March of 2013.

2.5.1 Monitoring Point AT5

Monitoring point AT5 evaluates flow in Big Wills Creek approximately 0.27 mile downstream of its confluence with Little Wills Creek. Big Wills Creek flows from the City of Valley Head, Alabama to Gadsden, Alabama, passing through the City of Fort Payne. Big Wills Creek totals approximately 87 miles in length, with a watershed of over 365 square miles. Approximately seven square miles of the Gadsden-Etowah MS4 contribute to Big Wills Creek upstream of monitoring point AT5.

Elevated levels of orthophosphate, total phosphorous, nitrate-nitrite, total Kjeldahl nitrogen, and total suspended solids have consistently been observed at monitoring point AT5. As shown in Charts 1 through 9, analytical values for AT5 are regularly the maximum value as compared to the other points observed during the monitoring events.

A basic statistical summary of the analytical results for all samples collected at monitoring point AT5 is provided below in Table 7.

Table 7. Basic Statistical Summary of Water Data for AT5

PARAMETER	MINIMUM	MAXIMUM	MEDIAN	AVERAGE	SD
Turbidity (NTU)	14.9	70.4	25.3	35.5	20.9
pH (su)	4.06	8.69	5.78	6.18	1.47
Dissolved Oxygen (mg/L)	2.59	15.29	9.39	8.68	3.72
Temperature (°C)	6.91	23.89	14.50	14.66	6.27
Nitrate-Nitrite (mg/;)	0.3	1.3	0.8	0.9	0.3
Orthophosphate (mg/L)	0.10	0.49	0.32	0.29	0.14
Total Phosphorous (mg/L)	0.11	0.54	0.31	0.29	0.14
Total Kjeldahl Nitrogen (mg/L)	0.35	0.97	0.38	0.50	0.22
Total Suspended Solids (mg/L)	14	64	21	27	15

As previously discussed, the Gadsden-Etowah MS4 encompasses approximately 1.9% of the Big Wills Creek watershed; therefore, there is potential for the elevated levels to be a result of upstream activities outside of the MS4 area. The Gadsden-Etowah MS4 will continue to monitor point AT5 during the April 1, 2015 to March 31, 2016 reporting period. If elevated levels of phosphorous and nitrogen continue to be observed, the Gadsden-Etowah MS4 may consider the addition of upstream monitoring points to verify whether or not the source is external to the MS4 area.

2.5.2 Monitoring Point SME1

Monitoring point SME1 was sited to observe water quality at the location where the combined flow from Big Wills Creek, Black Creek, and Horton Creek enters the Coosa River, approximately 6.6 miles downstream from AT5. Monitoring point GD8 is located in Black Creek and monitoring point RC2 is located in Horton Creek. The monitoring locations are identified on Figure 2 in **Appendix A**.

The analytical results for phosphorous and nitrogen at SME1 have consistently been lower than those recorded at AT5, indicating that dilution is occurring before the combined flow from AT5, GD8, and RC2 discharges to the Coosa River.

3. REPORTING AND RECORD-KEEPING

Part V.A of NPDES General Permit ALR040009 issued to the *Gadsden, Alabama Urbanized Area* outlines the monitoring, recordkeeping, and reporting requirements.

3.1 Annual Reports

This Annual Report covers April 1, 2014 through March 31, 2015 and includes:

1. The status of compliance with permit conditions
2. An assessment of whether or not the existing BMPs are appropriate
3. Progress toward reducing the discharge of pollutants to the maximum extent practicable
4. Measurable goals for each of the six minimum control measures
5. Monitoring data
6. Summary and implementation schedule of storm water activities planned for the upcoming year
7. Proposed changes to the SWMP, including changes to BMPs or measurable goals

3.2 Recordkeeping

The following records must be maintained by each entity and will be made available for examination. Records will be retained for a **minimum period of at least three (3) years** from the data of the sample, measurement, report, or application or for the term of the NPDES General Permit, whichever is longer.

The following is a list of records to be retained:

- Copies of all reports required by the permit
- Copies of monitoring reports
- Copy of the NPDES General Permit
- Copy of the Notice of Intent
- Employee training records

4. CITY OF GADSDEN

The City of Gadsden encompasses 41.7% of the Urbanized Area and accounts for 56.2% of the population.

In accordance with Part III.B of the NPDES General Permit, the 2012 Storm Water Management Program detailed the specific activities the City of Gadsden planned to undertake regarding the following six minimum control measures:

1. Public Education and Outreach on Storm Water Impacts
2. Public Involvement/Participation
3. Illicit Discharge Detection and Elimination (IDDE)
4. Construction Site Storm Water Runoff Control
5. Post-Construction Storm Water Management in New Development and Redevelopment
6. Pollution Prevention/Good Housekeeping for Municipal Operations

The Annual Report for the April 1, 2012 to March 31, 2013 reporting period expanded on the planned activities for each control measure beyond the 2012 SWMP.

The following sections detail the current implementation status of each minimum control measure, activities conducted during the current reporting period, planned activities for the upcoming reporting period, requested changes to the provisions of the 2012 SWMP, and the party responsible for implementing each minimum control measure.

4.1 Public Education and Outreach

4.1.1 2014 to 2015 Implementation Status

During the April 1, 2014 to March 31, 2015 reporting period, the City of Gadsden completed eight (8) of the nine (9) Public Education and Outreach strategies identified in the previous Annual Report and continued work on the remaining one (1) strategy.

Topic-specific public announcement on illicit discharges is ready for filming (Activity 3); however, due to internal personnel issues (unexpected death of the media director's wife) and inclement weather, filming did not take place during the reporting period.

The City of Gadsden also completed eight (8) strategy beyond those proposed in the previous Annual Report. These strategies were:

- The City of Gadsden maintained EPA posters on storm water and the Construction Industry outside the Building Department window (Activity 7a)
- The City of Gadsden maintained EPA bookmarks in the library (Activity 10)
- The City of Gadsden placed and maintained “No Dumping” or “No Littering” signs in problem areas (Activity 11)

- The City of Gadsden has maintained the Black Creek Trail along the creek (Activity 12)
- The City of Gadsden has promoted and participated in 3 community cleanups (in addition to Renew Our Rivers) on 10/21/14, 11/7/14, and 11/13/14 along Black Creek (Activity 13)
- The City of Gadsden supports the Gadsden Beautification Board (Activity 14)
- The City of Gadsden has a Facebook page where events and council meetings are advertised on the page as well as photos from events promoted by the City (Activity 15)

A table identifying each Public Education and Outreach strategy planned for the 2014-2015 reporting period, a description of actions taken by the City of Gadsden, and a brief description of activities planned for the next reporting period is provided in **Appendix C**. Supporting documentation is also included in **Appendix C**.

4.1.2 Proposed Activities for the April 1, 2015 to March 31, 2016 Reporting Period

The City will implement the following activities as part of their Public Education and Outreach Program during the 2015-2016 reporting period. To evaluate the success of the program and aid in preparing the required Annual Report, evaluation criteria have been established for each strategy.

Activity 1. Distribute Storm Water Educational Material

The City will develop and distribute storm water education material to approximately 16,000 households and businesses through inclusion in the Gadsden Water Works Annual Water Quality Report or through a separate mail-out. The educational material will:

- Introduce the MS4 to the general public and discuss the storm water cycle and how common contaminants enter the storm water system.
- Educate households and businesses about proper and improper use, storage, and disposal of common household chemicals such as herbicides, pesticides, and fertilizers.
- Provide information on storm water contacts within the City of Gadsden and information on reporting potential storm water violations.

Evaluation Criteria: The City will report the number of households who receive the mail-out during the reporting period. This information will indicate the number of people who received educational materials.

Activity 2. Maintain the Storm Water Web Page

The City will regularly update the Storm Water webpage on the City of Gadsden website that was developed during the 2013-2014 reporting period. The webpage will:

- Include general information on the Gadsden-Etowah MS4;
- Discuss the storm water cycle and how common contaminants enter the storm water system;
- Provide educational materials about proper and improper use, storage, and disposal of common household chemicals;
- Provide links to related storm water resources;
- Provide contact information for reporting illicit discharges; and,
- Provide a calendar of upcoming community events related to storm water outreach.

Evaluation Criteria: The City will report what information was added to the webpage and the number of “hits” on the webpage. The City has an additional target of **500 contacts** for the reporting period. This information will indicate the number of people who view the webpage and the associated educational materials.

Activity 3. Public Service Announcement

The City will complete development of a series of public service announcements and air them on the Gadsden Informational Television Network (GITN). Initially, these announcements will be relatively short (five to ten minutes), based on available programming time. The announcements will be used primarily to provide contact information for reporting illicit discharges and provide a calendar of upcoming community events related to storm water outreach. As the program matures, more extensive programming may be developed to include educational public service announcements.

The City will continue to air council meetings, which include discussion of upcoming events and MS4 topics.

Evaluation Criteria: The City will report the topics and dates announcements were aired during the reporting period. As the program develops, the City will consider providing a survey among the employees and/or residents to determine if the announcement are being heard and are effective.

Activity 4. Partnerships in Educational and Public Involvement Events

The City will partner with Coosa Basin Clean Water Partnership, USDA, Keep Etowah Beautiful, the Middle Coosa Watershed Project, and/or Alabama Power to distribute storm water educational material and promote events such as *Renew Our Rivers*, *Message in a Bottle*, *Farm City*, and/or community cleanup days. Promotion methods may include co-sponsoring radio, television, and/or print advertisement with co-permittees and other stakeholders. City personnel will

participate in the events.

Evaluation Criteria: The City will report number of participants who received educational materials during the events and the ways in which the City promoted and/or advertised the events. This information will indicate the number of people who received educational materials and will help measure the public awareness of the events and degree of public participation.

Activity 5. Promote Water Quality Awareness Week

The City will promote the 2015 *Water Quality Awareness Week* through City resources including co-sponsoring radio, television, and print advertisement with co-permittees and other stakeholders.

Evaluation Criteria: The City will report activities associated with this event and the ways in which the City promoted *Water Quality Awareness Week*. This information will help measure the public awareness of the event and degree of public and City participation.

Activity 6. Promote and Participate in the Etowah County Water Festival

The City will promote and participate in the annual *Etowah County Water Festival* through City resources. Promotion methods may include co-sponsoring radio, television, and/or print advertisement with co-permittees and other stakeholders. City personnel will participate in the festival.

Evaluation Criteria: The City will report number of City volunteers at the event and the ways in which the City promoted / advertised the event. This information will indicate the City's participation and will help measure the public awareness of the event and degree of public and City participation.

Activity 7. Provide Information on Construction Site Storm Water Impacts

In September 2013, the City created an all-inclusive educational pamphlet for small residential construction to large commercial developments on how construction site runoff can impact storm water quality. The City will provide the pamphlet (or other educational material discussing construction storm water impacts) to individuals requesting plan review and building/development permits.

Evaluation Criteria: The City will report the number of permits issued during the reporting period. This information will indicate the number of people who received educational materials.

Activity 8. Provide Information on Low Impact / Green Development

The City will provide pre-printed educational information on green development to individuals requesting plan review and building/development permits. Information may include references to additional resources such as the Green Building Alliance, Low Impact Development Center, and U.S. Department of Housing and Urban Development.

The City will encourage developers and engineers to consider green infrastructure alternatives during the plan review process.

Evaluation Criteria: The City will report the number of permits issued and number of projects that incorporate these techniques during the reporting period. This information will indicate the number of people who received educational materials.

Activity 9. Gadsden-Etowah MS4 Steering Committee Meetings

The City will coordinate and/or participate in quarterly meetings of the Stormwater Steering Committee for entity updates, networking, and coordination of activities and BMP strategies.

Evaluation Criteria: The City will provide meeting agendas during the reporting period. The City will keep attendance records. This information will indicate the participation of the steering committee and their interest in networking and coordination of activities.

4.1.3 Changes

The City of Gadsden requests no changes to the Public Education and Outreach strategies identified in the 2012 SWMP.

4.1.4 Responsible Party

The City of Gadsden Engineering Department is responsible for overseeing, developing, and coordinating the Public Education and Outreach efforts.

4.2 Public Involvement and Participation

4.2.1 2014 to 2015 Implementation Status

During the April 1, 2014 to March 31, 2015 reporting period, the City of Gadsden completed six (6) of the eight (8) Public Involvement and Participation strategies identified in the previous Annual Report and continued work on the remaining two (2) strategies.

The City of Gadsden along with the Gadsden-Etowah Steering Committee scheduled a Second Annual MS4 Conference again February 25, 2015; however due to inclement weather forecast

the conference was postponed two days before the conference. The County received 8 inches of snow that day. The Conference has been rescheduled for April 15, 2015 (Activity 1).

The City of Gadsden has been unable to find an organization to partner with to continue the implementation of a storm drain marking program (Activity 2).

The City of Gadsden also completed six (6) strategies beyond those proposed in the previous Annual Report. These strategies included:

- The City of Gadsden maintains a drop-off recycling center (Activity 9)
- Mr. Chad Hare and Mr. Jeremy Ward attended the ADEM “Nonpoint Source Conference” (Activity 10)
- Mr. Jeremy Ward attended the Coosa River Basin Steering Committee and the Middle Coosa River Basin Steering Committee Meeting (Activity 11)
- Mr. Jeremy Ward spoke to the Coosa River Basin Steering Committee and the Middle Coosa River Basin Steering Committee Meeting (Activity 12)
- The City of Gadsden supports the Gadsden Beautification Board (Activity 13)
- The City of Gadsden provided in-kind services for the Habitat Dragon Boat Festival (Activity 14)

A table identifying each Public Involvement and Participation strategy planned for the 2014-2015 reporting period, a description of actions taken by the City of Gadsden, and a description of activities planned for the next reporting period is provided in **Appendix C**. Supporting documentation is also included in **Appendix C**.

4.2.2 Proposed Activities for the April 1, 2015 to March 31, 2016 Reporting Period

The City will implement the following activities as part of their Public Involvement and Participation Program during the 2015-2016 reporting period. To evaluate the success of the program and aid in preparing the required Annual Report, evaluation criteria have been established for each strategy.

Activity 1. Storm Water Conference/Public Meeting

The City will develop and coordinate an annual Storm Water Conference/Public Meeting for local businesses and residents. The second annual MS4 conference is currently scheduled for April 15, 2015. The City will develop and coordinate a third annual MS4 conference in 2015 or 2016.

This will be a joint outreach effort with all co-permittees participating. The agenda may include general information on the Gadsden-Etowah MS4, presentations pertaining to how common contaminants enter the storm water system, and presentations by key stakeholders such as the ADEM, Natural Resources and Conservation Service, and Clean Water Partnership. The purpose

of the conference/meeting will be to encourage public participation and input into the storm water management program.

Evaluation Criteria: The City will report the number of conference attendees and provide a copy of the agenda to demonstrate the focus of the conference. This information will help measure the degree of public education and involvement.

Activity 2. Partnerships in Educational and Public Involvement Events

The City will participate in and promote annual programs associated with the Coosa Basin Clean Water Partnership, Keep Etowah Beautiful, the Middle Coosa Watershed Project, and/or Alabama Power such as *Renew Our Rivers*, *Message in a Bottle*, and/or community cleanup days. Promotion methods may include co-sponsoring radio, television, and/or print advertisement with co-permittees and other stakeholders. City personnel will participate in the events.

Evaluation Criteria: The City will report number of City volunteers at the events and the ways in which the City promoted and/or advertised the event. This information will help measure the public awareness of the event and degree of public and City participation.

Activity 3. Promote and Participate in Renew Our Rivers

The City will participate in and promote the *Renew Our Rivers* program in the **November of 2015**. Promotion methods may include co-sponsoring radio, television, and/or print advertisement with co-permittees and other stakeholders. City personnel will participate in the event.

Evaluation Criteria: The City will report the number of City volunteers at the event and the ways in which the City promoted and/or advertised the event. This information will indicate the number of people who received educational materials and will help measure the public awareness of the event and degree of public participation.

Activity 4. Coordinate and Promote an Annual Community Cleanup Day

In addition to the *Renew our Rivers* program, the City will coordinate and promote an annual community cleanup day in targeting secondary waterways and primary contributing watersheds. Promotion methods may include co-sponsoring radio, television, and/or print advertisement with co-permittees and other stakeholders. City personnel will participate in the event.

Evaluation Criteria: The City will report number of volunteers and the ways in which the event was promoted and/or advertised. This information will indicate

the number of people who received educational materials and will help measure the public awareness of the event and degree of public participation.

Activity 5. Promote and Participate in the Etowah County Water Festival

The City will promote and participate in the annual *Etowah County Water Festival* through City resources. Promotion methods may include co-sponsoring radio, television, and/or print advertisement with co-permittees and other stakeholders. City personnel will participate in the festival.

Evaluation Criteria: The City will report number of City volunteers at the event and the ways in which the City promoted and/or advertised the event. This information will indicate the City's participation and will help measure the public awareness of the event and degree of public and City participation.

Activity 6. Public Reporting and Tracking System

The City will evaluate the electronic Storm Water Complaint Form developed during the 2012-2013 reporting period for the public to report non-compliant construction sites, illicit discharges (including spills or illegal dumping), impaired waterways, and violations of ordinances relating to storm water pollution. The City will evaluate the current public reporting and tracking methods.

The City will continue to track received complaints and the City's responses to the received complaints.

Evaluation Criteria: The City will report the total number of complaints received, the number of complaints addressed, and the number of complaints resolved during the reporting period. The City will also report whether or not the received reports contain the required information to find and address the suspected problem. The City will provide a summary of at least one complaint received during the reporting period. This information will help measure the effectiveness of the reporting system, as well as the public awareness and concern of storm water issues.

Activity 7. Map the Locations of Complaints

The City created a layer on the city GIS to record locations of all storm water complaints received from the public during the 2013-2014 reporting period. The City will continue to record locations of all storm water complaints, including reports of illicit discharges, received from the public.

Evaluation Criteria: The City will report the number of complaints received and added to the GIS layer. The City will provide an updated storm water map with the Annual Report showing the locations of the complaints received during the

reporting period. This information will be used during the Priority Area Evaluation, and to help measure the effectiveness of the reporting and tracking system.

4.2.3 Changes

The City of Gadsden requests the deletion of the Storm Drain Marking Program (Activity 2). The City has made efforts to find an organization to partner with who is interested in organizing and implementing this program. Therefore, the City wishes to focus its abilities on other strategies of the MS4 Program.

The City of Gadsden requests no other changes to the Public Involvement and Participation strategies identified in the 2012 SWMP.

4.2.4 Responsible Party

The City of Gadsden Engineering Department is responsible for overseeing, developing, and coordinating the Public Involvement and Participation efforts.

4.3 Illicit Discharge Detection and Elimination

4.3.1 2014 to 2015 Implementation Status

During the April 1, 2014 to March 31, 2015 reporting period, the City of Gadsden completed nineteen (19) of the twenty (20) Illicit Discharge Detection and Elimination strategies identified in the previous Annual Report and began work on the remaining one (1) strategy.

Topic-specific public announcement on illicit discharges is ready for filming (Activity 13); however, due to internal personnel issues (unexpected death of the media director's wife) and inclement weather, filming did not take place during the reporting period.

The City of Gadsden also completed one (1) strategy beyond those proposed in the previous Annual Report:

- Mr. Chad Hare and Mr. Jeremy Ward attended the Nonpoint Source Conference (Activity 20)

A table identifying each Illicit Discharge Detection and Elimination strategy planned for the 2014-2015 reporting period, a description of actions taken by the City of Gadsden, and a description of activities planned for the next reporting period is provided in **Appendix C**. Supporting documentation is also included in **Appendix C**.

4.3.2 Proposed Activities for the April 1, 2015 to March 31, 2016 Reporting Period

The City will implement the following activities as part of their Illicit Discharge Detection and Elimination Program during the 2015-2016 reporting period. To evaluate the success of the

program and aid in preparing the required Annual Report, evaluation criteria have been established for each strategy.

Identifying Priority Areas

Activity 1. Identify Priority Areas

The City delineated drainage basins in the 2014-2015 reporting period. The City will then re-evaluate the drainage basins by **April 30, 2015** to determine the Priority Areas for the 2015-2016 reporting period. Priority Areas will be identified using the illicit discharge potential (IDP) calculation procedures detailed in Section 3 of the IDDE Program. The City will maintain records of the IDP calculations for each drainage basin.

Evaluation Criteria: The City will report the total IDP score for each drainage basin and will provide an updated map showing the identified Priority Areas. The City will report drainage basins that are newly listed or de-listed from the previous reporting year's calculations.

Field Assessment Activities

Activity 2. Outfall Identification

The City will implement a stream-walking program designed to identify previously unknown outfalls to the MS4. The City also plans to map a portion of the waterbodies that receive discharge from the MS4 during the reporting period. The implementation process is detailed in Section 4 of the IDDE Program.

Evaluation Criteria: The City will maintain records of field observations. The City will report the number of outfalls identified and the stream length walked during the reporting period. The City will provide updated tables and maps that include the outfalls identified by the stream-walking program.

Activity 3. Probable Outfall Verification

Probable outfalls may be identified during mapping activities, during review of proposed development plans, or through illicit discharge reports. When a probable outfall is identified, it will be added to the GIS database and labeled as unverified.

The City will verify probable outfalls through field observation within 18 months of their addition to the Storm Water System Map. The implementation process is detailed in Section 4 of the IDDE Program.

Evaluation Criteria: The City will report the number of probable outfalls that were identified and the number of outfalls that were verified during the reporting

period. The City will provide updated tables and maps that include the verified outfalls, as well as probable outfalls that are planned to be verified in the following reporting period. The City will maintain records of field observations.

Activity 4. Outfall Reconnaissance Inventory

During the reporting period, the City or subcontracted crews will conduct dry weather monitoring of major outfalls in Priority Areas. The City will also inspect a portion of the outfalls located outside Priority Areas. The implementation process is detailed in Section 7 of the IDDE Program.

Evaluation Criteria: The City will maintain records of field observations. The City will report the number of outfalls inspected during the reporting period. The City will also provide a summary of the results of outfall reconnaissance inventory activities conducted during the reporting period.

Activity 5. Suspect Discharge Sampling

If a dry weather flow has a severity index of 3 on one or more indicators in Section 4 of the Outfall Reconnaissance Inventory Field Sheet, or if field screening indicates a suspect discharge, field crews will collect samples for further analysis. The implementation process is detailed in Section 7 of the IDDE Program.

Evaluation Criteria: The City will report the number of identified dry weather flows, suspect discharges, and samples collected during the reporting period. The City will report the analysis results for the collected samples. The City will report if the suspect discharge was confirmed to be an illicit discharge and, if known, the type of illicit discharge.

IDDE Investigation

Activity 6. Outfall Ranking

Data from each Outfall Reconnaissance Inventory Field Sheet will be analyzed to characterize the observed outfall as having obvious, suspect, possible, or unlikely discharge potential. Obvious and suspect illicit discharges will be investigated within 10 and 30 days, respectively. Potential illicit discharges will be investigated within 60 days. The implementation process is detailed in Section 7 of the IDDE Program.

Evaluation Criteria: The City will report the ranking of each outfall inspected during the reporting period. The City will report the number of outfalls that required further investigation.

Activity 7. Discharge Investigation

Illicit discharge investigations will be performed to determine the source of a discharge problem. The implementation process is detailed in Section 7 of the IDDE Program.

Evaluation Criteria: The City will report the number of illicit discharge investigations performed during the reporting period. The City will also report the number of confirmed illicit discharges, if a source was determined, and if the discharge was eliminated.

Corrective Action Record Keeping

Activity 8. Corrective Action Record Keeping

When a suspect illicit discharge or illicit connection is identified, a case log detailing pertinent information will be created. Throughout the problem investigation and corrective action activities, all information related to the incident or property in question will be documented in the case log.

Evaluation Criteria: The City will maintain records of the correction actions. The City will report the number of confirmed illicit discharges and the number of illicit discharges corrected or eliminated during the reporting period. The City will also report the number of confirmed illicit discharges where corrective action is pending.

Storm Water System Mapping

Activity 9. Update Storm Water System Map – Existing Features

The City of Gadsden will continue to expand the existing Storm Water System Map to include:

- The location of all outfalls (to include latitude and longitude) and the names and location of all waters of the State that receive discharges from those outfalls;
- Structural BMPs owned, operated, and maintained within the City limits;
- An update of known connections to the MS4 authorized or allowed by the City;
- Geographic areas which may discharge storm water into the MS4, which may not be located within the municipal boundary;
- Identification and location of waterways within the City including detention ponds, streams, and ditches.

The implementation process is further discussed in Section 5 of the IDDE Program.

Evaluation Criteria: The City will provide an updated Storm Water System Map showing the features added during the reporting period.

Activity 10. Update Storm Water System Map – Future Additions

Proposed additions within the City, including new storm sewer and drainage ditches, will be mapped based on the civil plans provided to the City or digitized by the City. Outfalls from proposed development will be verified after construction is complete, as part of Activity 3. The implementation process is further discussed in Section 5 of the IDDE Program.

Evaluation Criteria: The City will report the number of civil plans provided to the City and the number of verified new features or outfalls during the reporting period. The City will provide an updated Storm Water System Map showing the features added during the reporting period.

Illicit Discharge Ordinance

Activity 11. Evaluate IDDE Ordinance

Ordinance No. O-77-05, Section 108 currently regulates Illicit Discharge enforcement. The City of Gadsden will evaluate the effectiveness of Section 108 by **December 31, 2015**. If updates are required, the City will amend the existing ordinance or prepare a new ordinance.

Evaluation Criteria: The ordinance will be evaluated on its effectiveness in addressing identified illicit discharges and preventing repeat offenders. The City will report the number of complaints received, number of illicit discharges identified during the reporting period, the number of resolved violations, the number of repeat offenders, and the number of enforcement actions taken.

IDDE Public Education

Activity 12. Distribute Storm Water Educational Material

The City will develop and distribute storm water education material for inclusion in the 2013 Gadsden Water Works Annual Water Quality Report or through a separate mail-out. The educational material will highlight the identification and reporting of illicit discharges.

Evaluation Criteria: The City will report the number of households that received the mail-out during the reporting period. This information will indicate the number of people who received educational materials.

Activity 13. Public Service Announcement

The City will air at least one public service announcement on the GITN during the reporting period to provide contact information for reporting illicit discharges.

Evaluation Criteria: The City will report the dates announcements were aired during the reporting period and the topics. As the program develops, the City will consider performing a survey of employees and/or residents to determine if the announcements are being heard and are effective.

Activity 14. Public Reporting and Tracking

The City will evaluate the electronic Storm Water Complaint Form developed during the 2012-2013 reporting period for the public to report non-compliant construction sites, illicit discharges (including spills or illegal dumping), impaired waterways, and violations of ordinances relating to storm water pollution.

The City will continue to track received complaints and the City's responses to the received complaints.

Evaluation Criteria: The City will report the total number of complaints received, the number of complaints addressed, and the number of complaints resolved during the reporting period. The City will also report whether or not the received reports contain the required information to find and address the suspected problem. The City will provide a summary of at least one complaint received during the reporting period. This information will help measure the effectiveness of the reporting system, as well as the public awareness and concern of storm water issues.

Activity 15. Map the Locations of Complaints

The City created a layer on the city GIS to record locations of all storm water complaints received from the public during the 2013-2014 reporting period. The City will continue to record locations of all storm water complaints, including reports of illicit discharges, received from the public.

Evaluation Criteria: The City will report the number of complaints received and added to the GIS layer. The City will provide an updated Storm Water System Map showing the locations of the complaints received during the reporting period. This information will be used during the Priority Area Evaluation, and to help measure the effectiveness of the reporting and tracking system.

Activity 16. Municipal Training

Municipal workers will be trained in the identification of illicit discharges as well as the prevention of storm water pollution at municipal facilities or related to municipal activities. Specific municipal operations such as fueling, vehicle maintenance, vehicle washing, paint and paint waste storage and disposal, and used oil disposal may be addressed. The next training session will be conducted by **March 31, 2016.**

Municipal workers will be notified of the procedures for reporting suspected illicit discharges to Jeramy Ward, Chief Engineering Aide, the City IDDE Program Manager, including the preferred method of contact (email) and the information to be included in the report (e.g., location, date, time, observations).

Evaluation Criteria: The City will provide details on the training topics presented to the municipal workers. The City will maintain attendance records and report the number of municipal workers trained during the reporting period. This information will help measure the municipal workers awareness of illicit discharges and storm water issues.

Storm Water Monitoring

Activity 17. Storm Water Monitoring Locations

Storm water monitoring locations were identified in the 2012 SWMP and were revised in January 2014. The City updated the existing Storm Water System Map to include these locations.

If additional storm water monitoring points are recommended as a result of the analysis of the monitoring data, the City will update the map with the revised or additional locations.

Evaluation Criteria: The City will provide an updated Storm Water System Map showing the features added during the reporting period.

Activity 18. Evaluation of Monitoring Data

In conjunction with the monitoring provisions of Section 2.2 of the SWMP, the City of Gadsden will evaluate the collected monitoring data for indicators of potential illicit discharges within the City and to assess the effectiveness of the BMPs in achieving the 2008 TMDL. Monitoring data will be incorporated into the GIS database to facilitate evaluation and identification of impacted outfalls or contributing sub-watersheds.

Evaluation Criteria: The City will report which monitoring points appear to

have relatively higher pollutant loads. The City will make recommendations to the Gadsden-Etowah MS4 Storm Water Steering Committee to add and/or modify monitoring points to better characterize discharges from the MS4.

NPDES Industrial Permitting

Activity 19. As authorized by the Clean Water Act, the NPDES Permit program controls water pollution by regulating point sources that discharge pollutants into waters of the United States. Title 40, Part 122 of the Code of Federal Regulations (40CFR122) specifies that discharges associated with certain industrial activities must obtain an NPDES permit. The ADEM currently provides for individual and general NPDES permitting.

Information pertaining to permitted facilities will be obtained from available public sources such as MYWATERS Mapping, EPA ECHO Database, and ADEM E-file and incorporated into the GIS database. This information will be used in conjunction with the storm water system mapping and monitoring data to evaluate potential sources of storm water pollution and to identify unpermitted facilities.

Unpermitted facilities that require an NPDES permit will be reported to the Industrial Section of the ADEM. The City of Gadsden continues to rely on the ADEM for industrial NPDES permitting and enforcement.

Evaluation Criteria: The City will provide the number of permitted facilities reported to ADEM during the reporting period, if any. This information will help measure the effectiveness of the land use evaluations.

4.3.3 Changes

The City of Gadsden requests no changes to the Illicit Discharge Detection and Elimination strategies identified in the 2012 SWMP.

4.3.4 Responsible Party

The City of Gadsden Engineering Department is responsible for overseeing, developing, and coordinating the IDDE program within the regulated City of Gadsden MS4 area.

4.4 Construction Site Storm Water Runoff

4.4.1 2014 to 2015 Implementation Status

During the April 1, 2014 to March 31, 2015 reporting period, the City of Gadsden completed seven (7) of the seven (7) Construction Site Storm Water Runoff strategies identified in the previous Annual Report.

The City of Gadsden also completed two (2) strategy beyond those proposed in the previous Annual Report:

- The City of Gadsden provided an all-inclusive pamphlet on storm water impacts from construction site runoff to individuals requesting building/development permits (Activity 8)
- The City of Gadsden maintained EPA posters on storm water and the Construction Industry outside the Building Department window (Activity 9)

A table identifying each Construction Site Storm Water Runoff strategy planned for the 2014-2015 reporting period, a description of actions taken by the City of Gadsden, and a description of activities planned for the next reporting period is provided in **Appendix C**. Supporting documentation is also included in **Appendix C**.

4.4.2 Proposed Activities for the April 1, 2015 to March 31, 2016 Reporting Period

The City will implement the following activities as part of their Construction Site Storm Water Runoff Program during the 2015-2016 reporting period. To evaluate the success of the program and aid in preparing the required Annual Report, evaluation criteria have been established for each strategy.

Activity 1. Erosion and Sediment Control Ordinance

The City will evaluate the effectiveness of Ordinance 0-77-05, which regulates storm water management within the City, by **December 31, 2015**. If changes are warranted, a new or revised ordinance will be approved and implemented.

Evaluation Criteria: The ordinance will be evaluated on its effectiveness in addressing erosion and sediment control. The City will report the number of non-compliant construction sites identified by the City, the number of enforcement actions taken, the number of non-compliant sites reported to the ADEM, and whether the individuals or businesses responsible for identified non-compliant construction sites are repeat offenders.

Activity 2. Construction Site Inspection Program

Designated City personnel will inspect all qualifying construction sites within 60 days of initial disturbance, at periodic intervals during construction, and following stabilization. The Building Department Inspectors and Engineering Department personnel work together to perform the necessary inspections and implement work orders when sites are non-compliant.

The City will evaluate the effectiveness of the construction site inspection program by **December 31, 2015**.

Evaluation Criteria: The City will report the number of inspections completed, the number of non-compliant construction sites identified by the City, the number of enforcement actions taken, the number of non-compliant sites reported to the ADEM, and whether the individuals or business responsible for identified non-compliant construction sites are repeat offenders. The City will also provide a summary of at least one inspection conducted during the reporting period that resulted in enforcement actions.

Activity 3. Sediment and Erosion Control Plan Review

The City will continue to review Sediment and Erosion Control Plans and Storm Water Management Plans for all new construction, prior to the approval or denial of a land disturbance permit application.

Plan review will ensure proposed projects adequately address the City's erosion, sediment, and pollution control requirements. Plan review will also take into consideration what potential impacts to water quality the project may have.

Evaluation Criteria: The City will report the total number of plans reviewed, the number of plans approved or rejected during the reporting period, and number of plans that meet the requirements the Alabama Construction General Permit.

Activity 4. BMP Training Program

City personnel tasked with plan review and/or conducting BMP inspections will undergo annual training on proper design, installation, inspection, and maintenance of on-site control measures and on new technology and practices. All inspectors will complete initial storm water awareness training and attend annual refreshers.

Jeremy Ward was certified as a QCI in 2012 (QCI #T1329). QCI certification will be maintained through the approved annual refresher courses. Jeremy Ward will attend a 4-hour QCI continuing education course by **June 2014**. Jeremy Ward trains other City personnel on the City's construction site inspection protocols.

Should additional inspectors be needed, they will be trained accordingly.

Evaluation Criteria: The City will provide a copy of the QCI certificates and records of awareness training received during the reporting period.

Activity 5. Public Reporting and Tracking

The City will evaluate the electronic Storm Water Complaint Form developed during the 2012-2013 reporting period for the public to report non-compliant construction sites.

The City will continue to track received complaints and the City's responses to the received complaints.

Evaluation Criteria: The City will report the total number of complaints received, the number of complaints addressed, and the number of complaints resolved during the reporting period. The City will also report whether or not the received reports contain the required information to find and address the suspected problem. The City will provide a summary of at least one complaint received during the reporting period. This information will help measure the effectiveness of the reporting system, as well as the public awareness and concern regarding construction storm water issues.

Activity 6. Map the Locations of Complaints

The City created a layer on the city GIS to record locations of all storm water complaints received from the public during the 2013-2014 reporting period. The City will continue to record locations of all storm water complaints, including reports of non-compliant construction sites, received from the public.

Evaluation Criteria: The City will report the number of complaints received and added to the GIS layer. The City will provide an updated storm water map with the Annual Report showing the locations of the added complaints. This information will be used during the Priority Area Evaluation, and to help measure the effectiveness of the reporting and tracking system.

Activity 7. Notify ADEM of Non-Compliant Sites

The City will notify the ADEM of any construction sites where a possible violation of the Clean Water Act has occurred. Possible violations may include, but are not limited to, releases of sediment to a water of the State or failure to initiate corrective actions following an inspection by the City.

The City of Gadsden continues to rely on the ADEM for construction NPDES enforcement.

Evaluation Criteria: The City will report the total number of non-compliant construction sites reported to ADEM during the reporting period.

4.4.3 Changes

The City of Gadsden requests no changes to the Construction Site Storm Water Runoff strategies identified in the 2012 SWMP.

4.4.4 Responsible Party

The City of Gadsden Planning Department and Engineering Department are responsible for implementing and tracking the construction site storm water provisions of the ordinance as well as other Construction Site Storm Water Runoff strategies.

4.5 Post-Construction Storm Water Management

4.5.1 2014 to 2015 Implementation Status

During the April 1, 2014 to March 31, 2015 reporting period, the City of Gadsden completed four (4) of the four (4) Post-Construction Storm Water Management strategies identified in the previous Annual Report.

A table identifying each Post-Construction Storm Water Management strategy planned for the 2014-2015 reporting period, a description of actions taken by the City of Gadsden, and a description of activities planned for the next reporting period is provided in **Appendix C**. Supporting documentation is also included in **Appendix C**.

4.5.2 Proposed Activities for the April 1, 2015 to March 31, 2016 Reporting Period

The City will implement the following activities as part of their Post-Construction Storm Water Management Program during the 2015-2016 reporting period. To evaluate the success of the program and aid in preparing the required Annual Report, evaluation criteria have been established for each strategy.

Activity 1. Reducing Post-Construction Runoff Volume

Ordinance No. O-77-05, Section 108-6 provides for post-construction storm water management measures to reduce runoff volume. Specifically, all sites are required to have at least 10% vegetated area, and re-vegetated areas are required to have a minimum 75% survival of the cover crop for one year.

The ordinance will be evaluated by **December 31, 2015**. If changes are warranted, a new or revised ordinance will be approved and implemented.

Evaluation Criteria: The ordinance will be evaluated on its effectiveness in reducing runoff from new development or redevelopment. The City will report how many submitted plans meet or exceed the 10% green area rule, the number of enforcement actions taken, and an assessment of whether 75% survival of cover crops is achieved at constructions sites across the City during the reporting period.

Activity 2. Reducing Pollutants from Development

Ordinance No. O-77-05, Section 108-7 requires that storm water runoff be controlled to prevent pollution of local waters and provides a list of possible

control measures.

The ordinance will be evaluated by **December 31, 2015**. If changes are warranted, a new or revised ordinance will be approved and implemented.

Evaluation Criteria: The ordinance will be evaluated on its effectiveness in reducing pollutants in runoff from new development or redevelopment. The evaluation may also examine which control measures are typically utilized and if additional examples should be added to the ordinance. The City will report the number of developments where treatment of storm water runoff is required and the criteria for requiring treatment of storm water runoff.

Activity 3. Long-Term Maintenance of Storm Water Controls

Ordinance No. O-77-05, Section 108-6 requires long-term maintenance of storm water control structures and provides for the City to require inspection, funding, and planning for permanent storm water management structures. Section 108-5 requires that the design and planning of all storm water management facilities include detailed maintenance and repair procedures.

The ordinance will be evaluated by **December 31, 2015**. If changes are warranted, a new or revised ordinance will be approved and implemented.

Evaluation Criteria: The ordinance will be evaluated on its effectiveness in addressing long-term maintenance of storm water controls. The City will report the number of submitted plans that include detailed maintenance procedures, the number of maintenance agreements reviewed, the number of maintenance provisions approved or denied, and the number of enforcement actions taken during the reporting period.

Activity 4. Evaluate Obstacles to Low Impact/Green Development

During the evaluation of the current zoning ordinance, the City identified legal issues with codes and ordinances regarding green infrastructure and low-impact development techniques. The City will continue efforts to resolve conflicts between green infrastructure practices and existing codes and ordinances during the reporting period. The City will update current subdivision regulations to allow green infrastructure components once conflicts are resolved.

Evaluation Criteria: The City will report the number of permits issued and number of projects that incorporate these techniques during the reporting period. The City will also report how the conflicts were resolved.

4.5.3 Changes

The City of Gadsden requests no changes to the Post-Construction Storm Water Management strategies identified in the 2012 SWMP.

4.5.4 Responsible Party

The City of Gadsden Planning Department and Engineering Department are responsible for implementing and tracking the provisions of the ordinance pertaining to post-construction storm water management.

4.6 Pollution Prevention and Good Housekeeping for Municipal Operations

4.6.1 2014 to 2015 Implementation Status

During the April 1, 2014 to March 31, 2015 reporting period, the City of Gadsden completed six (6) of the six (6) Pollution Prevention and Good Housekeeping for Municipal Operations strategies identified in the previous Annual Report.

The City of Gadsden also completed eight (8) strategies beyond those proposed in the previous Annual Report. These strategies include:

- The installation of petroleum spill kits on municipal trucks and equipment (Activity 7)
- The provision of brush and leaf pick-up throughout the City (Activity 8)
- Jeramy Ward submitted an application to EnviroCert International, Inc. to become a Certified Professional in Erosion and Sediment Control (Activity 9)
- Jeramy Ward submitted an application to EnviroCert International, Inc. to become a Certified Municipal Separate Storm Sewer System Specialist (CMS4S) (Activity 10)
- Inmates crews are used to pick up litter throughout the city (Activity 11)
- The City of Gadsden enforces its litter ordinance (Activity 12)
- The City of Gadsden recycles copy paper and newspapers at City Hall (Activity 13)
- The City's Public Works Department retrieved and disposed of 161 tires from a swamp near the James D. Wildlife Park (Activity 14)

A table identifying each Pollution Prevention and Good Housekeeping for Municipal Operations strategy planned for the 2014-2015 reporting period, a description of actions taken by the City of Gadsden, and a description of activities planned for the next reporting period is provided in **Appendix C**. Supporting documentation is also included in **Appendix C**.

4.6.2 Proposed Activities for the April 1, 2015 to March 31, 2016 Reporting Period

The City will implement the following activities as part of their Pollution Prevention and Good Housekeeping for Municipal Operations Program during the 2015-2016 reporting period. To evaluate the success of the program and aid in preparing the required Annual Report, evaluation criteria have been established for each strategy.

Activity 1. Employee Training

The City will continue to implement a training program for municipal employees that focus on pollution prevention, good housekeeping measures, identification of potential illicit discharges, and other potential threats to storm water quality. Training materials will focus on vehicle, roadway, and building maintenance, herbicides, pesticides, and street cleaning.

The next training session will be conducted by **March 31, 2016**.

Evaluation Criteria: The City will provide details on the training topics presented to municipal workers during the reporting period. The City will keep attendance records and report the number of municipal workers trained during the reporting period. This information will help measure the municipal workers awareness of storm water issues.

Activity 2. Vehicle Maintenance Program

The City of Gadsden owns and operates a variety of vehicles and equipment used in municipal operations and maintenance, including passenger cars, trucks, vans, and equipment. The City will conduct routine maintenance on owned vehicles and will inspect vehicles for the presence of fluid leaks during routine maintenance. The City will promptly repair vehicles determined to have leaks. The City will log all repairs with an inspection checklist created during the 2013-2014 reporting period.

Evaluation Criteria: The City will provide a completed inspection log for at least one vehicle used during the reporting period. The City will report the frequency of inspections and the number of vehicle or equipment leaks identified during the reporting period as a result of the inspection program. This information will help measure the effectiveness of the vehicle inspection and maintenance program.

Activity 3. Vehicle Wash Areas

The City currently operates a vehicle wash pad with an oil/water separator at the municipal fleet maintenance facility. The C&D Landfill has a permitted wash area for vehicles and equipment. The municipal golf course has established a wash area with an oil/water separator for carts. These locations are inspected as a requirement of their NPDES permit. During the annual BMP training, the City will notify all employees of the locations of the designated wash areas.

The City discontinued use of phosphate-containing soaps for municipal vehicle washing areas.

Evaluation Criteria: The City will report the number of designated municipal vehicle washing areas. The City will also keep attendance records and report the number of municipal workers trained during the reporting period. This information will help measure the municipal workers awareness of storm water issues.

Activity 4. Pesticide Application

Pesticide application in City Right of Ways is performed by EDKO, Inc. Prior to entering into or renewing any additional contracts the City will require the contractor to provide all necessary certifications and licensing during the bid process.

The City has a Mosquito Control Program and has obtained an NPDES permit (ALG870020) from ADEM for application practices. The City will follow ADEM regulations regarding mosquito pesticide application.

To reduce potential impact to waterways, the Public Works Department will review all areas where pesticides are to be used.

The City will comply with pesticide application and disposal regulations.

Evaluation Criteria: The City will maintain a copy of the current certification. The City will report the number of areas where it was determined pesticides impacted waterways during the reporting period, if any, and how the impact was resolved. A Storm Water System Map showing the location of these areas will be provided in the Annual Report. This information will help measure the effectiveness of the City's review.

Activity 5. Street Sweeping

The City currently performs street sweeping of primary and secondary streets five days a week. One sweeper works during the day and the other at night. The City will continue to implement a street sweeping program.

Evaluation Criteria: The City will describe how roads are prioritized. The City will also report the number of scheduled road cleanings, the number of roads that are swept each month, and pounds of debris collected from street sweeping during the reporting period. This information will help measure the effectiveness of the street sweeping program.

Activity 6. BMP Plans for Municipal Facilities

City departments with operations that might impact storm water will develop and implement operation and/or Best Management Practices Plans outlining procedures that are protective of storm water.

BMP Plans currently in place at municipal facilities will be maintained to reflect current operations.

Evaluation Criteria: The City will report where plans are stored and if new plans are established during the reporting period. This information will help measure the awareness and concern of storm water issues throughout the municipal operations.

4.6.3 Changes

The City of Gadsden requests no changes to the Pollution Prevention and Good Housekeeping for Municipal Operations strategies identified in the 2012 SWMP.

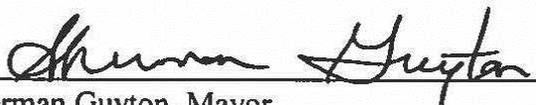
4.6.4 Responsible Party

The City of Gadsden Planning Department and Engineering Department are responsible for implementing and tracking Pollution Prevention and Good Housekeeping strategies within municipal operations.

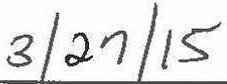
4.7 Agency Certification

This Annual Report is produced jointly by the eight jurisdictions comprising the Gadsden-Etowah Phase II Small Municipal Separate Storm Sewer System. Implementation of the minimum control measures applicable to each jurisdiction is the responsibility of the individual jurisdiction. Implementation of the storm water monitoring component of the Storm Water Management Program is a joint responsibility of all jurisdictions.

I certify under penalty of law that this document and all attachments pertaining to the City of Gadsden were prepared under my directions or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated 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 or imprisonment for knowing violations.



Sherman Guyton, Mayor
City of Gadsden, Alabama



Date

5. RAINBOW CITY

Rainbow City encompasses 10.2% of the Urbanized Area and accounts for 11.3% of the population.

In accordance with Part III.B of the NPDES General Permit, the 2012 Storm Water Management Program detailed the specific activities Rainbow City planned to undertake regarding the following six minimum control measures:

1. Public Education and Outreach on Storm Water Impacts
2. Public Involvement/Participation
3. Illicit Discharge Detection and Elimination (IDDE)
4. Construction Site Storm Water Runoff Control
5. Post-Construction Storm Water Management in New Development and Redevelopment
6. Pollution Prevention/Good Housekeeping for Municipal Operations

The following sections detail the current implementation status of each minimum control measure, activities conducted during the current reporting period, planned activities for the upcoming reporting period, requested changes to the provisions of the 2012 SWMP, and the party responsible for implementing each minimum control measure.

5.1 Public Education and Outreach

5.1.1 2014 to 2015 Implementation Status

During the April 1, 2014 to March 31, 2015 reporting period, Rainbow City completed eight (8) of the eight (8) Public Education and Outreach strategies identified in the previous Annual Report.

Rainbow City also completed six (6) strategies beyond those proposed in the previous Annual Report. These strategies included:

- Rainbow City's website has a pharmaceuticals and personal care products (PPCPs) webpage to provide educational information on concerns and disposal (Activity 9)
- Rainbow City educates the public on storm water information and events at City Council Meetings (Activity 10)
- Rainbow City maintains numerous "No Littering" Signs within the City and enforces an Anti Litter Ordinance # 506 that results in a \$500 fine (Activity 11)
- Rainbow City built a running trail between Hwy 411 and Lumley Road to promote outdoor recreational use and appreciation (Activity 12)
- Rainbow City supports the Beautification Board (Activity 13)
- Rainbow City promoted and participated in Community Clean-up Day in April 2014 as well as provided educational materials for the volunteers (Activity 14)

A table identifying each Public Education and Outreach strategy planned for the 2014-2015 reporting period, a description of actions taken by Rainbow City, and a description of activities planned for the next reporting period is provided in **Appendix D**. Supporting documentation is also included in **Appendix D**.

5.1.2 Proposed Activities for the April 1, 2015 to March 31, 2016 Reporting Period

The City will implement the following activities as part of their Public Education and Outreach Program during the 2015-2016 reporting period. To evaluate the success of the program and aid in preparing the required Annual Report, evaluation criteria have been established for each strategy.

Activity 1. Distribute Storm Water Educational Material

The City will develop education materials for the public and have them available at City Hall. These materials will be available year round. The educational material may:

- Introduce MS4 to the general public and discuss the storm water cycle and how common contaminants enter the storm water system.
- Educate households and businesses about proper and improper use, storage, and disposal of common household chemicals such as herbicides, pesticides, and fertilizers.
- Make the public aware of how the improper use of these chemicals can impact storm water quality.
- Discuss how the cumulative effects of these contaminants impact the Coosa River and what individual households and businesses can do to reduce storm water pollutants.
- Provide information on additional resources pertaining to storm water, storm water pollution, and Neely Henry Lake TMDLs.
- Provide information on storm water contacts within Rainbow City and provide information on reporting potential storm water violations.

Evaluation Criteria: The City will report the number of materials placed at the City Hall and how often the materials were replaced during the reporting period. This information will indicate the number of people who received educational materials.

Activity 2. Maintain the Storm Water Web Page

The City will regularly update the Storm Water web page on Rainbow City web site that was developed during the 2012-2013 reporting period. The web page will:

- Include general information on the Gadsden-Etowah MS4;
- Discuss the storm water cycle and how common contaminants enter the storm water system;
- Provide links to related storm water resources;
- Provide contact information for reporting illicit discharges; and,
- Provide a calendar of upcoming community events related to storm water outreach.

Evaluation Criteria: The City will report what information was added to the webpage and the number of “hits” on the webpage. The City has an additional target of **100 contacts** for the reporting period. This information will indicate the number of people who view the webpage and the associated educational materials.

Activity 3. Partnerships in Educational and Public Involvement Events

The City will partner with Keep Etowah Beautiful, the Middle Coosa Watershed Project, and/or Alabama Power to distribute storm water educational material and promote events such as *Renew Our Rivers*, *Message in a Bottle*, and/or community cleanup days. The events will be advertised at the City Hall, Library, and/or other businesses. Promotion methods may include co-sponsoring radio, television, and/or print advertisement with co-permittees and other stakeholders. City personnel will participate in the events.

Evaluation Criteria: The City will report number of participants who received educational materials during the events and the ways in which the City promoted and/or advertised the events. This information will indicate the number of people who received educational materials and will help measure the public awareness of the event and degree of public participation.

Activity 4. Promote Water Quality Awareness Week

The City will promote the 2015 *Water Quality Awareness Week* through City resources including co-sponsoring radio, television, and print advertisement with co-permittees and other stakeholders.

Evaluation Criteria: The City will report activities associated with this event and the ways in which the City promoted *Water Quality Awareness Week*. This information will help measure the public awareness of the event and degree of public and City participation.

Activity 5. Promote and Participate in the Etowah County Water Festival

The City will promote and participate in the annual *Etowah County Water Festival* through City resources. Promotion methods may include co-sponsoring

radio, television, and/or print advertisement with co-permittees and other stakeholders. City personnel will participate in the festival.

Evaluation Criteria: The City will report number of City volunteers at the event and the ways in which the City promoted / advertised the event. This information will indicate the City’s participation and will help measure the public awareness of the event and degree of public and City participation.

Activity 6. Provide Information on Construction Site Storm Water Impacts

The City will provide pre-printed information on how construction site runoff can impact storm water quality to individuals requesting plan review and building/development permits.

Evaluation Criteria: The City will report the number of permits issued during the reporting period. This information will indicate the number of people who received educational materials.

Activity 7. Provide Information on Low Impact/Green Development

The City will provide pre-printed educational information on green development. Information may include references to additional resources such as the Green Building Alliance, Low Impact Development Center, and U.S. Department of Housing and Urban Development. The City will provide information to individuals requesting plan review and building/development permits.

The City will encourage developers and engineers to consider green infrastructure alternatives during the plan review process.

Evaluation Criteria: The City will report the number of permits issued and number of projects that incorporate these techniques during the reporting period. This information will indicate the number of people who received educational materials.

Activity 8. Gadsden-Etowah MS4 Steering Committee Meetings

The City will coordinate and/or participate in quarterly meetings of the Stormwater Steering Committee for entity updates, networking, and coordination of activities and BMP strategies.

Evaluation Criteria: The City will provide meeting agendas during the reporting period. The City will keep attendance records. This information will indicate the participation of the steering committee and their interest in networking and coordination of activities.

5.1.3 Changes

Rainbow City requests no changes to the Public Education and Outreach strategies identified in the 2012 SWMP.

5.1.4 Responsible Party

The Rainbow City Engineering Department is responsible for overseeing, developing, and coordinating the Public Education and Outreach efforts.

5.2 Public Involvement and Participation

5.2.1 2014 to 2015 Implementation Status

During the April 1, 2014 to March 31, 2015 reporting period, Rainbow City completed five (5) of the six (6) Public Involvement and Participation strategies identified in the previous Annual Report and began working on the remaining one (1) strategy.

Rainbow City along with the Gadsden-Etowah Steering Committee scheduled a Second Annual MS4 Conference again February 25, 2015; however due to inclement weather forecast the conference was postponed two days before the conference. The County received 8 inches of snow that day. The Conference has been rescheduled for April 15, 2015 (Activity 1).

Rainbow City also completed five (5) strategies beyond those proposed in the previous Annual Report. These strategies included:

- Mr. Heath Williamson attended the ADEM Nonpoint Source Conference (Activity 7)
- Mr. Heath Williamson attended Message in the Bottle Symposium (Activity 8)
- Rainbow City educates the public on storm water information and events at City Council Meetings (Activity 9)
- Rainbow City built a running trail between Hwy 411 and Lumley Road to promote outdoor recreational use and appreciation (Activity 10)
- Rainbow City supports the Beautification Board (Activity 11)

A table identifying each Public Involvement and Participation strategy planned for the 2014-2015 reporting period, a description of actions taken by Rainbow City, and a description of activities planned for the next reporting period is provided in **Appendix D**. Supporting documentation is also included in **Appendix D**.

5.2.2 Proposed Activities for the April 1, 2015 to March 31, 2016 Reporting Period

The City will implement the following activities as part of their Public Involvement and Participation Program during the 2015-2016 reporting period. To evaluate the success of the program and aid in preparing the required Annual Report, evaluation criteria have been established for each strategy.

Activity 1. Storm Water Conference/Public Meeting

The City will develop and coordinate an annual Storm Water Conference/Public Meeting for local businesses and residents. The second annual MS4 conference is currently scheduled for April 15, 2015. The City will develop and coordinate a third annual MS4 conference in 2015 or 2016.

This will be a joint outreach effort with all co-permittees participating. The agenda may include general information on the Gadsden-Etowah MS4, presentations pertaining to how common contaminants enter the storm water system, and presentations by key stakeholders such as the ADEM, Natural Resources and Conservation Service, and Clean Water Partnership. The purpose of the conference/meeting will be to encourage public participation and input into the storm water management program.

Evaluation Criteria: The City will report the number of conference attendees and provide a copy of the agenda to demonstrate the focus of the conference. This information will help measure the degree of public education and involvement.

Activity 2. Partnerships in Educational and Public Involvement Events

The City will participate in and promote annual programs associated with the Coosa Basin Clean Water Partnership, Keep Etowah Beautiful, the Middle Coosa Watershed Project, and/or Alabama Power such as *Renew Our Rivers*, *Message in a Bottle*, and/or community cleanup days. Promotion methods may include co-sponsoring radio, television, and/or print advertisement with co-permittees and other stakeholders. City personnel will participate in the events.

Evaluation Criteria: The City will report number of City volunteers at the events and the ways in which the City promoted and/or advertised the event. This information will help measure the public awareness of the event and degree of public and City participation.

Activity 3. Promote and Participate in Renew Our Rivers

The City will participate in and promote the *Renew Our Rivers* program in the **November of 2015**. The event will be advertised at the City Hall, Library and other businesses. Promotion methods may include co-sponsoring radio, television, and/or print advertisement with co-permittees and other stakeholders. City personnel will participate in the event.

Evaluation Criteria: The City will report the number of City volunteers at the event and the ways in which the City promoted and/or advertised the event. This information will indicate the number of people who received educational

materials and will help measure the public awareness of the event and degree of public participation.

Activity 4. Coordinate and Promote an Annual Community Cleanup Day

In addition to the *Renew our Rivers* program, the City will coordinate and promote an annual community cleanup day in **November of 2015** targeting secondary waterways and primary contributing watersheds. Promotion methods may include co-sponsoring radio, television, and/or print advertisement with co-permittees and other stakeholders. City personnel will participate in the event.

Evaluation Criteria: The City will report number of volunteers and the ways in which the event was promoted and/or advertised. This information will indicate the number of people who received educational materials and will help measure the public awareness of the event and degree of public participation.

Activity 5. Promote and Participate in the Etowah County Water Festival

The City will promote and participate in the annual *Etowah County Water Festival* through City resources. Promotion methods may include co-sponsoring radio, television, and/or print advertisement with co-permittees and other stakeholders. City personnel will participate in the festival.

Evaluation Criteria: The City will report number of City volunteers at the event and the ways in which the City promoted and/or advertised the event. This information will indicate the City's participation and will help measure the public awareness of the event and degree of public and City participation.

Activity 6. Public Reporting and Tracking System

The City currently provides contact numbers for the Engineering Department and the Dispatch Office on the Storm Water web page for members of the public to report non-compliant construction sites, illicit discharges (including spills or illegal dumping), impaired waterways, and violations of ordinances relating to storm water pollution. The City will evaluate the current public reporting and tracking methods.

The City will continue to track received complaints and the City's responses to the received complaints.

Evaluation Criteria: The City will report the total number of complaints received, the number of complaints addressed, and the number of complaints resolved during the reporting period. The City will also report whether or not the received reports contain the required information to find and address the suspected problem. The City will provide a summary of at least one complaint

received during the reporting period. This information will help measure the effectiveness of the reporting system, as well as the public awareness and concern of storm water issues.

5.2.3 Changes

Rainbow City requests no changes to the Public Involvement and Participation strategies identified in the 2012 SWMP.

5.2.4 Responsible Party

The Rainbow City Engineering Department is responsible for overseeing, developing, and coordinating the Public Involvement and Participation efforts.

5.3 Illicit Discharge Detection and Elimination

5.3.1 2014 to 2015 Implementation Status

During the April 1, 2014 to March 31, 2015 reporting period, Rainbow City completed sixteen (16) of the seventeen (17) Illicit Discharge Detection and Elimination strategies identified in the previous Annual Report and began working on the remaining one (1) strategy

Rainbow City did not add the stormwater monitoring data to the GIS database. The City will add the monitoring data from 2014 and 2015 during the next reporting period (Activity 16).

Rainbow City also completed three (3) strategies beyond those proposed in the previous Annual Report. These strategies included:

- Mr. Heath Williamson attended the ADEM Nonpoint Source Conference (Activity 18)
- Rainbow City hired an Environmental Officer on April 14, 2014 (Activity 19)
- Rainbow City removed scrap tires from the City shop (Activity 20)

A table identifying each Illicit Discharge Detection and Elimination strategy planned for the 2014-2015 reporting period, a description of actions taken by Rainbow City, and a description of activities planned for the next reporting period are provided in **Appendix D**. Supporting documentation is also included in **Appendix D**.

5.3.2 Proposed Activities for the April 1, 2015 to March 31, 2016 Reporting Period

The City will implement the following activities as part of their Illicit Discharge Detection and Elimination Program during the 2015-2016 reporting period. To evaluate the success of the program and aid in preparing the required Annual Report, evaluation criteria have been established for each strategy.

Identifying Priority Areas

Activity 1. Identify Priority Areas

The City delineated drainage basins in the 2014-2015 reporting period. The City will then re-evaluate the drainage basins by **April 30, 2015** to determine the Priority Areas for the 2015-2016 reporting period. Priority Areas will be identified using the illicit discharge potential (IDP) calculation procedures detailed in Section 3 of the IDDE Program. The City will maintain records of the IDP calculations for each drainage basin.

Evaluation Criteria: The City will report the total IDP score for each drainage basin and will provide an updated map showing the identified Priority Areas. The City will report drainage basins that are newly listed or de-listed from the previous reporting year's calculations.

Field Assessment Activities

Activity 2. Outfall Identification

The City will implement a stream-walking program designed to identify previously unknown outfalls to the MS4. The City also plans to map a portion of the waterbodies that receive discharge from the MS4 during the reporting period. The implementation process is detailed in Section 4 of the IDDE Program.

Evaluation Criteria: The City will maintain records of field observations. The City will report the number of outfalls identified and the stream length walked during the reporting period. The City will provide updated tables and maps that include the outfalls identified by the stream-walking program.

Activity 3. Probable Outfall Verification

Probable outfalls may be identified during mapping activities, during review of proposed development plans, or through illicit discharge reports. When a probable outfall is identified, it will be added to the Storm Water System Map and labeled as unverified.

The City will verify probable outfalls through field observation within 18 months of their addition to the Storm Water System Map. The implementation process is detailed in Section 4 of the IDDE Program.

Evaluation Criteria: The City will report the number of probable outfalls that were identified and the number of outfalls that were verified during the reporting period. The City will provide updated tables and maps that include the verified

outfalls, as well as probable outfalls that are planned to be verified in the following reporting period. The City will maintain records of field observations.

Activity 4. Outfall Reconnaissance Inventory

During the reporting period, the City or subcontracted crews will conduct dry weather monitoring of major outfalls in Priority Areas. The City will also inspect a portion of the outfalls located outside Priority Areas. The implementation process is detailed in Section 7 of the IDDE Program.

Evaluation Criteria: The City will maintain records of field observations. The City will report the number of outfalls inspected during the reporting period. The City will also provide a summary of the results of outfall reconnaissance inventory activities conducted during the reporting period.

Activity 5. Suspect Discharge Sampling

If a dry weather flow has a severity index of 3 on one or more indicators in Section 4 of the Outfall Reconnaissance Inventory Field Sheet, or if field screening indicates a suspect discharge, field crews will collect samples for further analysis. The implementation process is detailed in Section 7 of the IDDE Program.

Evaluation Criteria: The City will report the number of identified dry weather flows, suspect discharges, and samples collected during the reporting period. The City will report the analysis results for the collected samples. The City will report if the suspect discharge was confirmed to be an illicit discharge and, if known, the type of illicit discharge.

IDDE Investigation

Activity 6. Outfall Ranking

Data from each Outfall Reconnaissance Inventory Field Sheet will be analyzed to characterize the observed outfall as having obvious, suspect, possible, or unlikely discharge potential. Obvious and suspect illicit discharges will be investigated within 10 and 30 days, respectively. Potential illicit discharges will be investigated within 60 days. The implementation process is detailed in Section 7 of the IDDE Program.

Evaluation Criteria: The City will report the ranking of each outfall inspected during the reporting period. The City will report the number of outfalls that required further investigation.

Activity 7. Discharge Investigation

Illicit discharge investigations will be performed to determine the source of a discharge problem. The implementation process is detailed in Section 7 of the IDDE Program.

Evaluation Criteria: The City will report the number of illicit discharge investigations performed during the reporting period. The City will also report the number of confirmed illicit discharges, if a source was determined, and if the discharge was eliminated.

Corrective Action Record Keeping

Activity 8. Corrective Action Record Keeping

When a suspect illicit discharge or illicit connection is identified, a case log detailing pertinent information will be created. Throughout the problem investigation and corrective action activities, all information related to the incident or property in question will be documented in the case log.

Evaluation Criteria: The City will maintain records of the correction actions. The City will report the number of confirmed illicit discharges and the number of illicit discharges corrected or eliminated during the reporting period. The City will also report the number of confirmed illicit discharges where corrective action is pending.

Storm Water System Mapping

Activity 9. Update Storm Water System Map – Existing Features

Rainbow City will continue to expand the existing Storm Water System Map to include:

- The location of all outfalls (to include latitude and longitude) and the names and location of all waters of the State that receive discharges from those outfalls;
- Structural BMPs owned, operated, and maintained within the City limits;
- An update of known connections to the MS4 authorized or allowed by the City;
- Geographic areas which may discharge storm water into the MS4, which may not be located within the municipal boundary;
- Identification and location of waterways within the City including detention ponds, streams, and ditches.

The implementation process is further discussed in Section 5 of the IDDE Program.

Evaluation Criteria: The City will provide an updated Storm Map showing the features added during the reporting period.

Activity 10. Update Storm Water System Map – Future Additions

Proposed additions within the City, including new storm sewer and drainage ditches, will be mapped based on the civil plans provided to the City or digitized by the City. Outfalls from proposed development will be verified after construction is complete, as part of Activity 3. The implementation process is further discussed in Section 5 of the IDDE Program.

Evaluation Criteria: The City will report the number of civil plans provided to the City and the number of verified new features or outfalls during the reporting period. The City will provide an updated Storm Water System Map showing the features added during the reporting period.

Illicit Discharge Ordinance

Activity 11. Evaluate IDDE Ordinance

Section 11 of Ordinance No. 490 currently regulates Illicit Discharge enforcement. Rainbow City will evaluate the effectiveness of Section 11 by **December 31, 2015**. If updates are required, the City will amend the existing ordinance or prepare a new ordinance.

Evaluation Criteria: The ordinance will be evaluated on its effectiveness in addressing identified illicit discharges and preventing repeat offenders. The City will report the number of complaints received, number of illicit discharges identified during the reporting period, the number of resolved violations, the number of repeat offenders, and the number of enforcement actions taken.

IDDE Public Education

Activity 12. Distribute Storm Water Educational Material

The City will develop and distribute education materials highlighting identification and anonymous reporting of potential illicit discharges and have them available at City Hall.

Evaluation Criteria: The City will report the number of materials placed at the City Hall and how often the materials were replaced during the reporting period. This information will indicate the number of people who received educational materials.

Activity 13. Public Reporting and Tracking System

The City currently provides contact numbers for the Engineering Department and the Dispatch Office on the Storm Water web page for members of the public to report suspect illicit discharges. The City will evaluate the current public reporting and tracking methods.

The City will continue to track received complaints and the City's responses to the received complaints.

Evaluation Criteria: The City will report the total number of complaints received, the number of complaints addressed, and the number of complaints resolved during the reporting period. The City will also report whether or not the received reports contain the required information to find and address the suspected problem. The City will provide a summary of at least one complaint received during the reporting period. This information will help measure the effectiveness of the reporting system, as well as the public awareness and concern of storm water issues.

Activity 14. Municipal Training

Municipal workers will be trained in the identification of illicit discharges as well as the prevention of storm water pollution at municipal facilities or related to municipal activities. Specific municipal operations such as fueling, vehicle maintenance, vehicle washing, paint and paint waste storage and disposal, and used oil disposal may be addressed. The next training session will be conducted by **March 31, 2016**.

Municipal workers will be notified of the procedures for reporting suspected illicit discharges to Heath Williamson, City Engineer, the City IDDE Program Manager, including the preferred method of contact (email) and the information to be included in the report (e.g., location, date, time, observations).

Evaluation Criteria: The City will provide details on the training topics presented to the municipal workers. The City will maintain attendance records and report the number of municipal workers trained during the reporting period. This information will help measure the municipal workers awareness of illicit discharges and storm water issues.

Storm Water Monitoring

Activity 15. Storm Water Monitoring Locations

Storm water monitoring locations were identified in the 2012 SWMP and were revised in January 2014. The City updated the existing Storm Water System Map to include these locations.

If additional storm water monitoring points are recommended as a result of the analysis of the monitoring data, the City will update the map with the revised or additional locations.

Evaluation Criteria: The City will provide an updated Storm Water System Map showing the features added during the reporting period.

Activity 16. Evaluation of Monitoring Data

In conjunction with the monitoring provisions of Section 2.2 of the SWMP, Rainbow City will evaluate the collected monitoring data for indicators of potential illicit discharges within the City and to assess the effectiveness of the BMPs in achieving the 2008 TMDL.

Evaluation Criteria: The City will report which monitoring points appear to have relatively higher pollutant loads. The City will make recommendations to the Gadsden-Etowah MS4 Storm Water Steering Committee to add and/or modify monitoring points to better characterize discharges from the MS4.

NPDES Industrial Permitting

Activity 17. As authorized by the Clean Water Act, the NPDES Permit program controls water pollution by regulating point sources that discharge pollutants into waters of the United States. Title 40, Part 122 of the Code of Federal Regulations (40CFR122) specifies that discharges associated with certain industrial activities must obtain an NPDES permit. The ADEM currently provides for individual and general NPDES permitting.

Information pertaining to permitted facilities will be obtained from available public sources such as MYWATERS Mapping, EPA ECHO Database, and ADEM E-file and incorporated into the Storm Water System Map. This information will be used in conjunction with the storm water system mapping and monitoring data to evaluate potential sources of storm water pollution and to identify unpermitted facilities.

Unpermitted facilities that require an NPDES permit will be reported to the Industrial Section of the ADEM. Rainbow City continues to rely on the ADEM for industrial NPDES permitting and enforcement.

Evaluation Criteria: The City will provide the number of permitted facilities reported to ADEM during the reporting period, if any. This information will help measure the effectiveness of the land use evaluations.

5.3.3 Changes

Rainbow City requests no changes to the Illicit Discharge Detection and Elimination strategies identified in the 2012 SWMP.

5.3.4 Responsible Party

Rainbow City Engineering Department is responsible for overseeing, developing, and coordinating the IDDE program within the regulated Rainbow City MS4 area.

5.4 Construction Site Storm Water Runoff

5.4.1 2014 to 2015 Implementation Status

During the April 1, 2014 to March 31, 2015 reporting period, Rainbow City completed six (6) of the six (6) Construction Site Storm Water Runoff strategies identified in the previous Annual Report .

A table identifying each Construction Site Storm Water Runoff strategy planned for the 2014-2015 reporting period, a description of actions taken by Rainbow City, and a description of activities planned for the next reporting period is provided in **Appendix D**. Supporting documentation is also included in **Appendix D**.

5.4.2 Proposed Activities for the April 1, 2015 to March 31, 2016 Reporting Period

The City will implement the following activities as part of their Construction Site Storm Water Runoff Program during the 2015-2016 reporting period. To evaluate the success of the program and aid in preparing the required Annual Report, evaluation criteria have been established for each strategy.

Activity 1. Erosion and Sediment Control Ordinance

During the 2012-2013 reporting period, the City replaced Ordinance 455 with Ordinance 490. Rainbow City Ordinance No. 490 regulates storm water management within the City; Section 11 includes provisions to ensure compliance and provide for enforcement of the City storm water regulations.

Section 8.A of Ordinance 490 also states Erosion and Sediment Controls shall meet the design criteria set forth in the most recent edition of the *Alabama Handbook for Erosion Control, Sediment Control, and Stormwater Management on Construction Sites and Urban Areas*.

The City will evaluate the effectiveness of the Ordinance by **December 31, 2015**. If changes are warranted, a new or revised ordinance will be approved and implemented.

Evaluation Criteria: The ordinance will be evaluated on its effectiveness in addressing erosion and sediment control. The City will report the number of non-compliant construction sites identified by the City, the number of enforcement actions taken, the number of non-compliant sites reported to the ADEM, and whether the individuals or businesses responsible for identified non-compliant construction sites are repeat offenders.

Activity 2. Construction Site Inspection Program

The City established a Construction Site Inspection Program in April 2013. Designated City personnel will inspect all qualifying construction sites within 60 days of initial disturbance, at periodic intervals during construction, and following stabilization. The Engineering Department will perform all necessary inspections and implement enforcement when sites are non-compliant.

The City will evaluate the effectiveness of the construction site inspection program by **December 31, 2015**.

Evaluation Criteria: The City will report the number of inspections completed, the number of non-compliant construction sites identified by the City, the number of enforcement actions taken, the number of non-compliant sites reported to the ADEM, and whether the individuals or business responsible for identified non-compliant construction sites are repeat offenders. The City will also provide a summary of at least one inspection conducted during the reporting period that resulted in enforcement actions.

Activity 3. Sediment and Erosion Control Plan Review

Plan Reviews are required by Section 4 of Ordinance 490. The City will continue to review Sediment and Erosion Control Plans and Storm Water Management Plans submitted for all new construction, prior to the approval or denial of a land disturbance permit application.

Plan review will ensure proposed projects adequately address the City's erosion, sediment, and pollution control requirements. Plan review will also take into consideration what potential impacts to water quality the project may have.

Evaluation Criteria: The City will report the total number of plans reviewed, the number of plans approved or rejected during the reporting period, and number of plans that meet the requirements the Alabama Construction General Permit.

Activity 4. BMP Training Program

BMP inspections and plan review will be conducted by the Rainbow City Engineer. In accordance with Part III.B.4(b)(ii) of the Permit, the City Engineer will undergo annual training on proper design, installation, inspection, and maintenance of on-site erosion and sedimentation control measures and on new technology and practices.

Two employees of the Engineering Department will attend QCI training in **April 2014**. Should additional inspectors be needed, they will be trained accordingly.

Evaluation Criteria: The City will provide a copy of the QCI certificates and records of awareness training received during the reporting period.

Activity 5. Public Reporting and Tracking

The City currently provides contact numbers for the Engineering Department and the Dispatch Office on the Storm Water web page for members of the public to report non-compliant construction sites. The City will evaluate the current public reporting and tracking methods.

The City will continue to track received complaints and the City's responses to the received complaints.

Evaluation Criteria: The City will report the total number of complaints received, the number of addressed complaints, and the number of resolved complaints during the reporting period. The City will also report whether or not the received reports contain the required information to find and address the suspected problem. The City will provide a summary of at least one complaint received during the reporting period. This information will help measure the effectiveness of the reporting system, as well as the public awareness and concern regarding construction storm water issues.

Activity 6. Notify ADEM of Non-Compliant Sites

The City will notify the ADEM of any construction sites where a possible violation of the Clean Water Act has occurred. Possible violations may include, but are not limited to, releases of sediment to a water of the State or failure to initiate corrective actions following an inspection by the City.

Rainbow City continues to rely on the ADEM for construction NPDES enforcement.

Evaluation Criteria: The City will report the total number of non-compliant construction sites reported to ADEM during the reporting period.

5.4.3 Changes

Rainbow City requests no changes to the Construction Site Storm Water Runoff strategies identified in the 2012 SWMP.

5.4.4 Responsible Party

The Rainbow City Engineering Department is responsible for implementing and tracking the construction site storm water provisions of the ordinance as well as other Construction Site Storm Water Runoff strategies.

5.5 Post-Construction Storm Water Management

5.5.1 2014 to 2015 Implementation Status

During the April 1, 2014 to March 31, 2015 reporting period, Rainbow City completed four (4) of the four (4) Post-Construction Storm Water Management strategies identified in the 2012 SWMP.

A table identifying each Post-Construction Storm Water Management strategy planned for the 2014-2015 reporting period, a description of actions taken by Rainbow City, and a description of activities planned for the next reporting period is provided in **Appendix D**. Supporting documentation is also included in **Appendix D**.

5.5.2 Proposed Activities for the April 1, 2015 to March 31, 2016 Reporting Period

The City will implement the following activities as part of their Post-Construction Storm Water Management Program during the 2015-2016 reporting period. To evaluate the success of the program and aid in preparing the required Annual Report, evaluation criteria have been established for each strategy.

Activity 1. Reducing Post-Construction Runoff Volume

Section 7 of Ordinance No. 490 provides for post-construction storm water management measures to reduce runoff volume.

The ordinance will be evaluated by **December 31, 2015**. If changes are warranted, a new or revised ordinance will be approved and implemented.

Evaluation Criteria: The ordinance will be evaluated on its effectiveness in reducing runoff from new development or redevelopment. The City will report the number of submitted plans that include measures to reduce runoff volume and the number of enforcement actions taken. The evaluation may also examine which control measures are typically utilized and if additional examples should be added to the ordinance.

Activity 2. Reducing Pollutants from Development

Section 8.E of Ordinance No. 490 requires that requires that pollutants in runoff water be minimized using appropriate BMPs.

The ordinance will be evaluated by **December 31, 2015**. If changes are warranted, a new or revised ordinance will be approved and implemented.

Evaluation Criteria: The ordinance will be evaluated on its effectiveness in reducing pollutants in runoff from new development or redevelopment. The evaluation may also examine which control measures are typically utilized and if examples of appropriate control measures should be added to the ordinance. The City will report the number of developments where treatment of storm water runoff is required and the criteria for requiring treatment of storm water runoff.

Activity 3. Long-Term Maintenance of Storm Water Controls

Section 7 of Ordinance No. 490 requires long-term maintenance of storm water control structures.

The ordinance will be evaluated by **December 31, 2015**. If changes are warranted, a new or revised ordinance will be approved and implemented.

Evaluation Criteria: The ordinance will be evaluated on its effectiveness in addressing long-term maintenance of storm water controls. The City will report the number of submitted plans that include detailed maintenance procedures, the number of maintenance agreements reviewed, the number of maintenance provisions approved or denied, and the number of enforcement actions taken.

Activity 4. Evaluate Obstacles to Low Impact/Green Development

The City will review and evaluate policies and ordinances related to building codes, or other local regulations, with a goal of identifying regulatory and policy impediments to the installation of green infrastructure and low-impact development techniques.

Evaluation Criteria: The City will report if obstacles are identified and provide a brief summary on how the conflicts will be resolved.

5.5.3 Changes

Rainbow City requests no changes to the Post-Construction Storm Water Management strategies identified in the 2012 SWMP.

5.5.4 Responsible Party

The Rainbow City Engineering Department is responsible for implementing and tracking the provisions of the ordinance pertaining to post-construction storm water management.

5.6 Pollution Prevention and Good Housekeeping for Municipal Operations

5.6.1 2014 to 2015 Implementation Status

During the April 1, 2014 to March 31, 2015 reporting period, Rainbow City completed five (5) of the five (5) Pollution Prevention and Good Housekeeping for Municipal Operations strategies identified in the previous Annual Report.

Rainbow City also completed twelve (12) strategies beyond those proposed in the previous Annual Report. These strategies included:

- Heath Williamson developed a Municipal Training Manual to inform all employees of proper protocols (Activity 1a)
- Rainbow City purchased and placed a filter in fire bay #2 floor drains for vehicle washing activities (Activity 3c)
- Rainbow City provides brush pickup throughout the City (Activity 6)
- Rainbow City provides large item pickup throughout the City (Activity 7)
- Rainbow City placed and maintains “No Littering” signs within the City (Activity 8)
- Rainbow City enforces an Anti-Litter Ordinance that results in a \$500 fine (Activity 9)
- Rainbow City hired an Environmental Officer on April 14, 2014 (Activity 10)
- Rainbow City requests Etowah County provide prisoner cleanup along City, County, and State right-of-ways (Activity 11)
- During the snow and ice weather events the City uses sand, a backhoe, a scrapper, and a snow plow (Activity 12)
- Rainbow City promoted and participated in Community Clean-up Day in April 2014 as well as provided educational materials for the volunteers (Activity 13)
- Rainbow City placed absorbent material in the maintenance shop (Activity 14)
- Rainbow City removed scrap tires from the City shop (Activity 15)

A table identifying each Pollution Prevention and Good Housekeeping for Municipal Operations strategy planned for the 2014-2015 reporting period, a description of actions taken by Rainbow City, and a description of activities planned for the next reporting period is provided in **Appendix D**. Supporting documentation is also included in **Appendix D**.

5.6.2 Proposed Activities for the April 1, 2015 to March 31, 2016 Reporting Period

The City will implement the following activities as part of their Pollution Prevention and Good Housekeeping for Municipal Operations Program during the 2015-2016 reporting period. To evaluate the success of the program and aid in preparing the required Annual Report, evaluation criteria have been established for each strategy.

Activity 1. Employee Training

The City will continue to implement a training program for municipal employees that focus on pollution prevention, good housekeeping measures, identification of potential illicit discharges, and other potential threats to storm water quality. Training materials will focus on vehicle, roadway, and building maintenance; herbicides; pesticides; and street cleaning.

The next training session will be conducted by **March 31, 2016**.

Evaluation Criteria: The City will provide details on the training topics presented to municipal workers during the reporting period. The City will keep attendance records and report the number of municipal workers trained during the reporting period. This information will help measure the municipal workers awareness of storm water issues.

Activity 2. Vehicle Maintenance Program

Rainbow City owns and operates a variety of vehicles and equipment used in municipal operations and maintenance. These vehicles include passenger cars, trucks, vans, and equipment. The City will conduct routine maintenance on owned vehicles and will inspect vehicles for the presence of fluid leaks during routine maintenance. The City will promptly repair vehicles determined to have leaks.

Evaluation Criteria: The City will provide a completed inspection log for at least one vehicle used during the reporting period. The City will report the frequency of inspections and the number of vehicle or equipment leaks identified during the reporting period as a result of the inspection program. This information will help measure the effectiveness of the vehicle inspection and maintenance program.

Activity 3. Vehicle Wash Area

A specified area for vehicle washing has been established for each department. Each department location will be reviewed, inspected, and modified as needed throughout the year. During the annual BMP training, the City will notify all employees of the locations of the designated wash areas.

The City discontinued use of phosphate-containing soaps for municipal vehicle washing areas.

Evaluation Criteria: The City will report the number of designated municipal vehicle washing areas. The City will also keep attendance records and report the number of municipal workers trained during the reporting period. This information will help measure the municipal workers awareness of storm water issues.

Activity 4. Pesticide Application

Most pesticide application is performed by an outside contractor. Prior to entering into or renewing any additional contracts the City will require the contractor to provide all necessary certifications and licensing during the bid process.

The City has a Mosquito Control Program. Applications are limited to below the threshold required for NOI submittal under a NPDES ALG870000 permit. Should City applications exceed thresholds, then the City will obtain an NPDES permit from ADEM for application practices. The City will follow ADEM regulations regarding mosquito pesticide application.

To reduce potential impact to waterways, the City will review all areas where pesticides are to be used. Areas where pesticides are determine to post a threat to water quality should be noted on the storm water map and identified in the annual report.

The City will comply with pesticide application and disposal regulations.

Evaluation Criteria: The City will maintain a copy of the current certification. The City will report the number of areas where it was determined pesticides impacted waterways during the reporting period, if any, and how the impact was resolved. This information will help measure the effectiveness of the City's review.

5.6.3 Changes

Rainbow City requests no changes to the Pollution Prevention and Good Housekeeping for Municipal Operations strategies identified in the 2012 SWMP.

5.6.4 Responsible Party

Rainbow City Engineering Department is responsible for implementing and tracking Pollution Prevention and Good Housekeeping strategies within municipal operations.

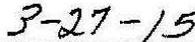
5.7 Agency Certification

This Annual Report is produced jointly by the eight jurisdictions comprising the Gadsden-Etowah Phase II Small Municipal Separate Storm Sewer System. Implementation of the minimum control measures applicable to each jurisdiction is the responsibility of the individual jurisdiction. Implementation of the storm water monitoring component of the Storm Water Management Program is a joint responsibility of all jurisdictions.

I certify under penalty of law that this document and all attachments pertaining to Rainbow City were prepared under my directions or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated 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 or imprisonment for knowing violations.



Terry John Calhoun, Mayor
Rainbow City, Alabama



Date

6. REECE CITY

Reece City encompasses approximately 0.4% of the Urbanized Area and accounts for approximately 0.2% of the population.

On August 27, 2013, the Town of Reece City submitted a letter to the ADEM requesting that MS4 requirements be waived for the town in accordance with Part 122.33(b) of Title 40 of the Code of Federal Regulations. On March 13, 2014, the ADEM issued a letter to Reece City waiving the requirements of the MS4 Phase II permit and removing the town from the small MS4 program (See **Appendix E**).

7. CITY OF SOUTHSIDE

The City of Southside encompasses 13.4% of the Urbanized Area and accounts for 10% of the population.

In accordance with Part III.B of the NPDES General Permit, the 2012 Storm Water Management Program detailed the specific activities the City of Southside planned to undertake regarding the following six minimum control measures:

1. Public Education and Outreach on Storm Water Impacts
2. Public Involvement/Participation
3. Illicit Discharge Detection and Elimination (IDDE)
4. Construction Site Storm Water Runoff Control
5. Post-Construction Storm Water Management in New Development and Redevelopment
6. Pollution Prevention/Good Housekeeping for Municipal Operations

The following sections detail the current implementation status of each minimum control measure, activities conducted during the current reporting period, planned activities for the upcoming reporting period, requested changes to the provisions of the 2012 SWMP, and the party responsible for implementing each minimum control measure.

7.1 Public Education and Outreach

7.1.1 2014 to 2015 Implementation Status

During the April 1, 2014 to March 31, 2015 reporting period, the City of Southside completed ten (10) of the ten (10) Public Education and Outreach strategies identified in the previous Annual Report.

The City of Southside also completed three (3) strategies beyond those proposed in the previous Annual Report. These strategies included:

- The City of Southside placed bookmarks in the library and educational materials in the community center (Activity 12)
- The City of Southside displayed educational signs in the City Hall (Activity 13)
- The City of Southside used digital signs to advertise events (Activity 14)
- The City of Southside visited subdivisions and HOAs to hand out educational materials and discuss storm water impacts, ways to keep their neighborhoods clean, and how to report questionable discharges (Activity 15)
- The City Revenue Officer hand delivered the planned dates of the City Cleanup Day to businesses and the high school football coach (Activity 16)
- The City of Southside maintains three “No Dumping” signs within the City (Activity 17)
- The City maintains approx. 20 "No Littering" Signs within the City (Activity 18)
- The City of Southside educates the public through council meetings (Activity 19)

A table identifying each Public Education and Outreach strategy planned for the 2014-2015 reporting period, a description of actions taken by the City of Southside, and a description of activities planned for the next reporting period is provided in **Appendix F**. Supporting documentation is also included in **Appendix F**.

7.1.2 Proposed Activities for the April 1, 2015 to March 31, 2016 Reporting Period

The City will implement the following activities as part of their Public Education and Outreach Program during the 2015-2016 reporting period. To evaluate the success of the program and aid in preparing the required Annual Report, evaluation criteria have been established for each strategy.

Activity 1. Distribute Storm Water Educational Material

The City will develop and distribute education materials to approximately 2,800 households and businesses. The materials will be distributed through inclusion in water and garbage collection bills or provided as an advertisement in the Gadsden Times. These materials will be distributed once per year and will:

- Introduce the MS4 to the general public and discuss the storm water cycle and how common contaminants enter the storm water system.
- Educate households and businesses about proper and improper use, storage, and disposal of common household chemicals such as herbicides, pesticides, and fertilizers.
- Make the public aware of how the improper use of these chemicals can impact storm water quality.
- Discuss how the cumulative effect of these contaminants impact the Coosa River and what individual households and businesses can do to reduce storm water pollutants.
- Provide information on additional resources pertaining to storm water, storm water pollution, and Neely Henry Lake TMDLs.
- Provide information on storm water contacts within the City of Southside and information on reporting potential storm water violations.

Evaluation Criteria: The City will report the number of households who receive the mail-out during the reporting period or the number of Gadsden Times subscribers. This information will indicate the number of people who received educational materials.

Activity 2. Maintain the Storm Water Web Page

The City will regularly update the Storm Water webpage on the City of Southside website that was developed during the 2013-2014 reporting period. Participation will be tracked through the number of “hits” on the webpage for the reporting period. The webpage will:

- Include general information on the Gadsden-Etowah MS4;
- Discuss the storm water cycle and how common contaminants enter the storm water system;
- Provide links to related storm water resources;
- Provide contact information to report illicit discharges;
- Provide a calendar of upcoming community events related to storm water outreach.

Evaluation Criteria: The City will report what information was added to the webpage and the number of “hits” on the webpage. The City has an additional target of **1,000 contacts** for the reporting period. This information will indicate the number of people who view the webpage and the associated educational materials.

Activity 3. Maintain Facebook Page

The City will update the City of Southside Stormwater Management Facebook page to promote upcoming events and provide links to educational information to the public.

Evaluation Criteria: The City will report what information was added to the Facebook page and the number of “followers”. This information will indicate the number of people who view the Facebook page and the associated educational materials.

Activity 4. Staff a Display at City Fest

The City will provide storm water outreach material and/or staff a display during the annual City Fest event scheduled for **July 2015**. Pre-printed outreach material and/or displays may include:

- Introduction to the MS4 and the General Permit requirements
- Discussion of the storm water cycle and how common contaminants enter the storm water system
- Information on proper and improper use, storage, and disposal of common household chemicals
- Information regarding the Neely Henry Lake TMDLs
- Storm water contacts within the City of Southside and information on reporting potential storm water violations.

Evaluation Criteria: The City will report the number of educational material distributed at the event and the estimated number of people that stopped by the booth. This information will indicate the number of people who received

educational materials.

Activity 5. Partnerships in Educational and Public Involvement Events

The City will partner with Keep Etowah Beautiful, the Middle Coosa Watershed Project, and/or Alabama Power to distribute storm water educational material and promote events such as *Renew Our Rivers Message in a Bottle*, *Farm City*, and/or community cleanup days. Promotion methods may include co-sponsoring radio, television, and/or print advertisement with co-permittees and other stakeholders. City personnel will participate in the events.

Evaluation Criteria: The City will report number of participants who received educational materials during the events and the ways in which the City promoted and/or advertised the events. This information will indicate the number of people who received educational materials and will help measure the public awareness of the events and degree of public participation.

Activity 6. Promote Water Quality Awareness Week

The City will promote the 2015 *Water Quality Awareness Week* through City resources including co-sponsoring radio, television, and print advertisement with co-permittees and other stakeholders.

Evaluation Criteria: The City will report activities associated with this event and the ways in which the City promoted / advertised *Water Quality Awareness Week*. This information will help measure the public awareness of the event and degree of public and City participation.

Activity 7. Promote and Participate in the Etowah County Water Festival

The City will promote and participate in the annual *Etowah County Water Festival* through City resources. Promotion methods may include co-sponsoring radio, television, and/or print advertisement with co-permittees and other stakeholders. City personnel will participate in the festival.

Evaluation Criteria: The City will report number of City volunteers at the event and the ways in which the City promoted and/or advertised the event. This information will indicate the City's participation and will help measure the public awareness of the event and degree of public and City participation.

Activity 8. Provide Information on Construction Site Storm Water Impacts

The City will provide pre-printed educational information on how construction site runoff can impact storm water quality to individuals requesting plan review and building/development permits.

Evaluation Criteria: The City will report the number of permits issued during the reporting period. This information will indicate the number of people who received educational materials.

Activity 9. Provide Information on Low Impact/Green Development

The City will provide educational information on green development to individuals requesting plan review and building/development permits. Information may include references to additional resources such as the Green Building Alliance, Low Impact Development Center, and U.S. Department of Housing and Urban Development.

The City will encourage developers and engineers to consider green infrastructure alternatives during the plan review process.

Evaluation Criteria: The City will report the number of permits issued and number of projects that incorporate these techniques during the reporting period. This information will indicate the number of people who received educational materials.

Activity 10. Gadsden-Etowah MS4 Steering Committee Meetings

The City will coordinate and/or participate in quarterly meetings of the Stormwater Steering Committee for entity updates, networking, and coordination of activities and BMP strategies.

Evaluation Criteria: The City will provide meeting agendas during the reporting period. The City will keep attendance records. This information will indicate the participation of the steering committee and their interest in networking and coordination of activities.

7.1.3 Changes

The City of Southside requests no changes to the Public Involvement and Participation strategies identified in the 2012 SWMP.

7.1.4 Responsible Party

City of Southside is responsible for overseeing, developing, and coordinating the Public Education and Outreach efforts.

7.2 Public Involvement and Participation

7.2.1 2014 to 2015 Implementation Status

During the April 1, 2014 to March 31, 2015 reporting period, the City of Southside completed seven (7) of the eight (8) Public Involvement and Participation strategies identified in the previous Annual Report and began working on the remaining one (1) strategy.

The City of Southside along with the Gadsden-Etowah Steering Committee scheduled a Second Annual MS4 Conference again February 25, 2015; however due to inclement weather forecast the conference was postponed two days before the conference. The County received 8 inches of snow that day. The Conference has been rescheduled for April 15, 2015 (Activity 1).

The City of Southside also completed seven (7) strategies beyond those proposed in the previous Annual Report. These strategies included:

- Mr. Jimmy Whittemore and Mr. Daryl Sanders attended the ADEM "Nonpoint Source Conference" (Activity 9)
- The City of Southside recycles aluminum cans in the break room of the City Hall (Activity 10)
- The City of Southside recycles metal from City projects (Activity 11)
- The City of Southside collects used oil at the maintenance shop for recycling (Activity 12)
- The City of Southside advertises the Gadsden Recycling Center on their webpage (Activity 13)
- The City of Southside visited subdivisions and HOAs to hand out educational materials and discuss storm water impacts, ways to keep their neighborhoods clean, and how to report questionable discharges (Activity 14)
- The City has a Nuisance and Abatement Ordinance and an enforcement officer to investigate complaints of abandoned property, trash, debris, abandoned vehicles, unkept lawns, etc. (Activity 15)

A table identifying each Public Involvement and Participation strategy planned for the 2014-2015 reporting period, a description of actions taken by the City of Southside, and a description of activities planned for the next reporting period is provided in **Appendix F**. Supporting documentation is also included in **Appendix F**.

7.2.2 Proposed Activities for the April 1, 2015 to March 31, 2016 Reporting Period

The City will implement the following activities as part of their Public Involvement and Participation Program during the 2015-2016 reporting period. To evaluate the success of the program and aid in preparing the required Annual Report, evaluation criteria have been established for each strategy.

Activity 1. Storm Water Conference/Public Meeting

The City will develop and coordinate an annual Storm Water Conference/Public Meeting for local businesses and residents. The second annual MS4 conference is currently scheduled for April 15, 2015. The City will develop and coordinate a third annual MS4 conference in 2015 or 2016.

This will be a joint outreach effort with all co-permittees participating. The agenda may include general information on the Gadsden-Etowah MS4, presentations pertaining to how common contaminants enter the storm water system, and presentations by key stakeholders such as the ADEM, Natural Resources and Conservation Service, and Clean Water Partnership. The purpose of the conference/meeting will be to encourage public participation and input into the storm water management program.

Evaluation Criteria: The City will report the number of conference attendees and provide a copy of the agenda to demonstrate the focus of the conference. This information will help measure the degree of public education and involvement.

Activity 2. Partnerships in Educational and Public Involvement Events

The City will participate in and promote annual programs associated with the Coosa Basin Clean Water Partnership, Keep Etowah Beautiful, the Middle Coosa Watershed Project, and/or Alabama Power such as *Renew Our Rivers*, *Message in a Bottle*, and/or community cleanup days. Promotion methods may include co-sponsoring radio, television, and/or print advertisement with co-permittees and other stakeholders. City personnel will participate in the events.

Evaluation Criteria: The City will report number of City volunteers at the events and the ways in which the City promoted and/or advertised the event. This information will help measure the public awareness of the event and degree of public and City participation.

Activity 3. Promote and Participate in Renew Our Rivers

The City will participate in and promote the *Renew Our Rivers* program in the **November of 2015**. Promotion methods may include co-sponsoring radio, television, and/or print advertisement with co-permittees and other stakeholders. City personnel will participate in the event.

Evaluation Criteria: The City will report the number of City volunteers at the event and the ways in which the City promoted and/or advertised the event. This information will indicate the number of people who received educational materials and will help measure the public awareness of the event and degree of public participation.

Activity 4. Coordinate and Promote an Annual Community Cleanup Day

In addition to the *Renew our Rivers* program, the City will coordinate and promote an annual community cleanup day targeting secondary waterways and primary contributing watersheds. Promotion methods may include co-sponsoring radio, television, and/or print advertisement with co-permittees and other stakeholders. City personnel will participate in the event.

Evaluation Criteria: The City will report number of volunteers and the ways in which the event was promoted and/or advertised. This information will indicate the number of people who received educational materials and will help measure the public awareness of the event and degree of public participation.

Activity 5. Promote and Participate in the Etowah County Water Festival

The City will promote and participate in the annual *Etowah County Water Festival* through City resources. Promotion methods may include co-sponsoring radio, television, and/or print advertisement with co-permittees and other stakeholders. Promotion methods may include co-sponsoring radio, television, and/or print advertisement with co-permittees and other stakeholders. City personnel will participate in the festival.

Evaluation Criteria: The City will report the number of City volunteers at the event and the ways in which the City promoted and/or advertised the event. This information will indicate the City’s participation and will help measure the public awareness of the event and degree of public and City participation.

Activity 6. Maintain Facebook Page

The City will update the City of Southside Stormwater Management Facebook page to promote upcoming events and provide links to educational information to the public.

Evaluation Criteria: The City will report what information was added to the Facebook page and the number of “followers”. This information will indicate the number of people who view the Facebook page and the associated educational materials.

Activity 7. Public Reporting and Tracking System

The City currently provides a contact number for Jimmy Whittemore on the Storm Water web page for members of the public to report non-compliant construction sites, illicit discharges (including spills or illegal dumping), impaired waterways, and violations of ordinances relating to storm water pollution. The City will evaluate the current public reporting and tracking methods.

The City will continue to track received complaints and the City's responses to the received complaints.

Evaluation Criteria: The City will report the total number of complaints received, the number of complaints addressed, and the number of complaints resolved during the reporting period. The City will also report whether or not the received reports contain the required information to find and address the suspected problem. The City will provide a summary of at least one complaint received during the reporting period. This information will help measure the effectiveness of the reporting system, as well as the public awareness and concern of storm water issues.

Activity 8. Evaluate Comment and Feedback Methods

The City currently provides a contact number on the Storm Water web page for members of the public to provide comments on the MS4 program, feedback on the public outreach efforts, and suggestions for improvement to the program. The City also maintains a Stormwater Management Facebook page where the public can comment. The City will evaluate the current comment and feedback methods.

Evaluation Criteria: The City will report the total number of comments received from the public.

7.2.3 Changes

The City of Southside requests no changes to the Public Involvement and Participation strategies identified in the 2012 SWMP.

7.2.4 Responsible Party

The City of Southside is responsible for overseeing, developing, and coordinating the Public Involvement and Participation efforts.

7.3 Illicit Discharge Detection and Elimination

7.3.1 2014 to 2015 Implementation Status

During the April 1, 2014 to March 31, 2015 reporting period, the City of Southside completed seventeen (17) of the seventeen (17) Illicit Discharge Detection and Elimination strategies identified in the previous Annual Report.

The City of Southside also completed one (1) strategy beyond those proposed in the previous Annual Report. The strategy was:

- Mr. Jimmy Whittemore and Mr. Daryl Sanders attended the ADEM "Nonpoint Source Conference" (Activity 18).

A table identifying each Illicit Discharge Detection and Elimination strategy planned for the 2014-2015 reporting period, a description of actions taken by the City of Southside, and a description of activities planned for the next reporting period is provided in **Appendix F**. Supporting documentation is also included in **Appendix F**.

7.3.2 Proposed Activities for the April 1, 2015 to March 31, 2016 Reporting Period

The City will implement the following activities as part of their Illicit Discharge Detection and Elimination Program during the 2015-2016 reporting period. To evaluate the success of the program and aid in preparing the required Annual Report, evaluation criteria have been established for each strategy.

Identifying Priority Areas

Activity 1. Identify Priority Areas

The City delineated drainage basins in the 2014-2015 reporting period. The City will then re-evaluate the drainage basins by **April 30, 2015** to determine the Priority Areas for the 2015-2016 reporting period. Priority Areas will be identified using the illicit discharge potential (IDP) calculation procedures detailed in Section 3 of the IDDE Program. The City will maintain records of the IDP calculations for each drainage basin.

Evaluation Criteria: The City will report the total IDP score for each drainage basin and will provide an updated map showing the identified Priority Areas. The City will report drainage basins that are newly listed or de-listed from the previous reporting year's calculations.

Field Assessment Activities

Activity 2. Outfall Identification

The City will implement a stream-walking program designed to identify previously unknown outfalls to the MS4. The City also plans to map a portion of the waterbodies that receive discharge from the MS4 during the reporting period. The implementation process is detailed in Section 4 of the IDDE Program.

Evaluation Criteria: The City will maintain records of field observations. The City will report the number of outfalls identified and the stream length walked during the reporting period. The City will provide updated tables and maps that include the outfalls identified by the stream-walking program.

Activity 3. Probable Outfall Verification

Probable outfalls may be identified during mapping activities, during review of proposed development plans, or through illicit discharge reports. When a probable outfall is identified, it will be added to the Storm Water System Map and labeled as unverified.

The City will verify probable outfalls through field observation within 18 months of their addition to the Storm Water System Map. The implementation process is detailed in Section 4 of the IDDE Program.

Evaluation Criteria: The City will report the number of probable outfalls that were identified and the number of outfalls that were verified during the reporting period. The City will provide updated tables and maps that include the verified outfalls, as well as probable outfalls that are planned to be verified in the following reporting period. The City will maintain records of field observations.

Activity 4. Outfall Reconnaissance Inventory

During the reporting period, the City or subcontracted crews will conduct dry weather monitoring of major outfalls in Priority Areas. The City will also inspect a portion of the outfalls located outside Priority Areas. The implementation process is detailed in Section 7 of the IDDE Program.

Evaluation Criteria: The City will maintain records of field observations. The City will report the number of outfalls inspected during the reporting period. The City will also provide a summary of the results of outfall reconnaissance inventory activities conducted during the reporting period.

Activity 5. Suspect Discharge Sampling

If a dry weather flow has a severity index of 3 on one or more indicators in Section 4 of the Outfall Reconnaissance Inventory Field Sheet, or if field screening indicates a suspect discharge, field crews will collect samples for further analysis. The implementation process is detailed in Section 7 of the IDDE Program.

Evaluation Criteria: The City will report the number of identified dry weather flows, suspect discharges, and samples collected during the reporting period. The City will report the analysis results for the collected samples. The City will report if the suspect discharge was confirmed to be an illicit discharge and, if known, the type of illicit discharge.

IDDE Investigation

Activity 6. Outfall Ranking

Data from each Outfall Reconnaissance Inventory Field Sheet will be analyzed to characterize the observed outfall as having obvious, suspect, possible, or unlikely discharge potential. Obvious and suspect illicit discharges will be investigated within 10 and 30 days, respectively. Potential illicit discharges will be investigated within 60 days. The implementation process is detailed in Section 7 of the IDDE Program.

Evaluation Criteria: The City will report the ranking of each outfall inspected during the reporting period. The City will report the number of outfalls that required further investigation.

Activity 7. Discharge Investigation

Illicit discharge investigations will be performed to determine the source of a discharge problem. The implementation process is detailed in Section 7 of the IDDE Program.

Evaluation Criteria: The City will report the number of illicit discharge investigations performed during the reporting period. The City will also report the number of confirmed illicit discharges, if a source was determined, and if the discharge was eliminated.

Corrective Action Record Keeping

Activity 8. Corrective Action Record Keeping

When a suspect illicit discharge or illicit connection is identified, a case log detailing pertinent information will be created. Throughout the problem investigation and corrective action activities, all information related to the incident or property in question will be documented in the case log.

Evaluation Criteria: The City will maintain records of the correction actions. The City will report the number of confirmed illicit discharges and the number of illicit discharges corrected or eliminated during the reporting period. The City will also report the number of confirmed illicit discharges where corrective action is pending.

Storm Water System Mapping

Activity 9. Update Storm Water System Map – Existing Features

The City of Southside will continue to expand the existing Storm Water System Map to include:

- The location of all outfalls (to include latitude and longitude) and the names and location of all waters of the State that receive discharges from those outfalls;
- Structural BMPs owned, operated, and maintained within the City limits;
- An update of known connections to the MS4 authorized or allowed by the City;
- Geographic areas which may discharge storm water into the MS4, which may not be located within the municipal boundary;
- Identification and location of waterways within the City including detention ponds, streams, and ditches.

Evaluation Criteria: The City will provide an updated Storm Water System Map showing the features added during the reporting period.

Activity 10. Update Storm Water System Map – Future Additions

Proposed additions within the City, including new storm sewer and drainage ditches, will be mapped based on the civil plans provided to the City or digitized by the City. Outfalls from proposed development will be verified after construction is complete, as part of Activity 3. The implementation process is further discussed in Section 5 of the IDDE Program.

Evaluation Criteria: The City will report the number of civil plans provided to the City and the number of verified new features or outfalls during the reporting period. The City will provide an updated Storm Water System Map showing the features added during the reporting period.

Illicit Discharge Ordinance

Activity 11. Evaluate IDDE Ordinance

Ordinance No. O-10-2012, Section VIII currently regulates Illicit Discharge enforcement. The City of Southside will evaluate the effectiveness of Ordinance No. O-10-2012, Section VIII by **December 31, 2015**. If updates are required, the City will amend the existing ordinance or prepare a new ordinance.

Evaluation Criteria: The ordinance will be evaluated on its effectiveness in addressing identified illicit discharges and preventing repeat offenders. The City will report the number of complaints received, number of illicit discharges

identified during the reporting period, the number of resolved violations, the number of repeat offenders, and the number of enforcement actions taken.

IDDE Public Education

Activity 12. Distribute Storm Water Educational Material

The City will develop and distribute educational materials highlighting identification and reporting of potential illicit discharges using the Storm Water web page, the City of Southside Stormwater Management Facebook page, and hardcopy distribution at events.

Evaluation Criteria: The City will report ways in which the City provided educational materials to the public. The City will report the number of distributed educational material at the event and an estimated number of people that stopped by the booth. The City will report what information was added to the webpage and the number of “followers” on the webpage. This information will indicate the number of people who received educational materials.

Activity 13. Public Reporting and Tracking System

The City currently provides a contact number for Jimmy Whittemore on the Storm Water illicit discharge web page for members of the public to report illicit discharges (including spills or illegal dumping), impaired waterways, and violations of the illicit discharge ordinance. The City will evaluate the current public reporting and tracking methods.

The City will continue to track received complaints and the City’s responses to the received complaints.

Evaluation Criteria: The City will report the total number of complaints received, the number of complaints addressed, and the number of complaints resolved during the reporting period. The City will also report whether or not the received reports contain the required information to find and address the suspected problem. The City will provide a summary of at least one complaint received during the reporting period. This information will help measure the effectiveness of the reporting system, as well as the public awareness and concern of storm water issues.

Activity 14. Municipal Training

Municipal workers will be trained in the identification of illicit discharges as well as the prevention of storm water pollution at municipal facilities or related to municipal activities. Specific municipal operations such as fueling, vehicle maintenance, vehicle washing, paint and paint waste storage and disposal, and

used oil disposal may be addressed. The next training session will be conducted by **March 31, 2016**.

Municipal workers will be notified of the procedures for reporting suspected illicit discharges to Jimmy Whittemore, the City IDDE Program Manager, including the preferred method of contact (email) and the information to be included in the report (e.g., location, date, time, observations).

Evaluation Criteria: The City will provide details on the training topics presented to the municipal workers. The City will maintain attendance records and report the number of municipal workers trained during the reporting period. This information will help measure the municipal workers awareness of illicit discharges and storm water issues.

Storm Water Monitoring

Activity 15. Storm Water Monitoring Locations

Storm water monitoring locations were identified in the 2012 SWMP and were revised in January 2014. The City updated the existing Storm Water System Map to include these locations.

If additional storm water monitoring points are recommended as a result of the analysis of the monitoring data, the City will update the map with the revised or additional locations.

Evaluation Criteria: The City will provide an updated Storm Water System Map showing the features added during the reporting period.

Activity 16. Evaluation of Monitoring Data

In conjunction with the monitoring provisions of Section 2.2 of the SWMP, the City of Southside will evaluate the collected monitoring data for indicators of potential illicit discharges within the City and to assess the effectiveness of the BMPs in achieving the 2008 TMDL.

Evaluation Criteria: The City will report which monitoring points appear to have relatively higher pollutant loads. The City will make recommendations to the Gadsden-Etowah MS4 Storm Water Steering Committee to add and/or modify monitoring points to better characterize discharges from the MS4.

NPDES Industrial Permitting

Activity 17. As authorized by the Clean Water Act, the NPDES Permit program controls water

pollution by regulating point sources that discharge pollutants into waters of the United States. Title 40, Part 122 of the Code of Federal Regulations (40CFR122) specifies that discharges associated with certain industrial activities must obtain an NPDES permit. The ADEM currently provides for individual and general NPDES permitting.

Information pertaining to permitted facilities will be obtained from available public sources such as MYWATERS Mapping, EPA ECHO Database, and ADEM E-file and incorporated into the Storm Water System Map. This information will be used in conjunction with the storm water system mapping and monitoring data to evaluate potential sources of storm water pollution and to identify unpermitted facilities.

Unpermitted facilities that require an NPDES permit will be reported to the Industrial Section of the ADEM. The City of Southside continues to rely on the ADEM for industrial NPDES permitting and enforcement.

Evaluation Criteria: The City will provide the number of permitted facilities reported to ADEM during the reporting period, if any. This information will help measure the effectiveness of the land use evaluations.

7.3.3 Changes

The City of Southside requests no changes to the Illicit Discharge Detection and Elimination strategies identified in the 2012 SWMP.

7.3.4 Responsible Party

The City of Southside Building Department is responsible for overseeing, developing, coordinating, and enforcing the IDDE program within the regulated City of Southside MS4 area.

7.4 Construction Site Storm Water Runoff

7.4.1 2014 to 2015 Implementation Status

During the April 1, 2014 to March 31, 2015 reporting period, the City of Southside completed six (6) of the six (6) Construction Site Storm Water Runoff strategies identified in the previous Annual Report.

A table identifying each Construction Site Storm Water Runoff strategy planned for the 2014-2015 reporting period, a description of actions taken by the City of Southside, and a description of activities planned for the next reporting period is provided in **Appendix F**. Supporting documentation is also included in **Appendix F**.

7.4.2 Proposed Activities for the April 1, 2015 to March 31, 2016 Reporting Period

The City will implement the following activities as part of their Construction Site Storm Water Runoff Program during the 2015-2016 reporting period. To evaluate the success of the program and aid in preparing the required Annual Report, evaluation criteria have been established for each strategy.

Activity 1. Erosion and Sediment Control Ordinance

Ordinance No. O-10-2012 was adopted on December 10, 2012 with an effective date of December 15, 2012 and replaces the previous zoning ordinance. The new ordinance currently governs storm water management within the city, to include construction site runoff.

The City will evaluate the effectiveness of the Ordinance by **December 31, 2015**. If changes are warranted, a new or revised ordinance will be approved and implemented.

Evaluation Criteria: The ordinance will be evaluated on its effectiveness in addressing erosion and sediment control. The City will report the number of non-compliant construction sites identified by the City, the number of enforcement actions taken, the number of non-compliant sites reported to the ADEM, and whether the individuals or businesses responsible for identified non-compliant construction sites are repeat offenders.

Activity 2. Construction Site Inspection Program

Designated City personnel will inspect all qualifying construction sites within 60 days of initial disturbance, at periodic intervals during construction, and following stabilization. Ordinance No. O-10-2012 provides for periodic inspections of construction sites at the discretion of the Enforcement Officer or City Engineer.

The City will evaluate the effectiveness of the construction site inspection program by **December 31, 2015**.

Evaluation Criteria: The City will report the number of inspections completed, the number of non-compliant construction sites identified by the City, the number of enforcement actions taken, the number of non-compliant sites reported to the ADEM, and whether the individuals or business responsible for identified non-compliant construction sites are repeat offenders. The City will also provide a summary of at least one inspection conducted during the reporting period that resulted in enforcement actions.

Activity 3. Sediment and Erosion Control Plan Review

Section III(4)(b) of Ordinance No. O-10-2012 requires that each application for a Land Disturbance Permit be accompanied by a Sediment and Erosion Control

Plan and a Stormwater Management Plan providing for storm water management during the land disturbing activity and after the activity has been completed. The plans will be reviewed as part of the permit approval process.

Plan review will ensure proposed projects adequately address the City's erosion, sediment, and pollution control requirements. Plan review will also take into consideration what potential impacts to water quality the project may have.

Evaluation Criteria: The City will report the total number of plans reviewed, the number of plans approved or rejected during the reporting period, and number of plans that meet the requirements the Alabama Construction General Permit.

Activity 4. BMP Training Program

City personnel tasked with plan review and/or conducting BMP inspections will undergo annual training on proper design, installation, inspection, and maintenance of on-site control measures and on new technology and practices. All inspectors will complete initial storm water awareness training and attend annual refreshers.

Three employees attained Qualified Credentialed Inspector (QCI) certification in 2012. QCI certification will be maintained through the approved annual refresher courses. These 3 employees will attend a 4-hour QCI continuing education course in **June 2015**.

Evaluation Criteria: The City will provide a copy of the QCI certificates and records of awareness training received during the reporting period.

Activity 5. Public Reporting and Tracking

The City currently provides a contact number on the Storm Water web page for members of the public to report non-compliant construction sites. The City will evaluate the current public reporting and tracking methods.

The City will continue to track received complaints and the City's responses to the received complaints.

Evaluation Criteria: The City will report the total number of complaints received, the number of addressed complaints, and the number of resolved complaints during the reporting period. The City will also report whether or not the received reports contain the required information to find and address the suspected problem. The City will provide a summary of at least one complaint received during the reporting period. This information will help measure the

effectiveness of the reporting system, as well as the public awareness and concern regarding construction storm water issues.

Activity 6. Notify ADEM of Non-Compliant Sites

The City will notify the ADEM of any construction sites where a possible violation of the Clean Water Act has occurred. Possible violations may include, but are not limited to, releases of sediment to a water of the State or failure to initiate corrective actions following an inspection by the City.

The City of Southside continues to rely on the ADEM for construction NPDES enforcement.

Evaluation Criteria: The City will report the total number of non-compliant construction sites reported to ADEM during the reporting period.

7.4.3 Changes

The City of Southside requests no changes to the Construction Site Storm Water Runoff strategies identified in the 2012 SWMP.

7.4.4 Responsible Party

The City of Southside is responsible implementing and tracking the construction site storm water provisions of the ordinance as well as other Construction Site Storm Water Runoff strategies.

7.5 Post-Construction Storm Water Management

7.5.1 2014 to 2015 Implementation Status

During the April 1, 2014 to March 31, 2015 reporting period, the City of Southside completed three (3) of the four (4) Post-Construction Storm Water Management strategies identified in the previous Annual Report and began working on one (1) strategy.

The City Storm Water Manager had a discussion with the Planning Commission on March 10 the subject of revising the regulations to require green infrastructure; however revisions were not made during this reporting period (Activity 4)

The City of Southside also completed one (1) strategy beyond those proposed in the previous Annual Report. The strategy was:

- The City of Southside maintenance crew built a detention pond, with the guidance of Skipper Engineering, to alleviate occasional flooding of Powell St. & pooling around a residential structural (Activity 5)

A table identifying each Post-Construction Storm Water Management strategy planned for the 2014-2015 reporting period, a description of actions taken by the City of Southside, and a

description of activities planned for the next reporting period is provided in **Appendix F**. Supporting documentation is also included in **Appendix F**.

7.5.2 Proposed Activities for the April 1, 2015 to March 31, 2016 Reporting Period

The City will implement the following activities as part of their Post-Construction Storm Water Management Program during the 2015-2016 reporting period. To evaluate the success of the program and aid in preparing the required Annual Report, evaluation criteria have been established for each strategy.

Activity 1. Reducing Post-Construction Runoff Volume

Ordinance No. O-10-2012, Section VI provides for post-construction storm water management measures to reduce runoff volume. Specifically, all sites are required to have at least 10% vegetated area, and re-vegetated areas are required to have a minimum 75% survival of the cover crop for one year.

The ordinance will be evaluated by **December 31, 2015**. If changes are warranted, a new or revised ordinance will be approved and implemented.

Evaluation Criteria: The ordinance will be evaluated on its effectiveness in reducing runoff from new development or redevelopment. The City will report the number of submitted plans that include measures to reduce runoff volume and the number of enforcement actions taken. The evaluation may also examine which control measures are typically utilized and if additional examples should be added to the ordinance.

Activity 2. Reducing Pollutants from Development

Ordinance No. O-10-2012 requires that storm water runoff be controlled to prevent pollution of local waters and provides a list of possible control measures.

The ordinance will be evaluated by **December 31, 2015**. If changes are warranted, a new or revised ordinance will be approved and implemented.

Evaluation Criteria: The ordinance will be evaluated on its effectiveness in reducing pollutants in runoff from new development or redevelopment. The evaluation may also examine which control measures are typically utilized and if examples of appropriate control measures should be added to the ordinance. The City will report the number of developments where treatment of storm water runoff is required and the criteria for requiring treatment of storm water runoff.

Activity 3. Long-Term Maintenance of Storm Water Controls

Ordinance No. O-10-2012 requires long-term maintenance of storm water control structures and provides for the City to require inspection, funding, and planning

for permanent storm water management structures. The ordinance also requires that the design and planning of all storm water management facilities include detailed maintenance and repair procedures.

The ordinance will be evaluated by **December 31, 2015**. If changes are warranted, a new or revised ordinance will be approved and implemented.

Evaluation Criteria: The ordinance will be evaluated on its effectiveness in addressing long-term maintenance of storm water controls. The City will report the number of submitted plans that include detailed maintenance procedures, the number of maintenance agreements reviewed, the number of maintenance provisions approved or denied, and the number of enforcement actions taken.

Activity 4. Evaluate Obstacles to Low Impact/Green Development

The City will review and evaluate policies and ordinances related to building codes, or other local regulations, with a goal of identifying regulatory and policy impediments to the installation of green infrastructure and low-impact development techniques.

Evaluation Criteria: The City will report if obstacles are identified and provide a brief summary on how the conflicts will be resolved.

7.5.3 Changes

The City of Southside requests no changes to the Post-Construction Storm Water Runoff strategies identified in the 2012 SWMP.

7.5.4 Responsible Party

The City of Southside Building Department is responsible for implementing and tracking the post construction site storm water provisions of the ordinance.

7.6 Pollution Prevention and Good Housekeeping for Municipal Operations

7.6.1 2014 to 2015 Implementation Status

During the April 1, 2014 to March 31, 2015 reporting period, the City of Southside completed five (5) of the five (5) Pollution Prevention and Good Housekeeping for Municipal Operations strategies identified in the previous Annual Report.

The City of Southside also completed eleven (11) strategies beyond those proposed in the previous Annual Report. These strategies included:

- Four employees received chemical spill training (Activity 6)
- The City placed materials to respond to spills at the maintenance shop (Activity 7)

- The City of Southside provides large-item trash pick-up (Activity 8)
- The City recycles aluminum cans in the break room at the City Hall (Activity 9)
- The City recycles metal from city projects (Activity 10)
- The City collects used oil at the Maintenance Shop for recycling (Activity 11)
- The City advertises the Gadsden Recycling Center on the webpage (Activity 12)
- The County has and will provide prisoner cleanup along City, County, and State right-of-ways upon request (Activity 13)
- New Containment Facilities for Used Oil & Off Road Diesel Storage Tanks (Activity 14)
- The City has a Nuisance and Abatement Ordinance and an enforcement officer to investigate complaints of abandoned property, trash, debris, abandoned vehicles, unkept lawns, etc. (Activity 15)

A table identifying each Pollution Prevention and Good Housekeeping for Municipal Operations strategy planned for the 2014-2015 reporting period, a description of actions taken by the City of Southside, and a description of activities planned for the next reporting period is provided in **Appendix F**. Supporting documentation is also included in **Appendix F**.

7.6.2 Proposed Activities for the April 1, 2015 to March 31, 2016 Reporting Period

The City will implement the following activities as part of their Pollution Prevention and Good Housekeeping for Municipal Operations Program during the 2015-2016 reporting period. To evaluate the success of the program and aid in preparing the required Annual Report, evaluation criteria have been established for each strategy.

Activity 1. Employee Training

The City will continue to implement a training program for municipal employees that focus on pollution prevention, good housekeeping measures, identification of potential illicit discharges, and other potential threats to storm water quality. Training materials will focus on vehicle maintenance, right-of-way maintenance, and identification and reporting of potential illicit discharges.

The next training session will be conducted by **March 31, 2016**.

Evaluation Criteria: The City will provide details on the training topics presented to municipal workers during the reporting period. The City will keep attendance records and report the number of municipal workers trained during the reporting period. This information will help measure the municipal workers awareness of storm water issues.

Activity 2. Vehicle Maintenance Program

The City of Southside owns and operates a variety of vehicles and equipment used in municipal operations and maintenance, including passenger cars, trucks,

vans, and equipment. The City will continue to perform monthly inspections of City vehicles and equipment. The City will also continue to conduct routine maintenance of owned vehicles and will inspect vehicles for the presence of fluid leaks during routine maintenance on a monthly basis. The City will promptly repair vehicles determined to have leaks.

Evaluation Criteria: The City will provide a completed inspection log for at least one vehicle used during the reporting period. The City will report the frequency of inspections and the number of vehicle or equipment leaks identified during the reporting period as a result of the inspection program. This information will help measure the effectiveness of the vehicle inspection and maintenance program.

Activity 3. Vehicle Wash Areas

Vehicle washing will be performed only in designated areas. Each location will be reviewed, inspected, and modified as needed throughout the year. During the annual BMP training, the City will notify all employees of the locations of the designated wash areas.

The City discontinued use of phosphate-containing soaps at the Fire Department bay area. Where possible, the City will continue to discontinue use of phosphate-containing soaps for vehicle washing (unless washing takes place at an NPDES-permitted facility), and will incorporate non-phosphatic detergents in wash procedures.

Evaluation Criteria: The City will report the number of designated municipal vehicle washing areas. The City will also keep attendance records and report the number of municipal workers trained during the reporting period. This information will help measure the municipal workers awareness of storm water issues.

Activity 4. Pesticide Application

Pesticide application in City Right of Ways is performed by A-1 Insulation and Extermination. Prior to entering into or renewing any additional contracts the City will require the contractor to provide all necessary certifications and licensing during the bid process.

The City does not have a Mosquito Control Program. However, should the City begin spraying for mosquitoes, the City will obtain an NPDES permit from ADEM for application practices if application thresholds are met. The City will follow ADEM regulations regarding mosquito pesticide application.

To reduce potential impact to waterways, the City will review all areas where pesticides are to be used. Areas where pesticides are determine to post a threat to water quality should be noted on the storm water map and identified in the annual report.

The City will comply with pesticide application and disposal regulations.

Evaluation Criteria: The City will maintain a copy of the current certification. The City will report the number of areas where it was determined pesticides impacted waterways during the reporting period, if any, and how the impact was resolved. This information will help measure the effectiveness of the City’s review.

7.6.3 Changes

The City of Southside requests no changes to the Pollution Prevention and Good Housekeeping for Municipal Operations strategies identified in the 2012 SWMP.

7.6.4 Responsible Party

The City Supervisor is responsible for implementing the identified Pollution Prevention and Good Housekeeping for Municipal Operations strategies.

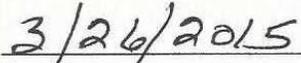
7.7 Agency Certification

This Annual Report is produced jointly by the eight jurisdictions comprising the Gadsden-Etowah Phase II Small Municipal Separate Storm Sewer System. Implementation of the minimum control measures applicable to each jurisdiction is the responsibility of the individual jurisdiction. Implementation of the storm water monitoring component of the Storm Water Management Program is a joint responsibility of all jurisdictions.

I certify under penalty of law that this document and all attachments pertaining to the City of Southside were prepared under my directions or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated 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 or imprisonment for knowing violations.



Wally Burns, Mayor
City of Southside, Alabama



Date

8. CITY OF GLENCOE

The City of Glencoe encompasses 5% of the Urbanized Area and accounts for 4.4% of the population.

In accordance with Part III.B of the NPDES General Permit, the 2012 Storm Water Management Program detailed the specific activities the City of Glencoe planned to undertake regarding the following six minimum control measures:

1. Public Education and Outreach on Storm Water Impacts
2. Public Involvement/Participation
3. Illicit Discharge Detection and Elimination (IDDE)
4. Construction Site Storm Water Runoff Control
5. Post-Construction Storm Water Management in New Development and Redevelopment
6. Pollution Prevention/Good Housekeeping for Municipal Operations

The following sections detail the current implementation status of each minimum control measure, activities conducted during the current reporting period, planned activities for the upcoming reporting period, requested changes to the provisions of the 2012 SWMP, and the party responsible for implementing each minimum control measure.

8.1 Public Education and Outreach

8.1.1 2014 to 2015 Implementation Status

During the April 1, 2014 to March 31, 2015 reporting period, the City of Glencoe completed five (5) of the seven (7) Public Education and Outreach strategies identified in the previous Annual Report and began work on one (1) strategy. The City of Glencoe failed to meet one (1) of the strategies identified in the previous Annual Report.

The City of Glencoe planned to participate in Renew Our Rivers in April 2014; however the City was unable to participate because the cleanup was postponed due to forecast of severe weather and flood stage of the Coosa River. Planning information such as advertisement documentation is not available due to change in Code Official personnel (Activity 3).

The City of Glencoe did not promote or participate in the Etowah County Water Festival (Activity 4).

A table identifying each Public Education and Outreach strategy planned for the 2014-2015 reporting period, a description of actions taken by the City of Glencoe, and a description of activities planned for the next reporting period is provided in **Appendix G**. Supporting documentation is also included in **Appendix G**.

8.1.2 Proposed Activities for the April 1, 2015 to March 31, 2016 Reporting Period

The City will implement the following activities as part of their Public Education and Outreach Program during the 2015-2016 reporting period. To evaluate the success of the program and aid in preparing the required Annual Report, evaluation criteria have been established for each strategy.

Activity 1. Distribute Storm Water Educational Material

The City will develop and distribute storm water education material available to the public at the Building Department and the Library. Topics will include the following:

- Introduce the MS4 to the general public and discuss the storm water cycle and how common contaminants enter the storm water system.
- Educate households and businesses about proper and improper use, storage, and disposal of common household chemicals such as herbicides, pesticides, and fertilizers.
- Make the public aware of how the improper use of these chemicals can impact storm water quality.
- Discuss how the cumulative effect of these contaminants impact the Coosa River and what individual households and businesses can do to reduce storm water pollutants.
- Provide information on additional resources pertaining to storm water, storm water pollution, and Neely Henry Lake TMDLs.
- Provide information on storm water contacts within the City of Glencoe and information on reporting potential storm water violations.

Evaluation Criteria: The City will report the number of materials placed at the Building Department and Library and how often the materials were replaced during the reporting period. This information will indicate the number of people who received educational materials.

Activity 2. Maintain the Storm Water Webpage

The City will regularly update the Storm Water webpage on the City of Glencoe website that was developed during the 2012-2013 reporting period until the new City of Glencoe website. Participation will be tracked though the number of “hits” on the webpage for the reporting period. The webpage will:

- Include general information on the Gadsden-Etowah MS4;
- Discuss the storm water cycle and how common contaminants enter the storm water system;
- Provide educational materials about proper and improper use, storage, and disposal of common household chemicals;
- Provide links to related storm water resources;
- Provide contact information for reporting illicit discharges; and,
- Provide a calendar of upcoming community events related to storm water outreach.

Evaluation Criteria: The City will report what information was added to the webpage and the number of “hits” on the webpage. The City has an additional target of **100 contacts** for the reporting period. This information will indicate the number of people who view the webpage and the associated educational materials.

Activity 3. Partnerships in Educational and Public Involvement Events

The City will partner with Keep Etowah Beautiful, the Middle Coosa Watershed Project, and/or Alabama Power to distribute storm water educational material and promote events such as *Renew Our Rivers*, *Message in a Bottle*, and/or community cleanup days. The events will be advertised at the City Hall, Library, and other businesses. Promotion methods may include co-sponsoring radio, television, and/or print advertisement with co-permittees and other stakeholders. City personnel will participate in the events.

Evaluation Criteria: The City will report number of participants who received educational materials during the events and the ways in which the event the City promoted and/or advertised the events. This information will indicate the number of people who received educational materials and will help measure the public awareness of the events and degree of public participation.

Activity 4. Promote and Participate in the Etowah County Water Festival

The City will promote and participate in the annual *Etowah County Water Festival* through City resources. Promotion methods may include co-sponsoring radio, television, and/or print advertisement with co-permittees and other stakeholders. City personnel will participate in the festival.

Evaluation Criteria: The City will report number of City volunteers at the event and the ways in which the City promoted and/or advertised the event. This information will indicate the City’s participation and will help measure the public awareness of the event and degree of public and City participation.

Activity 5. Provide Information on Construction Site Storm Water Impacts

The City will provide pre-printed information on how construction site runoff can impact storm water quality to individuals requesting plan review and building/development permits.

Evaluation Criteria: The City will report the number of permits issued during the reporting period. This information will indicate the number of people who received educational materials.

Activity 6. Provide Information on Low Impact/Green Development

The City will provide pre-printed educational information on green development. Information may include references to additional resources such as the Green Building Alliance, Low Impact Development Center, and U.S. Department of Housing and Urban Development. The City will provide information to individuals requesting plan review and building/development permits.

The City will encourage developers and engineers to consider green infrastructure alternatives during the plan review process.

Evaluation Criteria: The City will report the number of permits issued and number of projects that incorporate these techniques during the reporting period. This information will indicate the number of people who received educational materials.

Activity 7. Gadsden-Etowah MS4 Steering Committee Meetings

The City will coordinate and/or participate in quarterly meetings of the Stormwater Steering Committee for entity updates, networking, and coordination of activities and BMP strategies.

Evaluation Criteria: The City will provide meeting agenda's during the reporting period. The City will keep attendance records. This information will indicate the participation of the steering committee and their interest in networking and coordination of activities.

8.1.3 Changes

The City of Glencoe requests no changes to the Public Education and Outreach strategies identified in the 2012 SWMP.

8.1.4 Responsible Party

The City of Glencoe Code Enforcement Department is responsible for overseeing, developing, and coordinating the Public Education and Outreach efforts.

8.2 Public Involvement and Participation

8.2.1 2014 to 2015 Implementation Status

During the April 1, 2014 to March 31, 2015 reporting period, the City of Glencoe completed two (2) of the six (6) Public Involvement and Participation strategies identified in the previous Annual Report and began working on three (3) of the remaining strategies. The City failed to meet one (1) of the strategy identified in the previous Annual Report.

The City of Glencoe along with the Gadsden-Etowah Steering Committee scheduled a Second Annual MS4 Conference again February 25, 2015; however due to inclement weather forecast the conference was postponed two days before the conference. The County received 8 inches of snow that day. The Conference has been rescheduled for April 15, 2015 (Activity 1).

The City of Glencoe planned to participate in Renew Our Rivers in April 2014; however the City was unable to participate because the cleanup was postponed due to forecast of severe weather and flood stage of the Coosa River. Planning information such as advertisement documentation is not available due to change in Code Official personnel (Activity 4).

The City coordinates a community clean-up day on April 26th as a partnership with the local High School. The clean-up day was cancelled due to a conflict with the schools scheduling (Activity 5).

The City of Glencoe did not promote or participate in the Etowah County Water Festival (Activity 6).

A table identifying each Public Involvement and Participation strategy planned for the 2014-2015 reporting period, a description of actions taken by the City of Glencoe, and a description of activities planned for the next reporting period is provided in **Appendix G**. Supporting documentation is also included in **Appendix G**.

8.2.2 Proposed Activities for the April 1, 2015 to March 31, 2016 Reporting Period

The City will implement the following activities as part of their Public Involvement and Participation Program during the 2015-2016 reporting period. To evaluate the success of the program and aid in preparing the required Annual Report, evaluation criteria have been established for each strategy.

Activity 1. Storm Water Conference/Public Meeting

The City will develop and coordinate an annual Storm Water Conference/Public Meeting for local businesses and residents. The second annual MS4 conference is currently scheduled for April 15, 2015. The City will develop and coordinate a third annual MS4 conference in 2015 or 2016.

This will be a joint outreach effort with all co-permittees participating. The agendas may include general information on the Gadsden-Etowah MS4, presentations pertaining to how common contaminants enter the storm water system, and presentations by key stakeholders such as the ADEM, Natural Resources and Conservation Service, and Clean Water Partnership. The purpose of the conference/meeting will be to encourage public participation and input into the storm water management program.

Evaluation Criteria: The City will report the number of conference attendees and provide a copy of the agenda to demonstrate the focus of the conference. This information will help measure the degree of public education and involvement.

Activity 2. Public Reporting and Tracking System

The City Storm Water webpage currently instructs the public to report non-compliant construction sites, illicit discharges (including spills or illegal dumping), impaired waterways, and violations of ordinances relating to storm water pollution to the Code Official. The Code Official's name and contact information is currently provided on the City website under Code Enforcement and on the educational materials available at the Building Department and the Library. The City will evaluate the current public reporting and tracking methods.

The Code Official will continue to document and track all reports, investigations, and violations and track them using a Microsoft Excel spreadsheet.

Evaluation Criteria: The City will report the total number of complaints received, the number of complaints addressed, and the number of complaints resolved during the reporting period. The City will also report whether or not the received reports contain the required information to find and address the suspected problem. The City will provide a summary of at least one complaint received during the reporting period. This information will help measure the effectiveness of the reporting system, as well as the public awareness and concern of storm water issues.

Activity 3. Provide Comment and Feedback Methods

The City will provide a contact number on the Storm Water web page for members of the public to provide comments on the MS4 program, feedback on the public outreach efforts, and suggestions for improvement to the program.

The City will evaluate the comment feedback methods each reporting period.

Evaluation Criteria: The City will evaluate the comment and feedback methods established by the City. The City will report the total number of comments received from the public.

Activity 4. Promote and Participate in Renew Our Rivers

The City will participate in and promote the *Renew Our Rivers* program in the **November of 2015**. The event will be advertised at the City Hall, Library and other businesses.

Promotion methods may include co-sponsoring radio, television, and/or print advertisement with co-permittees and other stakeholders. City personnel will participate in the event.

Evaluation Criteria: The City will report the number of City volunteers at the event and the ways in which the City promoted and/or advertised the event. This information will indicate the number of people who received educational materials and will help measure the public awareness of the event and degree of public participation.

Activity 5. Coordinate and Promote an Annual Community Cleanup Day

In addition to the *Renew our Rivers* program, the City will coordinate and promote an annual community cleanup day in **Spring of 2015** targeting secondary waterways and primary contributing watersheds. Promotion methods may include co-sponsoring radio, television, and/or print advertisement with co-permittees and other stakeholders. City personnel will participate in the event.

Evaluation Criteria: The City will report the number of volunteers and the ways in which the event was promoted and/or advertised. This information will indicate the number of people who received educational materials and will help measure the public awareness of the event and degree of public participation.

Activity 6. Promote and Participate in the Etowah County Water Festival

The City will promote and participate in the annual *Etowah County Water Festival* through City resources. Promotion methods may include co-sponsoring radio, television, and/or print advertisement with co-permittees and other stakeholders. City personnel will participate in the festival.

Evaluation Criteria: The City will report number of City volunteers at the event and the ways in which the City promoted and/or advertised the event. This information will indicate the City's participation and will help measure the public awareness of the event and degree of public and City participation.

8.2.3 Changes

The City of Glencoe requests no changes to the Public Involvement and Participation strategies identified in the 2012 SWMP.

8.2.4 Responsible Party

The City of Glencoe Code Enforcement Department is responsible for overseeing, developing, and coordinating the Public Involvement and Participation efforts.

8.3 Illicit Discharge Detection and Elimination

8.3.1 2014 to 2015 Implementation Status

During the April 1, 2014 to March 31, 2015 reporting period, the City of Glencoe completed seventeen (17) of the seventeen (17) Illicit Discharge Detection and Elimination strategies identified in the previous Annual Report.

A table identifying each Illicit Discharge Detection and Elimination strategy planned for the 2014-2015 reporting period, a description of actions taken by the City of Glencoe, and a description of activities planned for the next reporting period is provided in **Appendix G**. Supporting documentation is also included in **Appendix G**.

8.3.2 Proposed Activities for the April 1, 2015 to March 31, 2016 Reporting Period

The City will implement the following activities as part of their Illicit Discharge Detection and Elimination Program during the 2015-2016 reporting period. To evaluate the success of the program and aid in preparing the required Annual Report, evaluation criteria have been established for each strategy.

The City contracted S&ME, Inc. to assist in the implementation of this control measure. However, the City will be responsible for the completion of these activities, whether through City resources or an outside contractor, and for reporting the required evaluation criteria to ADEM.

Identifying Priority Areas

Activity 1. Identify Priority Areas

The City delineated drainage basins in the 2014-2015 reporting period. The City will then re-evaluate the drainage basins by **April 30, 2015** to determine the Priority Areas for the 2015-2016 reporting period. Priority Areas will be identified using the illicit discharge potential (IDP) calculation procedures detailed in Section 3 of the IDDE Program. The City will maintain records of the IDP calculations for each drainage basin.

Evaluation Criteria: The City will report the total IDP score for each drainage basin and will provide an updated map showing the identified Priority Areas. The City will report drainage basins that are newly listed or de-listed from the previous reporting year's calculations.

Field Assessment Activities

Activity 2. **Outfall Identification**

The City will implement a stream-walking program designed to identify previously unknown outfalls to the MS4. The City also plans to map a portion of the waterbodies that receive discharge from the MS4 during the reporting period. The implementation process is detailed in Section 4 of the IDDE Program.

Evaluation Criteria: The City will maintain records of field observations. The City will report the number of outfalls identified and the stream length walked during the reporting period. The City will provide updated tables and maps that include the outfalls identified by the stream-walking program.

Activity 3. **Probable Outfall Verification**

Probable outfalls may be identified during mapping activities, during review of proposed development plans, or through illicit discharge reports. When a probable outfall is identified, it will be added to the Storm Water System Map and labeled as unverified.

The City will verify probable outfalls through field observation within 18 months of their addition to the Storm Water System Map. The implementation process is detailed in Section 4 of the IDDE Program.

Evaluation Criteria: The City will report the number of probable outfalls that were identified and the number of outfalls that were verified during the reporting period. The City will provide updated tables and maps that include the verified outfalls, as well as probable outfalls that are planned to be verified in the following reporting period. The City will maintain records of field observations.

Activity 4. **Outfall Reconnaissance Inventory**

During the reporting period, the City or subcontracted crews will conduct dry weather monitoring of major outfalls in Priority Areas. The City will also inspect a portion of the outfalls located outside Priority Areas. The implementation process is detailed in Section 7 of the IDDE Program.

Evaluation Criteria: The City will maintain records of field observations. The City will report the number of outfalls inspected during the reporting period. The

City will also provide a summary of the results of outfall reconnaissance inventory activities conducted during the reporting period.

Activity 5. Suspect Discharge Sampling

If a dry weather flow has a severity index of 3 on one or more indicators in Section 4 of the Outfall Reconnaissance Inventory Field Sheet, or if field screening indicates a suspect discharge, field crews will collect samples for further analysis. The implementation process is detailed in Section 7 of the IDDE Program.

Evaluation Criteria: The City will report the number of identified dry weather flows, suspect discharges, and samples collected during the reporting period. The City will report the analysis results for the collected samples. The City will report if the suspect discharge was confirmed to be an illicit discharge and, if known, the type of illicit discharge.

IDDE Investigation

Activity 6. Outfall Ranking

Data from each Outfall Reconnaissance Inventory Field Sheet will be analyzed to characterize the observed outfall as having obvious, suspect, possible, or unlikely discharge potential. Obvious and suspect illicit discharges will be investigated within 10 and 30 days, respectively. Potential illicit discharges will be investigated within 60 days. The implementation process is detailed in Section 7 of the IDDE Program.

Evaluation Criteria: The City will report the ranking of each outfall inspected during the reporting period. The City will report the number of outfalls that required further investigation.

Activity 7. Discharge Investigation

Illicit discharge investigations will be performed to determine the source of a discharge problem. The implementation process is detailed in Section 7 of the IDDE Program.

Evaluation Criteria: The City will report the number of illicit discharge investigations performed during the reporting period. The City will also report the number of confirmed illicit discharges, if a source was determined, and if the discharge was eliminated.

Corrective Action Record Keeping

Activity 8. Corrective Action Record Keeping

When a suspect illicit discharge or illicit connection is identified, a case log detailing pertinent information will be created. Throughout the problem investigation and corrective action activities, all information related to the incident or property in question will be documented in the case log.

Evaluation Criteria: The City will maintain records of the correction actions. The City will report the number of confirmed illicit discharges and the number of illicit discharges corrected or eliminated during the reporting period. The City will also report the number of confirmed illicit discharges where corrective action is pending.

Storm Water System Mapping

Activity 9. Create Storm Water System Map – Existing Features

The City determined that they didn't have the resources to create a map in digital format. The City chose to update an existing hard copy map as needed. Additionally, the City will use google earth to locate and store outfalls as well as the hard copy map. The hard copy map will be updated as needed. The mapping will include:

- The location of all outfalls (to include latitude and longitude) and the names and location of all waters of the State that receive discharges from those outfalls;
- Structural BMPs owned, operated, and maintained within the City limits;
- An update of known connections to the MS4 authorized or allowed by the City;
- Any geographic areas which may discharge storm water into the MS4, which may not be located within the municipal boundary;
- Identification and location of waterways within the City including detention ponds, streams, and ditches;

The implementation process is further discussed in Section 5 of the IDDE Program.

Evaluation Criteria: The City will provide an updated Storm Water System Map showing the features added during the reporting period.

Activity 10. Update Storm Water System Map – Future Additions

Proposed additions within the City, including new storm sewer and drainage ditches, will be mapped based on the civil plans provided to the City or digitized by the City and updated on the hard copy map. Outfalls from proposed development will be verified after construction is complete, as part of Activity 3. The implementation process is further discussed in Section 5 of the IDDE Program.

Evaluation Criteria: The City will report the number of civil plans provided to the City and the number of verified new features or outfalls during the reporting period. The City will provide an updated Storm Water System Map showing the features added during the reporting period.

Illicit Discharge Ordinance

Activity 11. Evaluate IDDE Ordinance

Section 8 of Ordinance 07-06 currently regulates Illicit Discharges. The City will evaluate the ordinance annually thereafter by **December 31, 2015**. If updates are required, the City will amend the existing ordinance or prepare a new ordinance.

Evaluation Criteria: The ordinance will be evaluated on its effectiveness in addressing identified illicit discharges and preventing repeat offenders. The City will report the number of complaints received, number of illicit discharges identified during the reporting period, the number of resolved violations, the number of repeat offenders, and the number of enforcement actions taken.

IDDE Public Education

Activity 12. Distribute Storm Water Educational Material

The City will distribute educational materials highlighting identification and reporting of potential illicit discharges at the Building Department and the Library.

Evaluation Criteria: The City will report the number of materials placed at the City Hall and how often the materials were replaced during the reporting period. This information will indicate the number of people who received educational materials.

Activity 13. Public Reporting and Tracking System

The City currently instructs members of the public to report suspected illicit discharges (including spills or illegal dumping) to the Code Official. The Code Official's name and contact information is currently provided on the City website

under Code Enforcement and on the educational materials available at the Building Department and the Library. The City will evaluate the current public reporting and tracking methods.

The Code Official will continue to document and track all reports, investigations, and violations and track them using a Microsoft Excel spreadsheet.

Evaluation Criteria: The City will report the total number of complaints received, the number of complaints addressed, and the number of complaints resolved during the reporting period. The City will also report whether or not the received reports contain the required information to find and address the suspected problem. The City will provide a summary of at least one complaint received during the reporting period. This information will help measure the effectiveness of the reporting system, as well as the public awareness and concern of storm water issues.

Activity 14. Municipal Training

Municipal workers will be trained in the identification of illicit discharges as well as the prevention of storm water pollution at municipal facilities or related to municipal activities. Specific municipal operations such as fueling, vehicle maintenance, vehicle washing, paint and paint waste storage and disposal, and used oil disposal may be addressed. The next training session will be conducted by **March 31, 2016**.

Municipal workers will be notified of the procedures for reporting suspected illicit discharges to Rodney Wall, Code Official, the City IDDE Program Manager, including the preferred method of contact (email) and the information to be included in the report (e.g., location, date, time, observations).

Evaluation Criteria: The City will provide details on the training topics presented to the municipal workers. The City will maintain attendance records and report the number of municipal workers trained during the reporting period. This information will help measure the municipal workers awareness of illicit discharges and storm water issues.

Storm Water Monitoring

Activity 15. Storm Water Monitoring Locations

Storm water monitoring locations were identified in the 2012 SWMP and were revised in January 2014. The City will add these locations to the existing Storm Water System Map.

If additional storm water monitoring points are recommended as a result of the analysis of the monitoring data, the City will update the map with the revised or additional locations.

Evaluation Criteria: The City will provide an updated Storm Water System Map showing the features added during the reporting period.

Activity 16. Evaluation of Monitoring Data

In conjunction with the monitoring provisions of Section 2.2 of the SWMP, the City of Glencoe will evaluate the collected monitoring data for indicators of potential illicit discharges within the City and to assess the effectiveness of the BMPs in achieving the 2008 TMDL.

Evaluation Criteria: The City will report which monitoring points appear to have relatively higher pollutant loads. The City will make recommendations to the Gadsden-Etowah MS4 Storm Water Steering Committee to add and/or modify monitoring points to better characterize discharges from the MS4.

NPDES Industrial Permitting

Activity 17. As authorized by the Clean Water Act, the NPDES Permit program controls water pollution by regulating point sources that discharge pollutants into waters of the United States. Title 40, Part 122 of the Code of Federal Regulations (40CFR122) specifies that discharges associated with certain industrial activities must obtain an NPDES permit. The ADEM currently provides for individual and general NPDES permitting.

Information pertaining to permitted facilities will be obtained from available public sources such as MYWATERS Mapping, EPA ECHO Database, and ADEM E-file and incorporated into the Storm Water System Map. This information will be used in conjunction with the storm water system mapping and monitoring data to evaluate potential sources of storm water pollution and to identify unpermitted facilities.

Unpermitted facilities that require an NPDES permit will be reported to the Industrial Section of the ADEM. The City of Glencoe continues to rely on the ADEM for industrial NPDES permitting and enforcement.

Evaluation Criteria: The City will provide the number of permitted facilities reported to ADEM during the reporting period, if any. This information will help measure the effectiveness of the land use evaluations.

8.3.3 Changes

The City of Glencoe requests no changes to the Illicit Discharge Detection and Elimination strategies identified in the 2012 SWMP.

8.3.4 Responsible Party

The City of Glencoe Code Enforcement Department, Water Department, and Public Works Department will have joint responsible for overseeing, developing, coordinating, and enforcing the IDDE program in the City of Glencoe regulated MS4 area.

8.4 Construction Site Storm Water Runoff

8.4.1 2014 to 2015 Implementation Status

During the April 1, 2014 to March 31, 2015 reporting period, the City of Glencoe completed six (6) of the six (6) Construction Site Storm Water Runoff strategies identified in the previous Annual Report.

A table identifying each Construction Site Storm Water Runoff strategy planned for the 2014-2015 reporting period, a description of actions taken by the City of Glencoe, and a description of activities planned for the next reporting period is provided in **Appendix G**. Supporting documentation is also included in **Appendix G**.

8.4.2 Proposed Activities for the April 1, 2015 to March 31, 2016 Reporting Period

The City will implement the following activities as part of their Construction Site Storm Water Runoff Program during the 2015-2016 reporting period. To evaluate the success of the program and aid in preparing the required Annual Report, evaluation criteria have been established for each strategy.

Activity 1. Erosion and Sediment Control Ordinance

Ordinance 07-06 currently governs storm water management within the city.

The City will evaluate the effectiveness of the Ordinance by **December 31, 2015**. If changes are warranted, a new or revised ordinance will be approved and implemented.

Evaluation Criteria: The ordinance will be evaluated on its effectiveness in addressing erosion and sediment control. The City will report the number of non-compliant construction sites identified by the City, the number of enforcement actions taken, the number of non-compliant sites reported to the ADEM, and whether the individuals or businesses responsible for identified non-compliant construction sites are repeat offenders.

Activity 2. Construction Site Inspection Program

Designated City personnel will inspect all qualifying construction sites within 60 days of initial disturbance, at periodic intervals during construction, and following stabilization. Ordinance No. O-10-2012 provides for periodic inspections of construction sites at the discretion of the Enforcement Officer or City Engineer.

The City will evaluate the effectiveness of the construction site inspection program **by December 31, 2015.**

Evaluation Criteria: The City will report the number of inspections completed, the number of non-compliant construction sites identified by the City, the number of enforcement actions taken, the number of non-compliant sites reported to the ADEM, and whether the individuals or business responsible for identified non-compliant construction sites are repeat offenders. The City will also provide a summary of at least one inspection conducted during the reporting period that resulted in enforcement actions.

Activity 3. Sediment and Erosion Control Plan Review

Section 3(4)(b) of Ordinance 07-06 requires that each application for a Land Disturbance Permit be accompanied by a Sediment and Erosion Control Plan and a Stormwater Management Plan providing for storm water management during the land disturbing activity and after the activity has been completed.

Plan review will ensure proposed projects adequately address the City’s erosion, sediment, and pollution control requirements. Plan review will also take into consideration what potential impacts to water quality the project may have.

Evaluation Criteria: The City will report the total number of plans reviewed, the number of plans approved or rejected during the reporting period, and number of plans that meet the requirements the Alabama Construction General Permit.

Activity 4. BMP Training Program

City personnel tasked with plan review and/or conducting BMP inspections will undergo annual training on proper design, installation, inspection, and maintenance of on-site control measures and on new technology and practices. All inspectors will complete initial storm water awareness training and attend annual refreshers.

Rodney Wall, the Glencoe Code Official, was certified as a QCI in November 2014. QCI certification will be maintained through the approved annual refresher courses. Mr. Wall will attend a 4-hour refresher course by **November 2015.** Copies of the QCI certificates and awareness training records will be included in

the annual report.

Evaluation Criteria: The City will provide a copy of the QCI certificates and records of awareness training received during the reporting period.

Activity 5. Public Reporting and Tracking

The City Storm Water web page currently instructs the public to report non-compliant construction sites to the Code Official. The Code Official's name and contact information is currently provided on the City website under Code Enforcement and on the educational materials available at the Building Department and the Library. The City will evaluate the current public reporting and tracking methods.

The Code Official will continue to document and track all reports, investigations, and violations and track them using a Microsoft Excel spreadsheet.

Evaluation Criteria: The City will report the total number of complaints received, the number of addressed complaints, and the number of resolved complaints during the reporting period. The City will also report whether or not the received reports contain the required information to find and address the suspected problem. The City will provide a summary of at least one complaint received during the reporting period. This information will help measure the effectiveness of the reporting system, as well as the public awareness and concern regarding construction storm water issues.

Activity 6. Notify ADEM of Non-Complaint Sites

The City will notify the ADEM of any construction sites where a possible violation of the Clean Water Act has occurred. Possible violations may include, but are not limited to, releases of sediment to a water of the State or failure to initiate corrective actions following an inspection by the City.

The City of Glencoe continues to rely on the ADEM for construction NPDES enforcement.

Evaluation Criteria: The City will report the total number of non-compliant construction sites reported to ADEM during the reporting period.

8.4.3 Changes

The City of Glencoe requests no changes to the Construction Site Storm Water Runoff strategies identified in the 2012 SWMP.

8.4.4 Responsible Party

The City of Glencoe Code Enforcement Officer is responsible for implementing and tracking the construction site storm water provisions of the ordinance as well as other Construction Site Storm Water Runoff strategies.

8.5 Post-Construction Storm Water Management

8.5.1 2014 to 2015 Implementation Status

During the April 1, 2014 to March 31, 2015 reporting period, the City of Glencoe completed four (4) of the four (4) Post-Construction Storm Water Management strategies identified in the previous Annual Report.

A table identifying each Post-Construction Storm Water Management strategy planned for the 2014-2015 reporting period, a description of actions taken by the City of Glencoe, and a description of activities planned for the next reporting period is provided in **Appendix G**. Supporting documentation is also included in **Appendix G**.

8.5.2 Proposed Activities for the April 1, 201 to March 31, 2016 Reporting Period

The City will implement the following activities as part of their Post-Construction Storm Water Management Program during the 2015-2016 reporting period. To evaluate the success of the program and aid in preparing the required Annual Report, evaluation criteria have been established for each strategy.

Activity 1. Reduce Post-Construction Runoff Volume

Section 6 of Ordinance No. 07-06 provides for post-construction storm water management measures to reduce runoff volume. Specifically, all sites are required to have at least 10% vegetated area, and re-vegetated areas are required to have a minimum 75% survival of the cover crop for one year.

The ordinance will be evaluated by **December 31, 2015**. If changes are warranted, a new or revised ordinance will be approved and implemented.

Evaluation Criteria: The ordinance will be evaluated on its effectiveness in reducing runoff from new development or redevelopment. The City will report the number of submitted plans that include measures to reduce runoff volume and the number of enforcement actions taken. The evaluation may also examine which control measures are typically utilized and if additional examples should be added to the ordinance.

Activity 2. Reducing Pollutants from Development

Section 7 of Ordinance No. 07-06 requires that storm water runoff be controlled

to prevent pollution of local waters and provides a list of possible control measures.

The ordinance will be evaluated by **December 31, 2015**. If changes are warranted, a new or revised ordinance will be approved and implemented.

Evaluation Criteria: The ordinance will be evaluated on its effectiveness in reducing pollutants in runoff from new development or redevelopment. The evaluation may also examine which control measures are typically utilized and if examples of appropriate control measures should be added to the ordinance. The City will report the number of developments where treatment of storm water runoff is required and the criteria for requiring treatment of storm water runoff.

Activity 3. Long-Term Maintenance of Storm Water Controls

Section 6 of Ordinance No. 07-06 requires long-term maintenance of storm water control structures and provides for the City to require inspection, funding, and planning for permanent storm water management structures. Section 5 requires that the design and planning of all storm water management facilities include detailed maintenance and repair procedures.

The ordinance will be evaluated by **December 31, 2015**. If changes are warranted, a new or revised ordinance will be approved and implemented.

Evaluation Criteria: The ordinance will be evaluated on its effectiveness in addressing long-term maintenance of storm water controls. The City will report the number of submitted plans that include detailed maintenance procedures, the number of maintenance agreements reviewed, the number of maintenance provisions approved or denied, and the number of enforcement actions taken.

Activity 4. Evaluate Obstacles to Low Impact/Green Development

The City adopted the 2009 Residential Building Code by ordinance which requires green techniques.

The City will review and evaluate policies and ordinances related to building codes, or other local regulations, with a goal of identifying regulatory and policy impediments to the installation of green infrastructure and low-impact development techniques.

Evaluation Criteria: The City will report if obstacles are identified and provide a brief summary on how the conflicts will be resolved.

8.5.3 Changes

The City of Glencoe requests no changes to the Post-Construction Storm Water Runoff strategies identified in the 2012 SWMP.

8.5.4 Responsible Party

The City of Glencoe Code Enforcement Officer is responsible for implementing and tracking the provisions of the ordinance pertaining to post construction storm water management.

8.6 Pollution Prevention and Good Housekeeping for Municipal Operations

8.6.1 2014 to 2015 Implementation Status

During the April 1, 2014 to March 31, 2015 reporting period, the City of Glencoe completed four (4) of the four (4) Pollution Prevention and Good Housekeeping for Municipal Operations strategies identified in the previous Annual Report.

The City of Glencoe also completed three (3) strategies beyond those proposed in the previous Annual Report. These strategies included:

- The City of Glencoe provides brush, limb, bagged leaves, and grass clippings pick-up for residents (Activity 5)
- The City of Glencoe recycles used oil from city vehicles (Activity 6)
- The City of Glencoe recycles plastic and paper in the break room at the City Hall (Activity 7)

A table identifying each Pollution Prevention and Good Housekeeping for Municipal Operations strategy planned for the 2014-2015 reporting period, a description of actions taken by the City of Glencoe, and a description of activities planned for the next reporting period is provided in **Appendix G**. Supporting documentation is also included in **Appendix G**.

8.6.2 Proposed Activities for the April 1, 2015 to March 31, 2016 Reporting Period

The City will implement the following activities as part of their Pollution Prevention and Good Housekeeping for Municipal Operations Program during the 2015-2016 reporting period. To evaluate the success of the program and aid in preparing the required Annual Report, evaluation criteria have been established for each strategy.

Activity 1. Employee Training

The City continue to implement a training program for municipal employees that focuses on pollution prevention, good housekeeping measures, identification of potential illicit discharges, and other potential threats to storm water quality. Training materials will focus on vehicle maintenance, right-of-way maintenance, and identification and reporting of potential illicit discharges.

The next training session will be conducted by **March 31, 2016**.

Evaluation Criteria: The City will provide details on the training topics presented to municipal workers during the reporting period. The City will keep attendance records and report the number of municipal workers trained during the reporting period. This information will help measure the municipal workers awareness of storm water issues.

Activity 2. Vehicle Maintenance Program

The City of Glencoe owns and operates a variety of vehicles and equipment used in municipal operations and maintenance. These vehicles include passenger cars, trucks, vans, and equipment. The City will continue to conduct monthly inspections and routine maintenance of owned vehicles and will inspect vehicles for the presence of fluid leaks during routine maintenance. The City will promptly repair vehicles determined to have leaks.

The City will use the inspection log for recording and tracking inspection and maintenance of vehicles and equipment.

Evaluation Criteria: The City will provide a completed inspection log for at least one vehicle used during the reporting period. The City will report the frequency of inspections and the number of vehicle or equipment leaks identified during the reporting period as a result of the inspection program. This information will help measure the effectiveness of the vehicle inspection and maintenance program.

Activity 3. Vehicle Wash Areas

A specified area for vehicle washing has been established. Each location will be reviewed, inspected, and modified as needed throughout the year. During the annual BMP training, the City will notify all employees of the locations of the designated wash areas.

The City discontinued use of phosphate-containing soaps for municipal vehicle washing areas at all locations. If possible, the City will discontinue use of phosphate-containing soaps for municipal vehicle washing (unless washing takes place at an NPDES-permitted facility), and will incorporate non-phosphatic detergents in wash procedures.

Evaluation Criteria: The City will report the number of designated municipal vehicle washing areas. The City will also keep attendance records and report the number of municipal workers trained during the reporting period. This

information will help measure the municipal workers awareness of storm water issues.

Activity 4. Pesticide Application

Currently, the City of Glencoe does not spray pesticides (insecticides and herbicides) to control insect pests and unwanted vegetation; however, if the City decides to do so, the City will contract out pesticide application until select City employees obtain the necessary certification. Prior to entering into or renewing any additional contracts the City will require the contractor to provide all necessary certifications and licensing during the bid process.

To reduce potential impact to waterways, the City will review all areas where pesticides are to be used. Areas where pesticides are determine to post a threat to water quality should be noted on the storm water map and identified in the annual report.

The City will comply with pesticide application and disposal regulations.

Evaluation Criteria: The City will maintain a copy of the current certification. The City will report the number of areas where it was determined pesticides impacted waterways during the reporting period, if any, and how the impact was resolved. This information will help measure the effectiveness of the City's review.

8.6.3 Changes

The City of Glencoe requests no changes to the Pollution Prevention and Good Housekeeping for Municipal Operations strategies identified in the 2012 SWMP.

8.6.4 Responsible Party

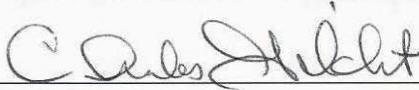
The City of Glencoe Code Enforcement Officer is responsible for implementing and tracking Pollution Prevention and Good Housekeeping strategies within municipal operations.

8.7 Agency Certification

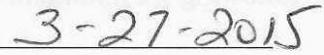
This Annual Report is produced jointly by the eight jurisdictions comprising the Gadsden-Etowah Phase II Small Municipal Separate Storm Sewer System. Implementation of the minimum control measures applicable to each jurisdiction is the responsibility of the individual jurisdiction. Implementation of the storm water monitoring component of the Storm Water Management Program is a joint responsibility of all jurisdictions.

I certify under penalty of law that this document and all attachments pertaining to the City of Glencoe were prepared under my directions or supervision in accordance with a system designed

to assure that qualified personnel properly gathered and evaluated 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 or imprisonment for knowing violations.



Charles Gilchrist, Mayor
City of Glencoe, Alabama



Date

9. CITY OF HOKES BLUFF

The City of Hokes Bluff encompasses 5.5% of the Urbanized Area and accounts for 4.4% of the population.

In accordance with Part III.B of the NPDES General Permit, the 2012 Storm Water Management Program detailed the specific activities the City of Hokes Bluff planned to undertake regarding the following six minimum control measures:

1. Public Education and Outreach on Storm Water Impacts
2. Public Involvement/Participation
3. Illicit Discharge Detection and Elimination (IDDE)
4. Construction Site Storm Water Runoff Control
5. Post-Construction Storm Water Management in New Development and Redevelopment
6. Pollution Prevention/Good Housekeeping for Municipal Operations

The following sections detail the current implementation status of each minimum control measure, activities conducted during the current reporting period, planned activities for the upcoming reporting period, requested changes to the provisions of the 2012 SWMP, and the party responsible for implementing each minimum control measure.

9.1 Public Education and Outreach

9.1.1 2014 to 2015 Implementation Status

During the April 1, 2014 to March 31, 2015 reporting period, the City of Hokes Bluff completed eight (8) of the nine (9) Public Education and Outreach strategies identified in the previous Annual Report and continued work on the remaining one (1) strategy.

The City of Hokes Bluff promoted and planned to participate in Renew Our Rivers in April 2014; however the City was unable to participate because the cleanup was postponed due to forecast of severe weather and flood stage of the Coosa River. (Activity 3)

The City of Hokes Bluff also completed six (6) strategy beyond those proposed in the previous Annual Report. These strategies included:

- The City of Hokes Bluff purchase an advertisement within the Hokes Bluff High School Football Program (Activity 10)
- The City of Hokes Bluff provided a storm water challenge word search to the 4 graders (Activity 11)
- The City of Hokes Bluff purchased t-shirts and gave them to participants at Hokes Bluff City Fest (Activity 12)
- The City of Hokes Bluff maintains 12 “No Littering” signs within the City (Activity 13)
- The City of Hokes Bluff maintains 1 “Pet Waste Station” (Activity 14)

- The City of Hokes Bluff celebrates Earth Day reminding citizens to recognize the day by learning to conserve, recycle and avoid pollution (Activity 15)

A table identifying each Public Education and Outreach strategy planned for the 2014-2015 reporting period, a description of actions taken by the City of Hokes Bluff, and a brief description of activities planned for the next reporting period is provided in **Appendix H**. Supporting documentation is also included in **Appendix H**.

9.1.2 Proposed Activities for the April 1, 2015 to March 31, 2016 Reporting Period

The City will implement the following activities as part of their Public Education and Outreach Program during the 2015-2016 reporting period. To evaluate the success of the program and aid in preparing the required Annual Report, evaluation criteria have been established for each strategy.

Activity 1. Distribute Storm Water Educational Material

The City will distribute education materials to the approximately 500 households and businesses through inclusion in garbage collection bills. These materials will be distributed twice per year and will:

- Introduce the MS4 to the general public, and discuss the storm water cycle and how common contaminants enter the storm water system.
- Educate households and businesses about proper and improper use, storage, and disposal of common household chemicals such as herbicides, pesticides, and fertilizers.
- Make the public aware of how the improper use of these chemicals can impact storm water quality.
- Discuss how the cumulative effect of these contaminants impact the Coosa River and what individual households and businesses can do to reduce storm water pollutants.
- Provide information on additional resources pertaining to storm water, storm water pollution, and Neely Henry Lake TMDLs.
- Provide information on storm water contacts within the City of Hokes Bluff and information on reporting potential storm water violations.

Evaluation Criteria: The City will report the number of households who receive the mail-out during the reporting period. This information will indicate the number of people who received educational materials.

Activity 2. Maintain the Storm Water Webpage

The City will regularly update the Storm Water webpage on City of Hokes Bluff web site that was developed during the 2013-2014 reporting period. The webpage will:

- Include general information on the Gadsden-Etowah MS4;
- Discuss the storm water cycle and how common contaminants enter the storm water system;
- Provide links to related storm water resources;
- Provide contact information for reporting illicit discharges; and,
- Provide a calendar of upcoming community events related to storm water outreach.

Evaluation Criteria: The City will report what information was added to the webpage and the number of “hits” on the webpage. The City has an additional target of **150-200 contacts** for the reporting period. This information will indicate the number of people who view the webpage and the associated educational materials.

Activity 3. Partnerships in Educational and Public Involvement Events

The City will partner with Keep Etowah Beautiful, the Middle Coosa Watershed Project, and/or Alabama Power to distribute storm water educational material and promote events such as *Renew Our Rivers*, *Message in a Bottle*, and/or community cleanup days. The events will be advertised at the City Hall, Library, and other businesses. Promotion methods may include co-sponsoring radio, television, and/or print advertisement with co-permittees and other stakeholders. City personnel will participate in the events.

Evaluation Criteria: The City will report number of participants who received educational materials during the events and the ways in which the City promoted and/or advertised the events. This information will indicate the number of people who received educational materials and will help measure the public awareness of the events and degree of public participation.

Activity 4. Promote Water Quality Awareness Week

The City designated the second week of May as *Water Quality Awareness Week*. The City will promote the event through City resources including co-sponsoring radio, television, and print advertisement with co-permittees and other stakeholders.

Evaluation Criteria: The City will report activities associated with this event and the ways in which the City promoted / advertised *Water Quality Awareness Week*. This information will help measure the public awareness of the event and degree of public and City participation.

Activity 5. Coordinate and Promote an Annual Community Cleanup Day

The City will provide storm water outreach material and/or staff a display during the spring and fall community cleanup days. Annual community cleanup days are currently scheduled in 2015, in partnership with Keep Etowah Beautiful.

Pre-printed outreach material and/or displays may include:

- Introduction to the MS4 and the General Permit requirements;
- Discussion of the storm water cycle and how common contaminants enter the storm water system;
- Information on proper and improper use, storage, and disposal of common household chemicals;
- Information regarding the Neely Henry Lake TMDLs;
- Storm water contacts within the City and information on reporting potential storm water violations.

Evaluation Criteria: The City will report number of volunteers and the ways in which the event was promoted / advertised. This information will indicate the number of people who received educational materials and will help measure the public awareness of the event and degree of public participation.

Activity 6. Promote and Participate in the Etowah County Water Festival

The City will promote and participate in the annual *Etowah County Water Festival* through City resources. Promotion methods may include co-sponsoring radio, television, and/or print advertisement with co-permittees and other stakeholders. City personnel will participate in the events.

Evaluation Criteria: The City will report number of City volunteers at the event and the ways in which the City promoted and/or advertised the event. This information will indicate the City's participation and will help measure the public awareness of the event and degree of public and City participation.

Activity 7. Partner with NRCS

The City will partner with the Etowah County NRCS to educate agricultural land users within the MS4 boundary by distributing education materials or staffing a display at an NRCS event. The educational materials may include:

- How agricultural runoff contributes to the Lake Neely Henry organic enrichment and excess nutrient loading;
- Available Environmental Quality Incentives Programs;
- Best Management Practices for reducing nutrient and sediment runoff.

Evaluation Criteria: The City will report how they partnered with the NRCS. The City will also, where applicable, report the number of volunteers, the ways in which the event was promoted / advertised, and the number of educational materials that were provided. This information will help measure the public awareness of the event and degree of public participation.

Activity 8. Provide Information on Construction Site Storm Water Impacts
Ordinance HB-2012-002, Section 4 provides for BMP Plan review when applying for a Land Disturbance Permit. The City will continue to educate engineers, developers, and contractors through plan review and permitting of new construction and development.

The City will provide pre-printed information on how construction site runoff can impact storm water quality to individuals requesting plan review and building/development permits.

Evaluation Criteria: The City will report the number of permits issued during the reporting period. This information will indicate the number of people who received educational materials.

Activity 9. Gadsden-Etowah MS4 Steering Committee Meetings
The City will coordinate and/or participate in quarterly meetings of the Stormwater Steering Committee for entity updates, networking, and coordination of activities and BMP strategies.

Evaluation Criteria: The City will provide meeting agenda's during the reporting period. The City will keep attendance records. This information will indicate the participation of the steering committee and their interest in networking and coordination of activities.

9.1.3 Changes

The City of Hokes Bluff requests no changes to the Public Education and Outreach strategies identified in the 2012 SWMP.

9.1.4 Responsible Party

The Hokes Bluff City Clerk will be responsible for coordinating the Public Education and Outreach efforts.

9.2 Public Involvement and Participation

9.2.1 2014 to 2015 Implementation Status

During the April 1, 2014 to March 31, 2015 reporting period, the City of Hokes Bluff completed five (5) of the seven (7) Public Involvement and Participation strategies identified in the previous Annual Report and continued work on the remaining two (2) strategies.

The City of Hokes Bluff along with the Gadsden-Etowah Steering Committee scheduled a Second Annual MS4 Conference again February 25, 2015; however due to inclement weather forecast the conference was postponed two days before the conference. The County received 8 inches of snow that day. The Conference has been rescheduled for April 15, 2015 (Activity 1).

The City of Hokes Bluff promoted and planned to participate in Renew Our Rivers in April 2014; however the City was unable to participate because the cleanup was postponed due to forecast of severe weather and flood stage of the Coosa River. (Activity 3)

The City of Hokes Bluff also completed four (4) strategy beyond those proposed in the previous Annual Report. These strategies included:

- The City of Hokes Bluff maintains the Ferry Landing and utilizes part time labor during the months of May through October to clean up the area (Activity 8)
- The City of Hokes Bluff maintains the Mill Pond Park and utilizes part time labor during the months of May through October to clean up the area (Activity 9)
- The City of Hokes Bluff celebrates Earth Day reminding citizens to recognize the day by learning to conserve, recycle and avoid pollution (Activity 10)
- The City of Hokes Bluff provided dumpsters for disposal of extra garbage (Activity 11)

A table identifying each Public Involvement and Participation strategy planned for the 2014-2015 reporting period, a description of actions taken by the City of Hokes Bluff, and a description of activities planned for the next reporting period is provided in **Appendix H**. Supporting documentation is also included in **Appendix H**.

9.2.2 Proposed Activities for the April 1, 2015 to March 31, 2016 Reporting Period

The City will implement the following activities as part of their Public Involvement and Participation Program during the 2015-2016 reporting period. To evaluate the success of the program and aid in preparing the required Annual Report, evaluation criteria have been established for each strategy.

Activity 1. Storm Water Conference/Public Meeting

The City will develop and coordinate an annual Storm Water Conference/Public Meeting for local businesses and residents. The second annual MS4 conference is currently scheduled for April 15, 2015. The City will develop and coordinate a third annual MS4 conference in 2015 or 2016.

This will be a joint outreach effort with all co-permittees participating. The agenda may include general information on the Gadsden-Etowah MS4, presentations pertaining to how common contaminants enter the storm water system, and presentations by key stakeholders such as the ADEM, Natural Resources and Conservation Service, and Clean Water Partnership. The purpose of the conference/meeting will be to encourage public participation and input into the storm water management program.

Evaluation Criteria: The City will report the number of conference attendees and provide a copy of the agenda to demonstrate the focus of the conference. This information will help measure the degree of public education and involvement.

Activity 2. Partnerships in Educational and Public Involvement Events

Participate in and promote annual programs associated with the Coosa Basin Clean Water Partnership, Keep Etowah Beautiful, the Middle Coosa Watershed Project, and/or Alabama Power such as *Renew Our Rivers*, *Message in a Bottle*, and/or community cleanup days. Promotion methods may include co-sponsoring radio, television, and/or print advertisement with co-permittees and other stakeholders. City personnel will participate in the events.

Evaluation Criteria: The City will report number of City volunteers at the events and the ways in which the City promoted / advertised the event. This information will help measure the public awareness of the event and degree of public and City participation.

Activity 3. Promote and Participate in Renew Our Rivers

The City will participate in and promote the *Renew Our Rivers* program in the **Fall of 2014**. Promotion methods may include co-sponsoring radio, television, and/or print advertisement with co-permittees and other stakeholders. City personnel will participate in the event.

Evaluation Criteria: The City will report the number of City volunteers at the event and the ways in which the City promoted and/or advertised the event. This information will indicate the number of people who received educational materials and will help measure the public awareness of the event and degree of public participation.

Activity 4. Coordinate and Promote an Annual Community Cleanup Day

In addition to the *Renew our Rivers* program, the City will coordinate and promote an annual community cleanup day in **2015** targeting secondary waterways and primary contributing watersheds. Promotion methods may include

co-sponsoring radio, television, and/or print advertisement with co-permittees and other stakeholders. City personnel will participate in the event.

Evaluation Criteria: The City will report number of volunteers and the ways in which the event was promoted and/or advertised. This information will indicate the number of people who received educational materials and will help measure the public awareness of the event and degree of public participation.

Activity 5. Promote and Participate in the Etowah County Water Festival

The City will promote and participate in the annual *Etowah County Water Festival* through City resources. Promotion methods may include co-sponsoring radio, television, and/or print advertisement with co-permittees and other stakeholders. City personnel will participate in the festival.

Evaluation Criteria: The City will report number of City volunteers at the event and the ways in which the City promoted and/or advertised the event. This information will indicate the City's participation and will help measure the public awareness of the event and degree of public and City participation.

Activity 6. Public Reporting and Tracking System

An electronic report form specifically for storm water was added to the Hokes Bluff website and Storm Water webpage during the 2013-2014 reporting period for the public to report non-compliant construction sites, illicit discharges (including spills or illegal dumping), impaired waterways, and violations of ordinances relating to storm water pollution. The City will evaluate the current public reporting and tracking methods.

The City will continue to track received complaints and the City's responses to the received complaints.

Evaluation Criteria: The City will report the total number of complaints received, the number of complaints addressed, and the number of complaints resolved during the reporting period. The City will also report whether or not the received reports contain the required information to find and address the suspected problem. The City will provide a summary of at least one complaint received during the reporting period. This information will help measure the effectiveness of the reporting system, as well as the public awareness and concern of storm water issues.

Activity 7. Evaluate Comment and Feedback Methods

The City currently provides a contact number on the Storm Water webpage, developed during the 2013-2014 reporting period, for members of the public to

provide comments on the MS4 program, feedback on the public outreach efforts, and suggestions for improvement to the program. The City will evaluate the current comment and feedback methods.

Evaluation Criteria: The City will report the total number of comments received from the public.

9.2.3 Changes

The City of Hokes Bluff requests no changes to the Public Involvement and Participation strategies identified in the 2012 SWMP.

9.2.4 Responsible Party

The Hokes Bluff City Clerk will be responsible for coordinating the Public Involvement and Participation efforts.

9.3 Illicit Discharge Detection and Elimination

9.3.1 2014 to 2015 Implementation Status

During the April 1, 2014 to March 31, 2015 reporting period, the City of Hokes Bluff completed eighteen (18) of the eighteen (18) Illicit Discharge Detection and Elimination strategies identified in the previous Annual Report.

A table identifying each Illicit Discharge Detection and Elimination strategy planned for the 2014-2015 reporting period, a description of actions taken by the City of Hokes Bluff, and a description of activities planned for the next reporting period is provided in **Appendix G**. Supporting documentation is also included in **Appendix G**.

9.3.2 Proposed Activities for the April 1, 2015 to March 31, 2016 Reporting Period

The City will implement the following activities as part of their Illicit Discharge Detection and Elimination Program during the 2015-2016 reporting period. To evaluate the success of the program and aid in preparing the required Annual Report, evaluation criteria have been established for each strategy.

The City contracted S&ME, Inc. to assist in the implementation of this control measure. However, the City will be responsible for the completion of these activities, whether through City resources or an outside contractor, and for reporting the required evaluation criteria to ADEM.

Identifying Priority Areas

Activity 1. Identify Priority Areas

The City delineated drainage basins in the 2014-2015 reporting period. The City will then re-evaluate the drainage basins by **April 30, 2015** to determine the Priority Areas for the 2015-2016 reporting period. Priority Areas will be identified using the illicit discharge potential (IDP) calculation procedures detailed in Section 3 of the IDDE Program. The City will maintain records of the IDP calculations for each drainage basin.

Evaluation Criteria: The City will report the total IDP score for each drainage basin and will provide an updated map showing the identified Priority Areas. The City will report drainage basins that are newly listed or de-listed from the previous reporting year's calculations.

Field Assessment Activities

Activity 2. Outfall Identification

The City will implement a stream-walking program designed to identify previously unknown outfalls to the MS4. The City also plans to map a portion of the waterbodies that receive discharge from the MS4 during the reporting period. The implementation process is detailed in Section 4 of the IDDE Program.

Evaluation Criteria: The City will maintain records of field observations. The City will report the number of outfalls identified and the stream length walked during the reporting period. The City will provide updated tables and maps that include the outfalls identified by the stream-walking program.

Activity 3. Probable Outfall Verification

Probable outfalls may be identified during mapping activities, during review of proposed development plans, or through illicit discharge reports. When a probable outfall is identified, it will be added to the Storm Water System Map and labeled as unverified.

The City will verify probable outfalls through field observation within 18 months of their addition to the Storm Water System Map. The implementation process is detailed in Section 4 of the IDDE Program.

Evaluation Criteria: The City will report the number of probable outfalls that were identified and the number of outfalls that were verified during the reporting period. The City will provide updated tables and maps that include the verified

outfalls, as well as probable outfalls that are planned to be verified in the following reporting period. The City will maintain records of field observations.

Activity 4. Outfall Reconnaissance Inventory

During the reporting period, the City or subcontracted crews will conduct dry weather monitoring of major outfalls in Priority Areas. The City will also inspect a portion of the outfalls located outside Priority Areas. The implementation process is detailed in Section 7 of the IDDE Program.

Evaluation Criteria: The City will maintain records of field observations. The City will report the number of outfalls inspected during the reporting period. The City will also provide a summary of the results of outfall reconnaissance inventory activities conducted during the reporting period.

Activity 5. Suspect Discharge Sampling

If a dry weather flow has a severity index of 3 on one or more indicators in Section 4 of the Outfall Reconnaissance Inventory Field Sheet, or if field screening indicates a suspect discharge, field crews will collect samples for further analysis. The implementation process is detailed in Section 7 of the IDDE Program.

Evaluation Criteria: The City will report the number of identified dry weather flows, suspect discharges, and samples collected during the reporting period. The City will report the analysis results for the collected samples. The City will report if the suspect discharge was confirmed to be an illicit discharge and, if known, the type of illicit discharge.

IDDE Investigation

Activity 6. Outfall Ranking

Data from each Outfall Reconnaissance Inventory Field Sheet will be analyzed to characterize the observed outfall as having obvious, suspect, possible, or unlikely discharge potential. Obvious and suspect illicit discharges will be investigated within 10 and 30 days, respectively. Potential illicit discharges will be investigated within 60 days. The implementation process is detailed in Section 7 of the IDDE Program.

Evaluation Criteria: The City will report the ranking of each outfall inspected during the reporting period. The City will report the number of outfalls that required further investigation.

Activity 7. Discharge Investigation

Illicit discharge investigations will be performed to determine the source of a discharge problem. The implementation process is detailed in Section 7 of the IDDE Program.

Evaluation Criteria: The City will report the number of illicit discharge investigations performed during the reporting period. The City will also report the number of confirmed illicit discharges, if a source was determined, and if the discharge was eliminated.

Corrective Action Record Keeping

Activity 8. Corrective Action Record Keeping

When a suspect illicit discharge or illicit connection is identified, a case log detailing pertinent information will be created. Throughout the problem investigation and corrective action activities, all information related to the incident or property in question will be documented in the case log.

Evaluation Criteria: The City will maintain records of the correction actions. The City will report the number of confirmed illicit discharges and the number of illicit discharges corrected or eliminated during the reporting period. The City will also report the number of confirmed illicit discharges where corrective action is pending.

Storm Water System Mapping

Activity 9. Create Storm Water System Map – Existing Features

The City establish a digital format Storm Water System Map that can be updated as needed during the 2014-2015 reporting period. The City will continue to expand the existing Storm Water System Map to include:

- The location of all outfalls (to include latitude and longitude) and the names and location of all waters of the State that receive discharges from those outfalls;
- Structural BMPs owned, operated, and maintained within the City limits;
- An update of known connections to the MS4 authorized or allowed by the City;
- Any geographic areas which may discharge storm water into the MS4, which may not be located within the municipal boundary;
- Identification and location of waterways within the City including detention ponds, streams, and ditches;

Evaluation Criteria: The City will provide an updated Storm Water System Map showing the features added during the reporting period.

Activity 10. Update Storm Water System Map – Future Additions

Once a digital mapping format is established, proposed additions within the City, including new storm sewer and drainage ditches, will be mapped based on the civil plans provided to the City or digitized by the City. Outfalls from proposed development will be verified after construction is complete, as part of Activity 3. The implementation process is further discussed in Section 5 of the IDDE Program.

Evaluation Criteria: The City will report the number of civil plans provided to the City and the number of verified new features or outfalls during the reporting period. The City will provide an updated Storm Water System Map showing the features added during the reporting period.

Illicit Discharge Ordinance

Activity 11. Evaluate IDDE Ordinance

City of Hokes Bluff will evaluate the effectiveness of Section 11 by **December 31, 2015**. If updates are required, the City will amend the existing ordinance or prepare a new ordinance.

Evaluation Criteria: The ordinance will be evaluated on its effectiveness in addressing identified illicit discharges and preventing repeat offenders. The City will report the number of complaints received, number of illicit discharges identified during the reporting period, the number of resolved violations, the number of repeat offenders, and the number of enforcement actions taken.

IDDE Public Education

Activity 12. Distribute Storm Water Educational Material

The City will provide flyers to the public highlighting the identification of illicit discharges and documenting the illicit discharge reporting process. The flyers will be provided at the library, community center, and City Hall. Information on illicit discharge identification and reporting will also be provided on the storm water webpage.

Evaluation Criteria: The City will report the number of materials placed at the library, community center, and City Hall and how often the materials were replaced during the reporting period. This information will indicate the number of people who received educational materials.

Activity 13. Public Reporting and Tracking System

An electronic report form specifically for storm water was added to Hokes Bluff website and Storm Water webpage during the 2013-2014 reporting period for the public to report illicit discharges (including spills or illegal dumping). The City will evaluate the current public reporting and tracking methods.

The City will continue to track received complaints and the City's responses to the received complaints.

Evaluation Criteria: The City will report the total number of complaints received, the number of complaints addressed, and the number of complaints resolved during the reporting period. The City will also report whether or not the received reports contain the required information to find and address the suspected problem. The City will provide a summary of at least one complaint received during the reporting period. This information will help measure the effectiveness of the reporting system, as well as the public awareness and concern of storm water issues.

Activity 14. Municipal Training

Municipal workers will be trained in the identification of illicit discharges as well as the prevention of storm water pollution at municipal facilities or related to municipal activities. Specific municipal operations such as fueling, vehicle maintenance, vehicle washing, paint and paint waste storage and disposal, and used oil disposal may be addressed. The next training session will be conducted by **March 31, 2016**.

Municipal workers will be notified of the procedures for reporting suspected illicit discharges to Lisa Johnson, the City IDDE Program Manager, including the preferred method of contact (email) and the information to be included in the report (e.g., location, date, time, observations).

Evaluation Criteria: The City will provide details on the training topics presented to the municipal workers. The City will maintain attendance records and report the number of municipal workers trained during the reporting period. This information will help measure the municipal workers awareness of illicit discharges and storm water issues.

Storm Water Monitoring

Activity 15. Storm Water Monitoring Locations

Storm water monitoring locations were identified in the 2012 SWMP and were revised in January 2014. Once a digital mapping format is established, The City will add these locations to the Storm Water System Map.

If additional storm water monitoring points are recommended as a result of the analysis of the monitoring data, the City will update the map with the revised or additional locations.

Evaluation Criteria: The City will provide an updated Storm Water System Map showing the features added during the reporting period.

Activity 16. Evaluation of Monitoring Data

In conjunction with the monitoring provisions of Section 2.2 of the SWMP, the City of Hokes Bluff will evaluate the collected monitoring data for indicators of potential illicit discharges within the City and to assess the effectiveness of the BMPs in achieving the 2008 TMDL.

Evaluation Criteria: The City will report which monitoring points appear to have relatively higher pollutant loads. The City will make recommendations to the Gadsden-Etowah MS4 Storm Water Steering Committee to add and/or modify monitoring points to better characterize discharges from the MS4.

NPDES Industrial Permitting

Activity 17. As authorized by the Clean Water Act, the NPDES Permit program controls water pollution by regulating point sources that discharge pollutants into waters of the United States. Title 40, Part 122 of the Code of Federal Regulations (40CFR122) specifies that discharges associated with certain industrial activities must obtain an NPDES permit. The ADEM currently provides for individual and general NPDES permitting.

Information pertaining to permitted facilities will be obtained from available public sources such as MYWATERS Mapping, EPA ECHO Database, and ADEM E-file and incorporated into the Storm Water System Map. This information will be used in conjunction with the storm water system mapping and monitoring data to evaluate potential sources of storm water pollution and to identify unpermitted facilities.

Unpermitted facilities that require an NPDES permit will be reported to the Industrial Section of the ADEM. The City of Hokes Bluff continues to rely on the ADEM for industrial NPDES permitting and enforcement.

Evaluation Criteria: The City will provide the number of permitted facilities reported to ADEM during the reporting period, if any. This information will help measure the effectiveness of the land use evaluations.

9.3.3 Changes

The City of Hokes Bluff requests no changes to the Illicit Discharge Detection and Elimination strategies identified in the 2012 SWMP.

9.3.4 Responsible Party

The Hokes Bluff City Clerk will be responsible for overseeing, coordinating, and enforcing the IDDE program in the City of Hokes Bluff regulated MS4 area.

9.4 Construction Site Storm Water Runoff

9.4.1 2014 to 2015 Implementation Status

During the April 1, 2014 to March 31, 2015 reporting period, the City of Hokes Bluff completed seven (7) of the seven (7) Construction Site Storm Water Runoff strategies identified in the previous Annual Report and began work on two (2).

A table identifying each Construction Site Storm Water Runoff strategy planned for the 2014-2015 reporting period, a description of actions taken by the City of Hokes Bluff, and a description of activities planned for the next reporting period is provided in **Appendix G**. Supporting documentation is also included in **Appendix G**.

9.4.2 Proposed Activities for the April 1, 2015 to March 31, 2016 Reporting Period

The City will implement the following activities as part of their Construction Site Storm Water Runoff Program during the 2015-2016 reporting period. To evaluate the success of the program and aid in preparing the required Annual Report, evaluation criteria have been established for each strategy.

Activity 1. Erosion and Sediment Control Ordinance

Ordinance HB-2012-002 was implemented with an effective date of December 11, 2012.

The City will evaluate the effectiveness of the ordinance by **December 31, 2015**. If changes are warranted, a new or revised ordinance will be approved and implemented.

Evaluation Criteria: The ordinance will be evaluated on its effectiveness in addressing erosion and sediment control. The City will report the number of non-compliant construction sites identified by the City, the number of enforcement actions taken, the number of non-compliant sites reported to the ADEM, and whether the individuals or businesses responsible for identified non-compliant construction sites are repeat offenders.

Activity 2. Construction Site Inspection Program

Designated City personnel will inspect all qualifying construction sites within 60 days of initial disturbance, at periodic intervals during construction, and following stabilization. The City Inspector performs the necessary inspections.

The City will create an inspection form or a checklist for the City Inspector to include with each permit.

The City will evaluate the effectiveness of the construction site inspection program **by December 31, 2015.**

Evaluation Criteria: The City will report the number of inspections completed, the number of non-compliant construction sites identified by the City, the number of enforcement actions taken, the number of non-compliant sites reported to the ADEM, and whether the individuals or business responsible for identified non-compliant construction sites are repeat offenders. The City will also provide a summary of at least one inspection conducted during the reporting period that resulted in enforcement actions.

Activity 3. BMP Training Program

City personnel tasked with plan review and/or conducting BMP inspections will undergo annual training on proper design, installation, inspection, and maintenance of on-site control measures and on new technology and practices. All inspectors will complete initial storm water awareness training and attend annual refreshers.

The City inspector will attend QCI training. QCI certification will be maintained through the approved annual refresher courses. Should additional inspectors be needed, they will be trained accordingly.

Evaluation Criteria: The City will provide a copy of the QCI certificates and records of awareness training received during the reporting period.

Activity 4. Sediment and Erosion Control Plan Review

The City will continue to review Sediment and Erosion Control Plans and Storm Water Management Plans for all new construction, prior to the approval or denial of a land disturbance permit application.

Plan review will ensure proposed projects adequately address the City erosion, sediment, and pollution control requirements. Plan review will also take into consideration what potential impacts to water quality the project may have.

Evaluation Criteria: The City will report the total number of plans reviewed, the number of plans approved or rejected during the reporting period, and number of plans that meet the requirements the Alabama Construction General Permit.

Activity 5. Public Reporting and Tracking

An electronic report form specifically for storm water was added to Hokes Bluff website and Storm Water webpage during the 2013-2014 reporting period for the public to report non-compliant construction sites. The general public may also provide anonymous information regarding erosion and sediment control concerns to the City by phone. The City will evaluate the current public reporting and tracking methods.

The City will continue to track received complaints and the City's responses to the received complaints.

Evaluation Criteria: The City will report the total number of complaints received, the number of addressed complaints, and the number of resolved complaints during the reporting period. The City will also report whether or not the received reports contain the required information to find and address the suspected problem. The City will provide a summary of at least one complaint received during the reporting period. This information will help measure the effectiveness of the reporting system, as well as the public awareness and concern regarding construction storm water issues.

Activity 6. Public Reporting and Tracking

The City will publicize the online and telephone reporting methods in the hardcopy outreach material on the educational material provided to people requesting building and development permits.

Evaluation Criteria: The City will report the total number of permits issued and/or request during the reporting period.

Activity 7. Notify ADEM of Non-Compliant Sites

The City will notify the ADEM of any construction sites where a possible violation of the Clean Water Act has occurred. Possible violations may include, but are not limited to, releases of sediment to a water of the State or failure to initiate corrective actions following an inspection by the City.

The City of Hokes Bluff continues to rely on the ADEM for construction NPDES enforcement.

Evaluation Criteria: The City will report the total number of non-compliant construction sites reported to ADEM during the reporting period.

9.4.3 Changes

The City of Hokes Bluff requests no changes to the Construction Site Storm Water Runoff strategies identified in the 2012 SWMP.

9.4.4 Responsible Party

The Hokes Bluff City Inspector is responsible for implementing the provisions of Ordinance HB-2012-002 and maintaining records of implementation actions. The Hokes Bluff City Clerk is responsible for coordinating the evaluations required for the Annual Report.

9.5 Post-Construction Storm Water Management

9.5.1 2014 to 2015 Implementation Status

During the April 1, 2014 to March 31, 2015 reporting period, the City of Hokes Bluff completed three (3) of the four (4) Post-Construction Storm Water Management strategies identified in the previous Annual Report and began working on the remaining one (1) strategy.

The City of Hokes Bluff is reviewing and evaluating policies and ordinances related to building codes, or other local regulations, with a goal of identifying regulatory and policy impediments to the installation of green infrastructure and low-impact development techniques. A final evaluation has not been determined at this time (Activity 4).

A table identifying each Post-Construction Storm Water Management strategy planned for the 2014-2015 reporting period, a description of actions taken by the City of Hokes Bluff, and a description of activities planned for the next reporting period is provided in **Appendix G**. Supporting documentation is also included in **Appendix G**.

9.5.2 Proposed Activities for the April 1, 2015 to March 31, 2016 Reporting Period

The City will implement the following activities as part of their Post-Construction Storm Water Management Program during the 2015-2016 reporting period. To evaluate the success of the

program and aid in preparing the required Annual Report, evaluation criteria have been established for each strategy.

Activity 1. Reducing Post Construction Runoff Volume

Ordinance HB-2012-002, Section 7 requires post-construction storm water management measures to reduce runoff volume. Section 7.2 requires the submission of Post-Construction Strategies for City approval, either with the BMP Plan or separately. Section 7.3 requires the submission of as-built drawings to the City.

The ordinance will be evaluated by **December 31, 2015**. If changes are warranted, a new or revised ordinance will be approved and implemented.

Evaluation Criteria: The ordinance will be evaluated on its effectiveness in reducing runoff from new development or redevelopment. The City will report the number of submitted plans that include measures to reduce runoff volume and the number of enforcement actions taken. The evaluation may also examine which control measures are typically utilized and if additional examples should be added to the ordinance.

Activity 2. Reducing Pollutants from Development

Section 8.5 of Ordinance HB-2012-002 requires that requires that pollutants in runoff water be minimized using appropriate BMPs.

The ordinance will be evaluated by **December 31, 2015**. If changes are warranted, a new or revised ordinance will be approved and implemented.

Evaluation Criteria: The ordinance will be evaluated on its effectiveness in reducing pollutants in runoff from new development or redevelopment. The evaluation may also examine which control measures are typically utilized and if examples of appropriate control measures should be added to the ordinance. The City will report the number of developments where treatment of storm water runoff is required and the criteria for requiring treatment of storm water runoff.

Activity 3. Long-Term Maintenance of Storm Water Controls

Ordinance HB-2012-002, Section 7.5 provides for inspections of implemented Post-Construction Strategies and allows the City to require documentation allocating responsibilities for long-term operation and maintenance, as it deems necessary. The City may also require that a method of funding be established or provided to ensure the long-term maintenance of post-construction BMPs.

The ordinance will be evaluated by **December 31, 2015**. If changes are warranted, a new or revised ordinance will be approved and implemented.

Evaluation Criteria: The ordinance will be evaluated on its effectiveness in addressing long-term maintenance of storm water controls. The City will report the number of submitted plans that include detailed maintenance procedures, the number of maintenance agreements reviewed, the number of maintenance provisions approved or denied, and the number of enforcement actions taken.

Activity 4. Evaluate Obstacles to Low Impact/Green Development

The City will review and evaluate policies and ordinances related to building codes, or other local regulations, with a goal of identifying regulatory and policy impediments to the installation of green infrastructure and low-impact development techniques.

Evaluation Criteria: The City will report if obstacles are identified and provide a brief summary on how the conflicts will be resolved.

9.5.3 Changes

The City of Hokes Bluff requests no changes to the Post-Construction Storm Water Management strategies identified in the 2012 SWMP.

9.5.4 Responsible Party

The Hokes Bluff City Inspector is responsible for implementing the provisions of Ordinance HB-2012-002 and maintaining records of implementation actions. The Hokes Bluff City Clerk is responsible for coordinating the evaluations required for the Annual Report.

9.6 Pollution Prevention and Good Housekeeping for Municipal Operations

9.6.1 2014 to 2015 Implementation Status

During the April 1, 2014 to March 31, 2015 reporting period, the City of Hokes Bluff completed three (3) of the three (3) Pollution Prevention and Good Housekeeping for Municipal Operations strategies identified in the previous Annual Report.

The City of Hokes Bluff completed ten (10) strategies beyond those proposed in the previous Annual Report. These strategies include:

- The City of Hokes Bluff provided brush pick-up throughout the City (Activity 4)
- The City of Hokes Bluff maintains the Ferry Landing and utilizes part time labor (Activity 5)
- The City of Hokes Bluff maintains the Mill Pond Park and utilizes part time labor (Activity 6)

- The Sheriff's department cleans hwy 278 and County Road 71 every other month (Activity 7)
- The City of Hokes Bluff maintains 12 "No Littering" Signs within the City (Activity 8)
- The City of Hokes Bluff maintains 1 "Pet Waste Stations" (Activity 9)
- The City of Hokes Bluff allows the public to drop off used oil for recycling at City Shop (Activity 10)
- The City of Hokes Bluff allows the public to drop off metal for recycling at City Shop (Activity 11)
- Two council members of the City of Hokes Bluff attended a Grant Recycling Workshop on October 22, 2014 (Activity 12)

A table identifying each Pollution Prevention and Good Housekeeping for Municipal Operations strategy planned for the 2014-2015 reporting period, a description of actions taken by the City of Hokes Bluff, and a description of activities planned for the next reporting period is provided in **Appendix G**. Supporting documentation is also included in **Appendix G**.

9.6.2 Proposed Activities for the April 1, 2015 to March 31, 2016 Reporting Period

The City will implement the following activities as part of their Pollution Prevention and Good Housekeeping for Municipal Operations Program during the 2015-201 reporting period. To evaluate the success of the program and aid in preparing the required Annual Report, evaluation criteria have been established for each strategy.

Activity 1. Employee Training

The City will continue to implement a training program for municipal employees that focus on pollution prevention, good housekeeping measures, identification of potential illicit discharges, and other potential threats to storm water quality.

The next training session will be conducted by **March 31, 2015**.

Evaluation Criteria: The City will provide details on the training topics presented to municipal workers during the reporting period. The City will keep attendance records and report the number of municipal workers trained during the reporting period. This information will help measure the municipal workers awareness of storm water issues.

Activity 2. Vehicle Maintenance Program

The City developed an inspection checklist for municipal equipment during the 2013-2014 reporting period. DOT inspection checklists are completed weekly. Monthly logs of vehicle and equipment maintenance began January 1, 2013.

The City will continue to conduct routine maintenance of owned vehicles and will inspect vehicles for the presence of fluid leaks during routine maintenance. The City will promptly repair vehicles determined to have leaks.

Evaluation Criteria: The City will provide a completed inspection log for at least one vehicle used during the reporting period. The City will report the frequency of inspections and the number of vehicle or equipment leaks identified during the reporting period as a result of the inspection program. This information will help measure the effectiveness of the vehicle inspection and maintenance program.

Activity 3. Vehicle Wash Areas

A specified area for vehicle washing has been established for each department. Each department location will be reviewed, inspected, and modified as needed throughout the year. During the annual BMP training, the City will notify all employees of the locations of the designated wash areas.

The City discontinued use of phosphate-containing soaps at the City/Utility Shop. Where possible, the City will discontinue use of phosphate-containing soaps for vehicle washing (unless washing takes place at an NPDES-permitted facility), and will incorporate non-phosphatic detergents in wash procedures.

Evaluation Criteria: The City will report the number of designated municipal vehicle washing areas. The City will also keep attendance records and report the number of municipal workers trained during the reporting period. This information will help measure the municipal workers awareness of storm water issues.

9.6.3 Changes

The City of Hokes Bluff requests no changes to the Pollution Prevention and Good Housekeeping for Municipal Operations strategies identified in the 2012 SWMP.

9.6.4 Responsible Party

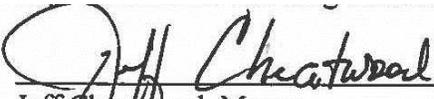
The Hokes Bluff City Clerk is responsible for implementing pollution prevention and good housekeeping within municipal operations.

9.7 Agency Certification

This SWMP is produced jointly by the eight jurisdictions comprising the Gadsden-Etowah Phase II Small Municipal Separate Storm Sewer System. Implementation of the minimum control measures applicable to each jurisdiction is the responsibility of the individual jurisdiction.

Implementation of the storm water monitoring component of the Storm Water Management Program is a joint responsibility of all jurisdictions.

I certify under penalty of law that this document and all attachments pertaining to the City of Hokes Bluff were prepared under my directions or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated 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 or imprisonment for knowing violations.



Jeff Chearwood, Mayor
City of Hokes Bluff, Alabama

3-24-2015
Date

10. CITY OF ATTALLA

The City of Attalla encompasses approximately 7.5% of the Urbanized Area and accounts for approximately 9% of the population.

In accordance with Part III.B of the NPDES General Permit, the 2012 Storm Water Management Program detailed the specific activities the City of Attalla planned to undertake regarding the following six minimum control measures:

1. Public Education and Outreach on Storm Water Impacts
2. Public Involvement/Participation
3. Illicit Discharge Detection and Elimination (IDDE)
4. Construction Site Storm Water Runoff Control
5. Post-Construction Storm Water Management in New Development and Redevelopment
6. Pollution Prevention/Good Housekeeping for Municipal Operations

The following sections detail the current implementation status of each minimum control measure, activities conducted during the current reporting period, planned activities for the upcoming reporting period, requested changes to the provisions of the 2012 SWMP, and the party responsible for implementing each minimum control measure.

10.1 Public Education and Outreach

10.1.1 2014 to 2015 Implementation Status

During the April 1, 2014 to March 31, 2015 reporting period, the City of Attalla completed four (4) of the five (5) Public Education and Outreach strategies identified in the previous Annual Report and began work on the remaining one (1) strategy.

City of Attalla did not mail out educational materials; however the City placed educational materials on the bulletin board in the library and city hall (Activity 3)

A table identifying each Public Education and Outreach strategy planned for the 2014-2015 reporting period, a description of actions taken by the City of Attalla, and a description of activities planned for the next reporting period is provided in **Appendix I**. Supporting documentation is also included in **Appendix I**.

10.1.2 Proposed Activities for the April 1, 2015 to March 31, 2016 Reporting Period

The City will implement the following activities as part of their Public Education and Outreach Program during the 2015-2016 reporting period. To evaluate the success of the program and aid in preparing the required Annual Report, evaluation criteria have been established for each strategy.

Activity 1. Distribute Storm Water Educational Material

The City will distribute storm water education material at the City Hall and the Library. Topics will include the following:

- Introduce the MS4 to the general public and discuss the storm water cycle and how common contaminants enter the storm water system.
- Educate households and businesses about proper and improper use, storage, and disposal of common household chemicals such as herbicides, pesticides, and fertilizers.
- Make the public aware of how the improper use of these chemicals can impact storm water quality.
- Discuss how the cumulative effect of these contaminants impact the Coosa River and what individual households and businesses can do to reduce storm water pollutants.
- Provide information on additional resources pertaining to storm water, storm water pollution, and Neely Henry Lake TMDLs.
- Provide information on storm water contacts within the City of Attalla and information on reporting potential storm water violations.

Evaluation Criteria: The City will report the number of materials placed at the City Hall and Library and how often the materials were replaced during the reporting period. This information will indicate the number of people who received educational materials.

Activity 2. Maintain the Storm Water Webpage

The City will maintain the storm water webpage added to the City of Attalla website during the 2013-2014 reporting period. Participation will be tracked through the number of “hits” on the webpage. The webpage will:

- Include general information on the Gadsden-Etowah MS4;
- Discuss the storm water cycle and how common contaminants enter the storm water system;
- Provide educational materials about proper and improper use, storage, and disposal of common household chemicals;
- Provide links to related storm water resources;
- Provide contact information for reporting illicit discharges; and,
- Provide a calendar of upcoming community events related to storm water outreach.

Evaluation Criteria: The City will report what information was added to the webpage and the number of “hits” on the webpage. The City has a target of **50**

contacts for the reporting period. This information will indicate the number of people who view the webpage and the associated educational materials.

Activity 3. Distribute Storm Water Educational Material

The City will develop and distribute storm water education material to households and businesses through a separate mail-out. The educational material will:

- Introduce the MS4 to the general public and discuss the storm water cycle and how common contaminants enter the storm water system.
- Introduction to the MS4 and the General Permit requirements;
- Discussion of the storm water cycle and how common contaminants enter the storm water system;
- Information on proper and improper use, storage, and disposal of common household chemicals;
- Information regarding the Neely Henry Lake TMDLs; and
- Storm water contacts within the City of Attalla and information on reporting potential storm water violations.

Evaluation Criteria: The City will report the number of households who receive the mail-out during the reporting period. This information will indicate the number of people who received educational materials.

Activity 4. Partnerships in Educational and Public Involvement Events

The City will partner with Keep Etowah Beautiful, the Middle Coosa Watershed Project, and/or Alabama Power to distribute storm water educational material and promote events such as *Renew Our Rivers*, *Message in a Bottle*, and/or community cleanup days. The events will be advertised at the City Hall, Library, and other businesses. Promotion methods may include co-sponsoring radio, television, and/or print advertisement with co-permittees and other stakeholders. City personnel will participate in the events.

Evaluation Criteria: The City will report number of participants who received educational materials during the events and the ways in which the City promoted and/or advertised the events. This information will indicate the number of people who received educational materials and will help measure the public awareness of the events and degree of public participation.

Activity 5. Promote and Participate in the Etowah County Water Festival

The City will promote and participate in the annual *Etowah County Water Festival* through City resources. Promotion methods may include co-sponsoring radio, television, and/or print advertisement with co-permittees and other stakeholders. City personnel will participate in the festival.

Evaluation Criteria: The City will report number of City volunteers at the event and the ways in which the City promoted and/or advertised the event. This information will indicate the City’s participation and will help measure the public awareness of the event and degree of public and City participation.

Activity 6. Gadsden-Etowah MS4 Steering Committee Meetings

The City will coordinate and/or participate in quarterly meetings of the Stormwater Steering Committee for entity updates, networking, and coordination of activities and BMP strategies.

Evaluation Criteria: The City will provide meeting agendas during the reporting period. The City will keep attendance records. This information will indicate the participation of the steering committee and their interest in networking and coordination of activities.

10.1.3 Changes

The City of Attalla requests no changes to the Public Involvement and Participation strategies identified in the 2012 SWMP.

10.1.4 Responsible Party

The City of Attalla Mayor’s office is responsible for overseeing, developing, and coordinating the Public Education and Outreach efforts.

10.2 Public Involvement and Participation

10.2.1 2014 to 2015 Implementation Status

During the April 1, 2014 to March 31, 2015 reporting period, the City of Attalla completed two (2) of the two (2) Public Involvement and Participation strategies identified in the previous Annual Report and began on the remaining two (2) strategies.

The City of Attalla along with the Gadsden-Etowah Steering Committee scheduled a Second Annual MS4 Conference again February 25, 2015; however due to inclement weather forecast the conference was postponed two days before the conference. The County received 8 inches of snow that day. The Conference has been rescheduled for April 15, 2015 (Activity 1).

The City of Attalla planned to participate in Renew Our Rivers in April 2014; however the City was unable to participate because the cleanup was postponed due to forecast of severe weather and flood stage of the Coosa River (Activity 4).

The City of Attalla also completed one (1) strategy beyond those proposed in the previous Annual Report. This strategy was:

- Mr. Jason Nicholson attended the "Nonpoint Source Conference" (Activity 6).

A table identifying each Public Involvement and Participation strategy planned for the 2014-2015 reporting period, a description of actions taken by the City of Attalla, and a description of activities planned for the next reporting period is provided in **Appendix I**. Supporting documentation is also included in **Appendix I**.

10.2.2 Proposed Activities for the April 1, 2015 to March 31, 2016 Reporting Period

The City will implement the following activities as part of their Public Involvement and Participation Program during the 2015-2016 reporting period. To evaluate the success of the program and aid in preparing the required Annual Report, evaluation criteria have been established for each strategy.

Activity 1. Storm Water Conference/Public Meeting

The City will develop and coordinate an annual Storm Water Conference/Public Meeting for local businesses and residents. The second annual MS4 conference is currently scheduled for April 15, 2015. The City will develop and coordinate a third annual MS4 conference in 2015 or 2016.

This will be a joint outreach effort with all co-permittees participating. The agenda may include general information on the Gadsden-Etowah MS4, presentations pertaining to how common contaminants enter the storm water system, and presentations by key stakeholders such as the ADEM, Natural Resources and Conservation Service, and Clean Water Partnership. The purpose of the conference/meeting will be to encourage public participation and input into the storm water management program.

Evaluation Criteria: The City will report the number of conference attendees and provide a copy of the agenda to demonstrate the focus of the conference. This information will help measure the degree of public education and involvement.

Activity 2. Public Reporting and Tracking System

The City currently provides a contact number for members of the public to report non-compliant construction sites, illicit discharges (including spills or illegal dumping), impaired waterways, and violations of ordinances relating to storm water pollution. A form was created in February 2014 to track the reports.

The City will continue to publicize the reporting number on the City of Attalla website. The City will evaluate the current public reporting and tracking methods.

The City will continue to track received complaints and the City's responses to the received complaints.

Evaluation Criteria: The City will report the total number of complaints received, the number of complaints addressed, and the number of complaints resolved during the reporting period. The City will also report whether or not the received reports contain the required information to find and address the suspected problem. The City will provide a summary of at least one complaint received during the reporting period. This information will help measure the effectiveness of the reporting system, as well as the public awareness and concern of storm water issues.

Activity 3. Promote and Participate in Renew Our Rivers

The City will participate in and promote the *Renew Our Rivers* program in the **November of 2015**. Promotion methods may include co-sponsoring radio, television, and/or print advertisement with co-permittees and other stakeholders. City personnel will participate in the event.

Evaluation Criteria: The City will report the number of City volunteers at the event and the ways in which the City promoted and/or advertised the event. This information will indicate the number of people who received educational materials and will help measure the public awareness of the event and degree of public participation.

Activity 4. Promote and Participate in the Etowah County Water Festival

The City will promote and participate in the annual *Etowah County Water Festival* through City resources. Promotion methods may include co-sponsoring radio, television, and/or print advertisement with co-permittees and other stakeholders. City personnel will participate in the festival.

Evaluation Criteria: The City will report number of City volunteers at the event and the ways in which the City promoted / advertised the event. This information will indicate the City's participation and will help measure the public awareness of the event and degree of public and City participation.

10.2.3 Changes

The City of Attalla requests no changes to the Public Involvement and Participation strategies identified in the 2012 SWMP.

10.2.4 Responsible Party

The City of Attalla Mayor's office is responsible for overseeing, developing, and coordinating the Public Involvement and Participation efforts.

10.3 Illicit Discharge Detection and Elimination

10.3.1 2014 to 2015 Implementation Status

During the April 1, 2014 to March 31, 2015 reporting period, the City of Attalla completed thirteen (13) of the seventeen (17) Illicit Discharge Detection and Elimination strategies identified in the previous Annual Report and began working on three (3) of the remaining strategies. The City failed to meet one (1) of the strategy identified in the previous Annual Report.

The City of Attalla did not delineated drainage basins within the MS4 boundary and did not perform IDP calculations for each basin (Activity 1).

The City of Attalla conducted inspections of the identified outfalls but did not document the observations (Activities 4, 5, and 6).

The City of Attalla also completed one (1) strategy beyond those proposed in the previous Annual Report. The strategy was:

- Jason Nicholson attended the "Nonpoint Source Conference" (Activity 18).

A table identifying each Illicit Discharge Detection and Elimination strategy planned for the 2014-2015 reporting period, a description of actions taken by the City of Attalla, and a description of activities planned for the next reporting period is provided in **Appendix I**. Supporting documentation is also included in **Appendix I**.

10.3.2 Proposed Activities for the April 1, 2015 to March 31, 2016 Reporting Period

The City will implement the following activities as part of their Illicit Discharge Detection and Elimination Program during the 2014-2015 reporting period. To evaluate the success of the program and aid in preparing the required Annual Report, evaluation criteria have been established for each strategy.

Identifying Priority Areas

Activity 1. Identify Priority Areas

The City will delineate drainage basins and identify Priority Areas for the 2015-2016 reporting period by **Summer 2015**. The City will then re-evaluate the drainage basins by **April 30, 2016** to determine the Priority Areas for the 2015-2016 reporting period. Priority Areas will be identified using the illicit discharge

potential (IDP) calculation procedures detailed in Section 3 of the IDDE Program. The City will maintain records of the IDP calculations for each drainage basin.

Evaluation Criteria: The City will report the total IDP score for each drainage basin and will provide an updated map showing the identified Priority Areas. The City will report drainage basins that are newly listed or de-listed from the previous reporting year's calculations.

Field Assessment Activities

Activity 2. **Outfall Identification**

The City will implement a stream-walking program designed to identify previously unknown outfalls to the MS4. The City also plans to map a portion of the waterbodies that receive discharge from the MS4 during the reporting period. The implementation process is detailed in Section 4 of the IDDE Program.

Evaluation Criteria: The City will maintain records of field observations. The City will report the number of outfalls identified and the stream length walked during the reporting period. The City will provide updated tables and maps that include the outfalls identified by the stream-walking program.

Activity 3. **Probable Outfall Verification**

Probable outfalls may be identified during mapping activities, during review of proposed development plans, or through illicit discharge reports. When a probable outfall is identified, it will be added to the Storm Sewer System Map and labeled as unverified.

The City will verify probable outfalls through field observation within 18 months of their addition to the Storm Sewer System Map. The implementation process is detailed in Section 4 of the IDDE Program.

Evaluation Criteria: The City will report the number of probable outfalls that were identified and the number of outfalls that were verified during the reporting period. The City will provide updated tables and maps that include the verified outfalls, as well as probable outfalls that are planned to be verified in the following reporting period. The City will maintain records of field observations.

Activity 4. **Outfall Reconnaissance Inventory**

During the reporting period, the City or subcontracted crews will conduct dry weather monitoring of major outfalls in Priority Areas. The City will also inspect a portion of the outfalls located outside Priority Areas. The implementation process is detailed in Section 7 of the IDDE Program.

Evaluation Criteria: The City will maintain records of field observations. The City will report the number of outfalls inspected during the reporting period. The City will also provide a summary of the results of outfall reconnaissance inventory activities conducted during the reporting period.

Activity 5. Suspect Discharge Sampling

If a dry weather flow has a severity index of 3 on one or more indicators in Section 4 of the Outfall Reconnaissance Inventory Field Sheet, or if field screening indicates a suspect discharge, field crews will collect samples for further analysis. The implementation process is detailed in Section 7 of the IDDE Program.

Evaluation Criteria: The City will report the number of identified dry weather flows, suspect discharges, and samples collected during the reporting period. The City will report the analysis results for the collected samples. The City will report if the suspect discharge was confirmed to be an illicit discharge and, if known, the type of illicit discharge.

IDDE Investigation

Activity 6. Outfall Ranking

Data from each Outfall Reconnaissance Inventory Field Sheet will be analyzed to characterize the observed outfall as having obvious, suspect, possible, or unlikely discharge potential. Obvious and suspect illicit discharges will be investigated within 10 and 30 days, respectively. Potential illicit discharges will be investigated within 60 days. The implementation process is detailed in Section 7 of the IDDE Program.

Evaluation Criteria: The City will report the ranking of each outfall inspected during the reporting period. The City will report the number of outfalls that required further investigation.

Activity 7. Discharge Investigation

Illicit discharge investigations will be performed to determine the source of a discharge problem. The implementation process is detailed in Section 7 of the IDDE Program.

Evaluation Criteria: The City will report the number of illicit discharge investigations performed during the reporting period. The City will also report the number of confirmed illicit discharges, if a source was determined, and if the discharge was eliminated.

Corrective Action Record Keeping

Activity 8. Corrective Action Record Keeping

When a suspect illicit discharge or illicit connection is identified, a case log detailing pertinent information will be created. Throughout the problem investigation and corrective action activities, all information related to the incident or property in question will be documented in the case log.

Evaluation Criteria: The City will maintain records of the correction actions. The City will report the number of confirmed illicit discharges and the number of illicit discharges corrected or eliminated during the reporting period. The City will also report the number of confirmed illicit discharges where corrective action is pending.

Storm Water System Mapping

Activity 9. Update Storm Water System Map – Existing Features

The City of Attalla will continue to expand the existing Storm Water System Map to include:

- The location of all outfalls (to include latitude and longitude) and the names and location of all waters of the State that receive discharges from those outfalls;
- Structural BMPs owned, operated, and maintained within the City limits;
- An update of known connections to the MS4 authorized or allowed by the City;
- Geographic areas which may discharge storm water into the MS4, which may not be located within the municipal boundary;
- Identification and location of waterways within the City including detention ponds, streams, and ditches.

The implementation process is further discussed in Section 5 of the IDDE Program.

Evaluation Criteria: The City will provide an updated Storm Water System Map showing the features added during the reporting period.

Activity 10. Update Storm Water System Map – Future Additions

Proposed additions within the City, including new storm sewer and drainage ditches, will be mapped based on the civil plans provided to the City. Outfalls from proposed development will be verified after construction is complete, as part

of Activity 3. The implementation process is further discussed in Section 5 of the IDDE Program.

Evaluation Criteria: The City will report the number of civil plans provided to the City and the number of verified new features or outfalls during the reporting period. The City will provide an updated Storm Water System Map showing the features added during the reporting period.

Illicit Discharge Ordinance

Activity 11. Evaluate IDDE Ordinance

Ordinance 802 (08) currently regulates Illicit Discharge enforcement. The City of Attalla will evaluate the effectiveness of Section 108 by **December 31, 2015**. If updates are required, the City will amend the existing ordinance or prepare a new ordinance.

Evaluation Criteria: The ordinance will be evaluated on its effectiveness in addressing identified illicit discharges and preventing repeat offenders. The City will report the number of complaints received, number of illicit discharges identified during the reporting period, the number of resolved violations, the number of repeat offenders, and the number of enforcement actions taken.

IDDE Public Education

Activity 12. Distribute Storm Water Educational Material

Distribute educational materials highlighting identification and reporting of potential illicit discharges during community events and through mass media advertising in conjunction with similar efforts of other co-permittees and stakeholders. The educational materials will be placed at City Hall and the Library.

Activity 13. Public Reporting and Tracking System

The City currently provides a contact number for members of the public to report non-compliant construction sites, illicit discharges (including spills or illegal dumping), impaired waterways, and violations of ordinances relating to storm water pollution.

The City will publicize the reporting number in outreach material and on the City of Attalla website.

The City will continue to track received complaints and the City's responses to the received complaints.

Evaluation Criteria: The City will evaluate the public reporting and tracking methods established by the City. The City will report the total number of complaints received, the number of complaints addressed, and the number of complaints resolved during the reporting period. The City will also report whether or not the received reports contain the required information to find and address the suspected problem. The City will provide a summary of at least one complaint received during the reporting period. This information will help measure the effectiveness of the reporting system, as well as the public awareness and concern of storm water issues.

Activity 14. Municipal Training

Municipal workers will be trained in the identification of illicit discharges as well as the prevention of storm water pollution at municipal facilities or related to municipal activities. Specific municipal operations such as fueling, vehicle maintenance, vehicle washing, paint and paint waste storage and disposal, and used oil disposal may be addressed. The next training session will be conducted by **March 31, 2016**.

Municipal workers will be notified of the procedures for reporting suspected illicit discharges to Jason Nicholson, City Engineer and the City IDDE Program Manager, including the preferred method of contact (email) and the information to be included in the report (e.g., location, date, time, observations).

Evaluation Criteria: The City will provide details on the training topics presented to the municipal workers. The City will maintain attendance records and report the number of municipal workers trained during the reporting period. This information will help measure the municipal workers awareness of illicit discharges and storm water issues.

Storm Water Monitoring

Activity 15. Storm Water Monitoring Locations

Storm water monitoring locations were identified in the 2012 SWMP and were revised in January 2014. The City will update the existing Storm Water System Map to include these locations.

If additional storm water monitoring points are recommended as a result of the analysis of the monitoring data, the City will update the map with the revised or additional locations.

Evaluation Criteria: The City will provide an updated Storm Water System Map showing the features added during the reporting period.

Activity 16. Evaluation of Monitoring Data

In conjunction with the monitoring provisions of Section 2.2 of the SWMP, the City of Attalla will evaluate the collected monitoring data for indicators of potential illicit discharges within the City and to assess the effectiveness of the BMPs in achieving the 2008 TMDL.

Evaluation Criteria: The City will report which monitoring points appear to have relatively higher pollutant loads. The City will make recommendations to the Gadsden-Etowah MS4 Storm Water Steering Committee to add and/or modify monitoring points to better characterize discharges from the MS4.

NPDES Industrial Permitting

Activity 17. As authorized by the Clean Water Act, the NPDES Permit program controls water pollution by regulating point sources that discharge pollutants into waters of the United States. Title 40, Part 122 of the Code of Federal Regulations (40CFR122) specifies that discharges associated with certain industrial activities must obtain an NPDES permit. The ADEM currently provides for individual and general NPDES permitting.

Information pertaining to permitted facilities will be obtained from available public sources such as MYWATERS Mapping, EPA ECHO Database, and ADEM E-file and incorporated into the Storm Water System Map. This information will be used in conjunction with the storm water system mapping and monitoring data to evaluate potential sources of storm water pollution and to identify unpermitted facilities.

Unpermitted facilities that require an NPDES permit will be reported to the Industrial Section of the ADEM. The City of Attalla continues to rely on the ADEM for industrial NPDES permitting and enforcement.

Evaluation Criteria: The City will provide the number of permitted facilities reported to ADEM during the reporting period, if any. This information will help measure the effectiveness of the land use evaluations.

10.3.3 Changes

The City of Attalla requests no changes to the Illicit Discharge Detection and Elimination strategies identified in the 2012 SWMP.

10.3.4 Responsible Party

The City of Attalla Mayor's office is responsible for overseeing, developing, and coordinating the IDDE program in the City of Attalla regulated MS4 area.

10.4 Construction Site Storm Water Runoff

10.4.1 2014 to 2015 Implementation Status

During the April 1, 2014 to March 31, 2015 reporting period, the City of Attalla completed six (6) of the six (6) Construction Site Storm Water Runoff strategies identified in the previous Annual Report.

A table identifying each Construction Site Storm Water Runoff strategy planned for the 2014-2015 reporting period, a description of actions taken by the City of Attalla, and a description of activities planned for the next reporting period is provided in **Appendix I**. Supporting documentation is also included in **Appendix I**.

10.4.2 Proposed Activities for the April 1, 2015 to March 31, 2016 Reporting Period

The City will implement the following activities as part of their Construction Site Storm Water Runoff Program during the 2015-2016 reporting period. To evaluate the success of the program and aid in preparing the required Annual Report, evaluation criteria have been established for each strategy.

Activity 1. Erosion and Sediment Control Ordinance

The City will evaluate the effectiveness of the Ordinance 802 (08) by **December 31, 2015**. If changes are warranted, a new or revised ordinance will be approved and implemented.

Evaluation Criteria: The ordinance will be evaluated on its effectiveness in addressing erosion and sediment control. The City will report the number of non-compliant construction sites identified by the City, the number of enforcement actions taken, the number of non-compliant sites reported to the ADEM, and whether the individuals or businesses responsible for identified non-compliant construction sites are repeat offenders.

Activity 2. Construction Site Inspection Program

Designated City personnel will inspect all qualifying construction sites within 60 days of initial disturbance, at periodic intervals during construction, and following stabilization. The City Engineer is responsible for performing necessary inspections.

The City will evaluate the effectiveness of the construction site inspection program by **December 31, 2015**.

Evaluation Criteria: The City will report the number of inspections completed, the number of non-compliant construction sites identified by the City, the number of enforcement actions taken, the number of non-compliant sites reported to the ADEM, and whether the individuals or business responsible for identified non-compliant construction sites are repeat offenders. The City will also provide a summary of at least one inspection conducted during the reporting period that resulted in enforcement actions.

Activity 3. Sediment and Erosion Control Plan Review

The City will continue to review Sediment and Erosion Control Plans and Storm Water Management Plans for all new construction, prior to the approval or denial of a land disturbance permit application.

Plan review will ensure proposed projects adequately address the City's erosion, sediment, and pollution control requirements. Plan review will also take into consideration what potential impacts to water quality the project may have.

Evaluation Criteria: The City will report the total number of plans reviewed, the number of plans approved or rejected during the reporting period, and number of plans that meet the requirements the Alabama Construction General Permit.

Activity 4. BMP Training Program

City personnel tasked with plan review and/or conducting BMP inspections will undergo annual training on proper design, installation, inspection, and maintenance of on-site control measures and on new technology and practices. All inspectors will complete initial storm water awareness training and attend annual refreshers.

Jason Nicholson was certified as a QCI in 2014 (QCI #T2436). QCI certification will be maintained through the approved annual refresher courses. Jason Nicholson will attend a 4-hour QCI continuing education course in **2015**.

Should additional inspectors be needed, they will be trained accordingly.

Evaluation Criteria: The City will provide a copy of the QCI certificates and records of awareness training received during the reporting period.

Activity 5. Public Reporting and Tracking

The City currently provides a contact number for members of the public to report non-compliant construction sites. The City will publicize the reporting number in outreach material and on the City of Attalla website.

Evaluation Criteria: The City will report the total number of complaints received, the number of addressed complaints, and the number of resolved complaints during the reporting period. The City will also report whether or not the received reports contain the required information to find and address the suspected problem. The City will provide a summary of at least one complaint received during the reporting period. This information will help measure the effectiveness of the reporting system, as well as the public awareness and concern regarding construction storm water issues.

Activity 6. Notify ADEM of Non-Compliant Sites

The City will notify the ADEM of any construction sites where a possible violation of the Clean Water Act has occurred. Possible violations may include, but are not limited to, releases of sediment to a water of the State or failure to initiate corrective actions following an inspection by the City.

The City of Attalla continues to rely on the ADEM for construction NPDES enforcement.

Evaluation Criteria: The City will report the total number of non-compliant construction sites reported to ADEM during the reporting period.

10.4.3 Changes

The City of Attalla requests no changes to the Construction Site Storm Water Runoff strategies identified in the 2012 SWMP.

10.4.4 Responsible Party

The City of Attalla Mayor's office is responsible for implementing and tracking the construction site storm water provisions of the ordinance as well as other Construction Site Storm Water Runoff strategies.

10.5 Post-Construction Storm Water Management

10.5.1 2014 to 2015 Implementation Status

During the April 1, 2014 to March 31, 2015 reporting period, the City of Attalla failed to meet three (3) of the four (4) Post-Construction Storm Water Management strategies identified in the previous Annual Report and began working on the remaining one (1) strategy.

The City of Attalla is continuing efforts to resolve conflicts between green infrastructure practices and existing codes/ordinances (Activity 4).

A table identifying each Post-Construction Storm Water Management strategy planned for the 2014-2015 reporting period, a description of actions taken by the City of Attalla, and a description of activities planned for the next reporting period is provided in **Appendix I**. Supporting documentation is also included in **Appendix I**.

10.5.2 Proposed Activities for the April 1, 2015 to March 31, 2016 Reporting Period

The City will implement the following activities as part of their Post-Construction Storm Water Management Program during the 2015-2016 reporting period. To evaluate the success of the program and aid in preparing the required Annual Report, evaluation criteria have been established for each strategy.

Activity 1. Reducing Post-Construction Runoff Volume

Ordinance 802 (08) Section 108-5(2) provides for post-construction storm water management measures to reduce runoff volume.

The ordinance will be evaluated by **December 31, 2015**. If changes are warranted, a new or revised ordinance will be approved and implemented.

Evaluation Criteria: The ordinance will be evaluated on its effectiveness in reducing runoff from new development or redevelopment. The City will report the number of submitted plans that include measures to reduce runoff volume and the number of enforcement actions taken. The evaluation may also examine which control measures are typically utilized and if additional examples should be added to the ordinance.

Activity 2. Reducing Pollutants from Development

Ordinance 802 (08) Section 108-7(1) requires that that storm water runoff be controlled to prevent pollution of local waters and provides a list of possible control measures.

The ordinance will be evaluated by **December 31, 2015**. If changes are warranted, a new or revised ordinance will be approved and implemented.

Evaluation Criteria: The ordinance will be evaluated on its effectiveness in reducing runoff from new development or redevelopment. The evaluation may also examine which control measures are typically utilized and if examples of appropriate control measures should be added to the ordinance. The City will report the number of developments where treatment of storm water runoff is required and the criteria for requiring treatment of storm water runoff.

Activity 3. Long-Term Maintenance of Storm Water Controls

Ordinance 802 (08) Section 108-5(4) requires long-term maintenance of storm water control structures.

The ordinance will be evaluated by **December 31, 2015**. If changes are warranted, a new or revised ordinance will be approved and implemented.

Evaluation Criteria: The ordinance will be evaluated on its effectiveness in addressing long-term maintenance of storm water controls. The City will report the number of submitted plans that include detailed maintenance procedures, the number of maintenance agreements reviewed, the number of maintenance provisions approved or denied, and the number of enforcement actions taken.

Activity 4. Evaluate Obstacles to Low Impact/Green Development

The City will review and evaluate policies and ordinances related to building codes, or other local regulations, with a goal of identifying regulatory and policy impediments to the installation of green infrastructure and low-impact development techniques.

Evaluation Criteria: The City will report if obstacles are identified and provide a brief summary on how the conflicts will be resolved.

10.5.3 Changes

The City of Attalla requests no other changes to the Post-construction Storm Water Management strategies identified in the 2012 SWMP.

10.5.4 Responsible Party

The City of Attalla Mayor's office is responsible for implementing the provisions of the ordinance pertaining to post construction storm water management.

10.6 Pollution Prevention and Good Housekeeping for Municipal Operations

10.6.1 2014 to 2015 Implementation Status

During the April 1, 2014 to March 31, 2015 reporting period, the City of Attalla completed three (3) of the three (3) Pollution Prevention and Good Housekeeping for Municipal Operations strategies identified in the previous Annual Report.

The City of Attalla also completed four (4) strategies beyond those proposed in the previous Annual Report. These strategies included:

- Public Works Department clean curb and gutters with shovels on an as needed basis (Activity 4)
- The City of Attalla provides brush and leaf pick-up throughout the City (Activity 5)
- The City of Attalla moved the oil recycling location underneath a shelter (Activity 6)
- The City of Attalla added a filter to the drain in the fire station (Activity 7)

A table identifying each Pollution Prevention and Good Housekeeping for Municipal Operations strategy planned for the 2014-2015 reporting period, a description of actions taken by the City of Attalla, and a description of activities planned for the next reporting period is provided in **Appendix I**. Supporting documentation is also included in **Appendix I**.

10.6.2 Proposed Activities for the April 1, 2015 to March 31, 2016 Reporting Period

The City will implement the following activities as part of their Pollution Prevention and Good Housekeeping for Municipal Operations Program during the 2015-2016 reporting period. To evaluate the success of the program and aid in preparing the required Annual Report, evaluation criteria have been established for each strategy.

Activity 1. Employee Training

The City will develop and implement a training program for municipal employees that focus on pollution prevention, good housekeeping measures, identification of potential illicit discharges, and other potential threats to storm water quality. Training materials will focus on vehicle maintenance and identification and reporting of potential illicit discharges.

The next training session will be conducted by **March 31, 2016**.

Evaluation Criteria: The City will provide details on the training topics presented to municipal workers during the reporting period. The City will keep attendance records and report the number of municipal workers trained during the reporting period. This information will help measure the municipal workers awareness of storm water issues.

Activity 2. Vehicle Maintenance Program

The City of Attalla owns and operates a variety of vehicles and equipment used in municipal operations and maintenance. These vehicles include passenger cars, trucks, vans, and equipment. The City will continue to conduct routine maintenance of owned vehicles and will inspect vehicles for the presence of fluid leaks during routine maintenance using the vehicle inspection log. The City will promptly repair vehicles determined to have leaks.

Evaluation Criteria: The City will provide a completed inspection log for at least one vehicle used during the reporting period. The City will report the

frequency of inspections and the number of vehicle or equipment leaks identified during the reporting period as a result of the inspection program. This information will help measure the effectiveness of the vehicle inspection and maintenance program.

Activity 3. Vehicle Wash Area

Vehicle washing will be performed only in designated areas. Each location will be reviewed, inspected, and modified as needed throughout the year. During the annual BMP training, the City will notify all employees of the locations of the designated wash areas.

The City discontinued use of phosphate-containing soaps at the Fire Station. Where possible, the City will discontinue use of phosphate-containing soaps for vehicle washing (unless washing takes place at an NPDES-permitted facility), and will incorporate non-phosphatic detergents in wash procedures.

Evaluation Criteria: The City will report the number of designated municipal vehicle washing areas. The City will also keep attendance records and report the number of municipal workers trained during the reporting period. This information will help measure the municipal workers awareness of storm water issues.

10.6.3 Changes

The City of Attalla requests no changes to the Pollution Prevention and Good Housekeeping for Municipal Operations strategies identified in the 2012 SWMP.

10.6.4 Responsible Party

The City of Attalla Mayor’s office is responsible for implementing and tracking Pollution Prevention and Good Housekeeping strategies within municipal operations.

10.7 Agency Certification

This Annual Report is produced jointly by the eight jurisdictions comprising the Gadsden-Etowah Phase II Small Municipal Separate Storm System. Implementation of the minimum control measures applicable to each jurisdiction is the responsibility of the individual jurisdiction. Implementation of the storm water monitoring component of the Storm Water Management Program is a joint responsibility of all jurisdictions.

I certify under penalty of law that this document and all attachments pertaining to the City of Attalla were prepared under my directions or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated 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 or imprisonment for knowing violations.



Larry Means, Mayor
City of Attalla, Alabama

3/27/15
Date

11. ETOWAH COUNTY

Unincorporated portions of Etowah County within the *Gadsden, Alabama Urbanized Area* encompass approximately 16.5% of the Urbanized Area and account for approximately 4.5% of the population. Although only a relatively small portion of unincorporated Etowah County lies within the MS4 boundary, the majority of Etowah County lies within the Coosa River watershed. The information, resources, minimum control measures, and best management practices developed for the MS4 Storm Water Management Program can be applied to any area within the County and therefore ultimately benefit water quality of the Coosa River.

In accordance with Part III.B of the NPDES General Permit, the 2012 Storm Water Management Program detailed the specific activities Etowah County planned to undertake regarding the following six minimum control measures:

1. Public Education and Outreach on Storm Water Impacts
2. Public Involvement/Participation
3. Illicit Discharge Detection and Elimination (IDDE)
4. Construction Site Storm Water Runoff Control
5. Post-Construction Storm Water Management in New Development and Redevelopment
6. Pollution Prevention/Good Housekeeping for Municipal Operations

The following sections detail the current implementation status of each minimum control measure, activities conducted during the current reporting period, planned activities for the upcoming reporting period, requested changes to the provisions of the 2012 SWMP, and the party responsible for implementing each minimum control measure.

11.1 Public Education and Outreach

11.1.1 2014 to 2015 Implementation Status

During the April 1, 2014 to March 31, 2015 reporting period, Etowah County completed seven (7) of the seven (7) Public Education and Outreach strategies identified in the previous Annual Report.

A table identifying each Public Education and Outreach strategy planned for the 2014-2015 reporting period, a description of actions taken by Etowah County, and a description of activities planned for the next reporting period is provided in **Appendix J**. Supporting documentation is also included in **Appendix J**.

11.1.2 Proposed Activities for the April 1, 2015 to March 31, 2016 Reporting Period

The County will implement the following activities as part of their Public Education and Outreach Program during the 2015-2016 reporting period. To evaluate the success of the

program and aid in preparing the required Annual Report, evaluation criteria have been established for each strategy.

Activity 1. Maintain the Storm Water Webpage

The County will regularly update maintain a webpage or link about storm water on the Etowah County website. Participation will be tracked though the number of “hits” on the webpage. The webpage will:

- (1) Include general information on the Gadsden-Etowah MS4;
- (2) Discuss the storm water cycle and how common contaminants enter the storm water system;
- (3) Provide educational materials about proper and improper use, storage, and disposal of common household chemicals;
- (4) Provide links to related storm water resources;
- (5) Provide contact information for reporting illicit discharges; and,
- (6) Provide a calendar of upcoming community events related to storm water outreach.

Evaluation Criteria: The County will report what information was added to the webpage and the number of “hits” on the webpage. The County has an additional target of **200 contacts** for the reporting period. This information will indicate the number of people who view the webpage and the associated educational materials.

Activity 2. Partnerships in Educational and Public Involvement Events

The County will partner with Keep Etowah Beautiful, the Middle Coosa Watershed Project, and/or Alabama Power to distribute storm water educational material and promote events such as *Renew Our Rivers*, *Message in a Bottle*, and/or community cleanup days. The events will be advertised at the City Hall, Library, and other businesses. Promotion methods may include co-sponsoring radio, television, and/or print advertisement with co-permittees and other stakeholders. County personnel will participate in the events.

Evaluation Criteria: The County will report number of participants who received educational materials during the events and the ways in which the event the County promoted and/or advertised the event. This information will indicate the number of people who received educational materials and will help measure the public awareness of the event and degree of public participation.

Activity 3. Promote Water Quality Awareness Week

The County will promote and participate in the 2015 *Water Quality Awareness Week* through County resources including co-sponsoring radio, television, and print advertisement with co-permittees and other stakeholders.

Evaluation Criteria: The County will report activities associated with this event and the ways in which the County promoted *Water Quality Awareness Week*. This information will help measure the public awareness of the event and degree of public and County participation.

Activity 4. Promote and Participate in the Etowah County Water Festival

The County will promote and participate in the annual *Etowah County Water Festival* through County resources. Promotion methods may include co-sponsoring radio, television, and/or print advertisement with co-permittees and other stakeholders. County personnel will participate in the festival.

Evaluation Criteria: The County will report number of County volunteers at the event and the ways in which the County promoted and/or advertised the event. This information will indicate the County's participation and will help measure the public awareness of the event and degree of public and County participation.

Activity 5. Partner with NRCS

The County will partner with the Etowah County NRCS to educate and assist agricultural land users within the county on how agricultural runoff contributes to the Lake Neely Henry organic enrichment and excess nutrient loading, available Environmental Quality Incentives Programs, and Best Management Practices for reducing nutrient and sediment runoff.

NRCS has educational materials available in their office. The County points citizens to the NRCS for additional information.

Evaluation Criteria: The County will report number of people pointed towards NRCS and the number of educational materials passed out by NRCS. This information will indicate the number of people who received educational materials.

Activity 6. Gadsden-Etowah MS4 Steering Committee Meetings

The County will coordinate and/or participate in quarterly meetings of the Stormwater Steering Committee for entity updates, networking, and coordination of activities and BMP strategies.

Evaluation Criteria: The County will provide meeting agendas during the reporting period. The County will keep attendance records. This information will indicate the participation of the steering committee and their interest in networking and coordination of activities.

Activity 7. Provide Information on Construction Site Storm Water Impacts

The County will provide pre-printed information on how construction site runoff can impact storm water quality to individuals requesting plan review and building/development permits.

Evaluation Criteria: The County will report the number of permits issued during the reporting period. This information will indicate the number of people who received educational materials.

11.1.3 Changes

Etowah County requests no other changes to the Public Education and Outreach strategies identified in the 2012 SWMP.

11.1.4 Responsible Party

The Etowah County Engineer's office is responsible for developing, coordinating, overseeing, and tracking the Public Education and Outreach efforts.

11.2 Public Involvement and Participation

11.2.1 2014 to 2015 Implementation Status

During the April 1, 2014 to March 31, 2015 reporting period, Etowah County completed five (5) of the six (6) Public Involvement and Participation strategies identified in the previous Annual Report and began working on the remaining one (1) strategy.

Etowah County along with the Gadsden-Etowah Steering Committee scheduled a Second Annual MS4 Conference again February 25, 2015; however due to inclement weather forecast the conference was postponed two days before the conference. The County received 8 inches of snow that day. The Conference has been rescheduled for April 15, 2015 (Activity 1).

Etowah County also completed four (4) strategies beyond those proposed in the previous Annual Report. These strategies included:

- Mr. Robert Nail attended Auburn University Stormwater Runoff Control Seminars (Activity 7)
- Etowah County partners with Advanced Disposal had open-top containers at several locations across County (Activity 8)
- Etowah County sponsors a Drug Collection Day (Activity 9)

- The County supports Adopt-A-Mile Program by providing trash bags for cleanup, maintaining the Adopt-A-Mile signs, and disposing of the garbage collected (Activity 10)

A table identifying each Public Involvement and Participation strategy planned for the 2014-2015 reporting period, a description of actions taken by Etowah County, and a description of activities planned for the next reporting period is provided in **Appendix J**. Supporting documentation is also included in **Appendix J**.

11.2.2 Proposed Activities for the April 1, 2015 to March 31, 2016 Reporting Period

The County will implement the following activities as part of their Public Involvement and Participation Program during the 2015-2016 reporting period. To evaluate the success of the program and aid in preparing the required Annual Report, evaluation criteria have been established for each strategy.

Activity 1. Storm Water Conference/Public Meeting

The County will develop and coordinate an annual Storm Water Conference/Public Meeting for local businesses and residents. The second annual MS4 conference is currently scheduled for April 15, 2015. The County will develop and coordinate a third annual MS4 conference in 2015 or 2016.

This will be a joint outreach effort with all co-permittees participating. The agenda may include general information on the Gadsden-Etowah MS4, presentations pertaining to how common contaminants enter the storm water system, and presentations by key stakeholders such as the ADEM, Natural Resources and Conservation Service, and Clean Water Partnership. The purpose of the conference/meeting will be to encourage public participation and input into the storm water management program.

Evaluation Criteria: The County will report the number of conference attendees and provide a copy of the agenda to demonstrate the focus of the conference. This information will help measure the public education and involvement.

Activity 2. Partnerships in Educational and Public Involvement Events

The County will participate in and promote annual programs associated with the Coosa Basin Clean Water Partnership, Keep Etowah Beautiful, the Middle Coosa Watershed Project, and/or Alabama Power such as Renew Our Rivers, Message in a Bottle, and/or community cleanup days. Promotion methods may include co-sponsoring radio, television, and/or print advertisement with co-permittees and other stakeholders. County personnel will participate in the events.

Evaluation Criteria: The County will report number of County volunteers at the events and the ways in which the County promoted and/or advertised the event.

This information will help measure the public awareness of the event and degree of public and County participation.

Activity 3. Promote and Participate in Renew Our Rivers

The County will participate in and promote the *Renew Our Rivers* program in the **November of 2015**. Promotion methods may include co-sponsoring radio, television, and/or print advertisement with co-permittees and other stakeholders. County personnel will participate in the event.

Evaluation Criteria: The County will report number of County volunteers at the event and the ways in which the County promoted / advertised the event. This information will indicate the number of people who received educational materials and will help measure the public awareness of the event and degree of public participation.

Activity 4. Promote and Participate in the Etowah County Water Festival

The County will promote and participate in the annual *Etowah County Water Festival* through County resources. Promotion methods may include co-sponsoring radio, television, and/or print advertisement with co-permittees and other stakeholders. County personnel will participate in the festival.

Evaluation Criteria: The County will report number of County volunteers at the event and the ways in which the County promoted / advertised the event. This information will indicate the County's participation and will help measure the public awareness of the event and degree of public and County participation.

Activity 5. Public Reporting and Tracking System

The County currently provides an online form to report storm water issues. The form was developed during the 2013-2014 reporting period for the public to report non-compliant construction sites, illicit discharges (including spills or illegal dumping), impaired waterways, and violations of ordinances relating to storm water pollution. The form does not currently allow anonymous reporting. The County will evaluate the current public reporting and tracking methods.

The County will continue to track received complaints and the County's responses to the received complaints.

Evaluation Criteria: The County will report the total number of complaints received, the number of complaints addressed, and the number of complaints resolved during the reporting period. The County will also report whether or not the received reports contain the required information to find and address the suspected problem. The County will provide a summary of at least one complaint

received during the reporting period. This information will help measure the effectiveness of the reporting system, as well as the public awareness and concern of storm water issues.

Activity 6. Provide Comment and Feedback Methods

The County will provide a contact number on the Storm Water webpage for members of the public to provide comments on the MS4 program, feedback on the public outreach efforts, and suggestions for improvement to the program. The County will evaluate the comment and feedback methods.

The County will evaluate the comment feedback methods each reporting period.

Evaluation Criteria: The County will report the total number of comments received from the public.

11.2.3 Changes

Etowah County requests no other changes to the Public Involvement and Participation strategies identified in the 2012 SWMP.

11.2.4 Responsible Party

The Etowah County Engineers office is responsible for developing, coordinating, overseeing, and tracking the Public Involvement and Participation efforts.

11.3 Illicit Discharge Detection and Elimination

11.3.1 2014 to 2015 Implementation Status

During the April 1, 2014 to March 31, 2015 reporting period, the Etowah County completed sixteen (16) of the sixteen (16) Illicit Discharge Detection and Elimination strategies identified in the previous Annual Report.

A table identifying each Illicit Discharge Detection and Elimination strategy planned for the 2014-2015 reporting period, a description of actions taken by the Etowah County, and a description of activities planned for the next reporting period is provided in **Appendix C**. Supporting documentation is also included in **Appendix C**.

11.3.2 Proposed Activities for the April 1, 2015 to March 31, 2016 Reporting Period

The County will implement the following activities as part of their Illicit Discharge Detection and Elimination Program during the 2015-2016 reporting period. To evaluate the success of the program and aid in preparing the required Annual Report, evaluation criteria have been established for each strategy.

Identifying Priority Areas

Activity 1. Identify Priority Areas

The County delineated drainage basins in the 2014-2015 reporting period. The County will then re-evaluate the drainage basins by **April 30, 2015** to determine the Priority Areas for the 2015-2016 reporting period. Priority Areas will be identified using the illicit discharge potential (IDP) calculation procedures detailed in Section 3 of the IDDE Program. The County will maintain records of the IDP calculations for each drainage basin.

Evaluation Criteria: The County will report the total IDP score for each drainage basin and will provide an updated map showing the identified Priority Areas. The County will report drainage basins that are newly listed or de-listed from the previous reporting year's calculations.

Field Assessment Activities

Activity 2. Outfall Identification

The County will implement a stream-walking program designed to identify previously unknown outfalls to the MS4. The County also plans to map a portion of the waterbodies that receive discharge from the MS4 during the reporting period. The implementation process is detailed in Section 4 of the IDDE Program.

Evaluation Criteria: The County will maintain records of field observations. The County will report the number of outfalls identified and the stream length walked during the reporting period. The County will provide updated tables and maps that include the outfalls identified by the stream-walking program.

Activity 3. Probable Outfall Verification

Probable outfalls may be identified during mapping activities, during review of proposed development plans, or through illicit discharge reports. When a probable outfall is identified, it will be added to the GIS database and labeled as unverified.

The County will verify probable outfalls through field observation within 18 months of their addition to the GIS database. The implementation process is detailed in Section 4 of the IDDE Program.

Evaluation Criteria: The County will report the number of probable outfalls that were identified and the number of outfalls that were verified during the reporting period. The County will provide updated tables and maps that include the verified outfalls, as well as probable outfalls that are planned to be verified in the

following reporting period. The County will maintain records of field observations.

Activity 4. Outfall Reconnaissance Inventory

During the reporting period, the County or subcontracted crews will conduct dry weather monitoring of major outfalls in Priority Areas. The County will also inspect a portion of the outfalls located outside Priority Areas. The implementation process is detailed in Section 7 of the IDDE Program.

Evaluation Criteria: The County will maintain records of field observations. The County will report the number of outfalls inspected during the reporting period. The County will also provide a summary of the results of outfall reconnaissance inventory activities conducted during the reporting period.

Activity 5. Suspect Discharge Sampling

If a dry weather flow has a severity index of 3 on one or more indicators in Section 4 of the Outfall Reconnaissance Inventory Field Sheet, or if field screening indicates a suspect discharge, field crews will collect samples for further analysis. The implementation process is detailed in Section 7 of the IDDE Program.

Evaluation Criteria: The County will report the number of identified dry weather flows, suspect discharges, and samples collected during the reporting period. The County will report the analysis results for the collected samples. The County will report if the suspect discharge was confirmed to be an illicit discharge and, if known, the type of illicit discharge.

IDDE Investigation

Activity 6. Outfall Ranking

Data from each Outfall Reconnaissance Inventory Field Sheet will be analyzed to characterize the observed outfall as having obvious, suspect, possible, or unlikely discharge potential. Obvious and suspect illicit discharges will be investigated within 10 and 30 days, respectively. Potential illicit discharges will be investigated within 60 days. The implementation process is detailed in Section 7 of the IDDE Program.

Evaluation Criteria: The County will report the ranking of each outfall inspected during the reporting period. The County will report the number of outfalls that required further investigation.

Activity 7. Discharge Investigation

Illicit discharge investigations will be performed to determine the source of a discharge problem. The implementation process is detailed in Section 7 of the IDDE Program.

Evaluation Criteria: The County will report the number of illicit discharge investigations performed during the reporting period. The County will also report the number of confirmed illicit discharges, if a source was determined, and if the discharge was eliminated.

Corrective Action Record Keeping

Activity 8. Corrective Action Record Keeping

When a suspect illicit discharge or illicit connection is identified, a case log detailing pertinent information will be created. Throughout the problem investigation and corrective action activities, all information related to the incident or property in question will be documented in the case log.

Evaluation Criteria: The County will maintain records of the correction actions. The County will report the number of confirmed illicit discharges and the number of illicit discharges corrected or eliminated during the reporting period. The County will also report the number of confirmed illicit discharges where corrective action is pending.

Storm Water System Mapping

Activity 9. Update Storm Water System Map – Existing Features

The County will update the current Etowah County GIS database to include:

- The location of all outfalls (to include latitude and longitude) and the names and location of all waters of the State that receive discharges from those outfalls;
- Structural BMPs owned, operated, and maintained within the unincorporated portions of Etowah County;
- An update of known connections to the MS4 authorized or allowed by the County;
- Geographic areas which may discharge storm water into the MS4, which may not be located within the unincorporated portions of Etowah County;
- Identification and location of waterways within the County including detention ponds, streams, and ditches.

The implementation process is further discussed in Section 5 of the IDDE Program.

Evaluation Criteria: The County will provide an updated Storm Water System Map showing the features added during the reporting period.

Activity 10. Update Storm Water System Map – Future Additions

Proposed additions within the County, including new storm sewer and drainage ditches, will be mapped based on the civil plans provided to the County or digitized by the County. Outfalls from proposed development will be verified after construction is complete, as part of Activity 3. The implementation process is further discussed in Section 5 of the IDDE Program.

Evaluation Criteria: The County will report the number of civil plans provided to the County and the number of verified new features or outfalls during the reporting period. The County will provide an updated Storm Water System Map showing the features added during the reporting period.

Illicit Discharge Ordinance

Activity 11. Evaluate IDDE Ordinance

In Etowah County, home rule is limited by state constitution. Counties have no general grant of power in the state constitution and must go to the Alabama Legislature for authority to engage in any activity not currently authorized by the State Constitution. Authority may be granted through constitutional amendments or by an act of the legislature known as "local legislation." Etowah County currently does not have the authority to enact an illicit discharge ordinance, and will require action from the Alabama Legislature to gain that ability.

The County will report any identified illicit discharges, connections, or dumping activities to the ADEM Water Division for enforcement actions.

Evaluation Criteria: The County will report the number of complaints received, number of illicit discharges identified during the reporting period, the number of violations turned over to ADEM, and the number of repeat offenders.

IDDE Public Education

Activity 12. Public Reporting and Tracking System

The County provides an online report form developed during the 2013-2014 reporting period for the public to report potential illicit discharges, spills, illegal dumping, or violations of regulations relating to storm water pollution. The

reports will be tracked through resolution. The County will evaluate the current public reporting and tracking methods.

The County will continue to track received complaints and the County's responses to the received complaints.

Evaluation Criteria: The County will report the total number of complaints received, the number of complaints addressed, and the number of complaints resolved during the reporting period. The County will also report whether or not the received reports contain the required information to find and address the suspected problem. The County will provide a summary of at least one complaint received during the reporting period. This information will help measure the effectiveness of the reporting system, as well as the public awareness and concern of storm water issues.

Activity 13. County Training

County workers will be trained in the identification of illicit discharges as well as the prevention of storm water pollution at County facilities or related to County activities. Specific operations such as fueling, vehicle maintenance, vehicle washing, paint and paint waste storage and disposal, and used oil disposal may be addressed. The next training session will be conducted by **March 31, 2016**.

County workers will be notified of the procedures for reporting suspected illicit discharges to Robert Nail, Assistant County Engineer and the County IDDE Program Manager, including the preferred method of contact (email) and the information to be included in the report (e.g., location, date, time, observations).

Evaluation Criteria: The County will provide details on the training topics presented to the municipal workers. The County will maintain attendance records and report the number of municipal workers trained during the reporting period. This information will help measure the municipal workers awareness of illicit discharges and storm water issues.

Storm Water Monitoring

Activity 14. Storm Water Monitoring Locations

Storm water monitoring locations were identified in the 2012 SWMP and were revised in January 2014. The County updated the existing Storm Water System Map to include these locations.

If additional storm water monitoring points are identified as a result of the analysis of the monitoring data, the County will update the map with the revised or additional locations.

Evaluation Criteria: The County will provide an updated Storm Water System Map showing the features added during the reporting period.

Activity 15. Evaluation of Monitoring Data

In conjunction with the monitoring provisions of Section 2.2 of the SWMP, Etowah County will evaluate the collected monitoring data for indicators of potential illicit discharges within the County and to assess the effectiveness of the BMPs in achieving the 2008 TMDL. Monitoring data will be incorporated into the GIS database to facilitate evaluation and identification of impacted outfalls or contributing sub-watersheds.

Evaluation Criteria: The County will report which monitoring points appear to have relatively higher pollutant loads. The County will make recommendations to the Gadsden-Etowah MS4 Storm Water Steering Committee to add and/or modify monitoring points to better characterize discharges from the MS4.

NPDES Industrial Permitting

Activity 16. As authorized by the Clean Water Act, the NPDES Permit program controls water pollution by regulating point sources that discharge pollutants into waters of the United States. Title 40, Part 122 of the Code of Federal Regulations (40CFR122) specifies that discharges associated with certain industrial activities must obtain an NPDES permit. The ADEM currently provides for individual and general NPDES permitting.

Information pertaining to permitted facilities will be obtained from available public sources such as MYWATERS Mapping, EPA ECHO Database, and ADEM E-file and incorporated into the GIS database. This information will be used in conjunction with the storm water system mapping and monitoring data to evaluate potential sources of storm water pollution and to identify unpermitted facilities.

Unpermitted facilities that require an NPDES permit will be reported to the Industrial Section of the ADEM. Etowah County continues to rely on the ADEM for industrial NPDES permitting and enforcement.

Evaluation Criteria: The County will provide the number of permitted facilities reported to ADEM during the reporting period, if any. This information will help measure the effectiveness of the land use evaluations.

11.3.3 Changes

Etowah County requests no changes to the Illicit Discharge Detection and Elimination strategies identified in the 2012 SWMP.

11.3.4 Responsible Party

The Etowah County Engineers office is responsible for developing, coordinating, overseeing, and enforcing the IDDE program within the Etowah County regulated MS4 area.

11.4 Construction Site Storm Water Runoff

11.4.1 2014 to 2015 Implementation Status

During the April 1, 2014 to March 31, 2015 reporting period, the Etowah County completed five (5) of the five (5) Construction Site Storm Water Runoff strategies identified in the previous Annual Report.

A table identifying each Construction Site Storm Water Runoff strategy planned for the 2014-2015 reporting period, a description of actions taken by the Etowah County, and a description of activities planned for the next reporting period is provided in **Appendix J**. Supporting documentation is also included in **Appendix J**.

11.4.2 Proposed Activities for the April 1, 2015 to March 31, 2016 Reporting Period

The County will implement the following activities as part of their Construction Site Storm Water Runoff Program during the 2015-2016 reporting period. To evaluate the success of the program and aid in preparing the required Annual Report, evaluation criteria have been established for each strategy.

Activity 1. Erosion and Sediment Control Ordinance

The County will evaluate the effectiveness of the County's Subdivision Regulations, Article V, Section 5-4-4 (Road Construction Requirements) that requires the developer to provide appropriate erosion control in accordance with ADEM regulations and to provide a copy of the ADEM permit to the County prior to beginning work, by **December 31, 2015**.

If changes are warranted, a new or revised ordinance will be approved and implemented by **March 31, 2016**.

Evaluation Criteria: The ordinance will be evaluated on its effectiveness in addressing erosion and sediment control. The County will report the number of non-compliant construction sites identified by the County, the number of enforcement actions taken, the number of non-compliant sites reported to the ADEM, and whether the individuals or businesses responsible for identified non-compliant construction sites are repeat offenders.

Activity 2. Construction Site Inspection Program

Etowah County currently conducts inspections of construction sites within subdivisions. Designated County personnel will inspect all qualifying construction sites within 60 days of initial disturbance, at periodic intervals during construction, and following stabilization. The County tracks inspections with a simple spreadsheet.

The County will evaluate the effectiveness of the construction site inspection program **by December 31, 2015.**

Evaluation Criteria: The County will report the number of inspections completed, the number of non-compliant construction sites identified by the County, the number of enforcement actions taken, the number of non-compliant sites reported to the ADEM, and whether the individuals or business responsible for identified non-compliant construction sites are repeat offenders. The County will also provide a summary of at least one inspection conducted during the reporting period that resulted in enforcement actions.

Activity 3. Sediment and Erosion Control Plan Review

Article IV, Section 4.2 (Construction Plan Requirements) of the Etowah County Subdivision Regulations requires the submittal of a *Storm Drainage Plan* to the County Engineer with submittal of a Major Subdivision Plat. Prior to approval or denial of a land disturbance permit application, the County will review the provided plans.

Plan review will ensure proposed projects adequately address applicable erosion, sediment, and pollution control requirements. Plan review will also take into consideration what potential impacts to water quality the project may have.

Evaluation Criteria: The County will report the total number of plans reviewed, the number of plans approved or rejected during the reporting period, and number of plans that meet the requirements the Alabama Construction General Permit.

Activity 4. BMP Training Program

County personnel tasked with plan review and/or conducting BMP inspections will undergo annual training on proper design, installation, inspection, and maintenance of on-site control measures and on new technology and practices. All inspectors will complete initial storm water awareness training and attend annual refreshers.

The County currently has three individuals certified as Qualified Credentialed Inspectors (QCI). QCI certification will be maintained through the approved annual refresher courses. The 4-hour continuing education training is scheduled for **May 2015**.

Activity 5. Notify ADEM of Non-Compliant Sites

The County will notify the ADEM of any construction sites where a possible violation of the Clean Water Act has occurred. Possible violations may include, but are not limited to, releases of sediment to a water of the State or failure to initiate corrective actions following an inspection by the County.

Etowah County continues to rely on the ADEM for construction NPDES enforcement.

Evaluation Criteria: The County will report the total number of non-compliant construction sites reported to ADEM during the reporting period.

11.4.3 Changes

The Etowah County requests no changes to the Construction Site Storm Water Runoff strategies identified in the 2012 SWMP.

11.4.4 Responsible Party

The Etowah County Engineer's office is responsible for developing, coordinating, overseeing, and enforcing the construction site storm water program.

11.5 Post-Construction Storm Water Management

11.5.1 2014 to 2015 Implementation Status

During the April 1, 2014 to March 31, 2015 reporting period, Etowah County met three (3) of the three (3) Post-Construction Storm Water Management strategies identified in the previous Annual Report.

Etowah County also completed three (3) strategies beyond those proposed in the previous Annual Report. These strategies include:

- Etowah County works to reduce runoff within our right-of way and monitor our areas for erosion using riprap and vegetation (Activity 4)
- Etowah County began work to replace an existing bridge on Bud Umphrey Road which was subject to debris build-up and possible flooding (Activity 5)
- Etowah County completed a bank stabilization project for Horton Creek at Sutton Bridge Road and Brown Avenue (Activity 6)

A table identifying each Post-Construction Storm Water Management strategy planned for the 2014-2015 reporting period, a description of actions taken by the Etowah County, and a description of activities planned for the next reporting period is provided in **Appendix J**. Supporting documentation is also included in **Appendix J**.

11.5.2 Proposed Activities for the April 1, 2015 to March 31, 2016 Reporting Period

The County will implement the following activities as part of their Post-Construction Storm Water Management Program during the 2015-2016 reporting period. To evaluate the success of the program and aid in preparing the required Annual Report, evaluation criteria have been established for each strategy.

Activity 1. Reducing Post-Construction Runoff Volume

Article IV Section 4.2 (Construction Plan Requirements) of the Etowah County Subdivision Regulations requires submittal of a *Storm Drainage Plan* with submittal of a Major Subdivision Plat. Sections 4-2(2)e-h require details of pre- and post-construction runoff, drainage structures, and compatibility with existing drainage to be provided with each submitted plan.

Etowah County Subdivision Regulations 5-1(4) Page 24 and 5-4-4 Page 30 requires developers to meet the rules and standards of ADEM and other appropriate State or Federal agencies.

The subdivision regulations will be evaluated by **December 31, 2015**. If changes are warranted, a new or revised ordinance will be approved and implemented.

Evaluation Criteria: The subdivision regulations will be evaluated on their effectiveness in reducing runoff from new development or redevelopment. The evaluation may also examine which control measures are typically utilized and if examples of appropriate control measures should be added to the ordinance. The County will report the number of developments where treatment of storm water runoff is required and the criteria for requiring treatment of storm water runoff.

Activity 2. Reducing Pollutants from Development

Etowah County Subdivision Regulations 5-4-4(11) Page 33 Subdivision regulations specify storm drainage runoff requirements for developers.

The subdivision regulations will be evaluated by **December 31, 2015**. If changes are warranted, a new or revised ordinance will be approved and implemented.

Evaluation Criteria: The subdivision regulations will be evaluated on their effectiveness in reducing runoff from new development or redevelopment. The evaluation may also examine which control measures are typically utilized and if examples of appropriate control measures should be added to the regulations. The County will report the number of developments where treatment of storm water runoff is required and the criteria for requiring treatment of storm water runoff.

Activity 3. Evaluate Obstacles to Low Impact/Green Development

The County will review and evaluate policies and ordinances related to building codes, or other local regulations, with a goal of identifying regulatory and policy impediments to the installation of green infrastructure and low-impact development techniques.

Evaluation Criteria: The County will report if obstacles are identified and provide a brief summary on how the conflicts will be resolved.

11.5.3 Changes

Etowah County requests no changes to the Post-Construction Storm Water Management strategies identified in the 2012 SWMP.

11.5.4 Responsible Party

The Etowah County Engineer's office is responsible for developing, coordinating, overseeing, and enforcing the Post-Construction Storm Water Management program.

11.6 Pollution Prevention and Good Housekeeping for Municipal Operations

11.6.1 2014 to 2015 Implementation Status

During the April 1, 2014 to March 31, 2015 reporting period, Etowah County completed four (4) of the four (4) Pollution Prevention and Good Housekeeping for Municipal Operations strategies identified in the previous Annual Report.

Etowah County also completed nine (9) strategies beyond those proposed in the previous Annual Report. These strategies include:

- Etowah County recycles aluminum cans in the break room at the maintenance shop (Activity 5)
- Etowah County recycles metal from County projects (Activity 6)
- Etowah County collects used oil and filters at the Maintenance Shop (Activity 7)

- Etowah County removes dead animals from the roadside (Activity 8)
- Etowah County partners with Advanced Disposal had open-top containers at several locations across County (Activity 9)
- Etowah County partners with Advanced Disposal had open-top containers at several locations across County (Activity 10)
- Etowah County clears and removes trees and brush from drainageways as needed (Activity 11)
- Etowah County provided cleanup services after storms and tornados in April 2014 (Activity 12)
- The County maintains "No Dumping \$500 fine" signs and these No Dumping areas are under video surveillance signs (Activity 13)

A table identifying each Pollution Prevention and Good Housekeeping for Municipal Operations strategy planned for the 2014-2015 reporting period, a description of actions taken by Etowah County, and a description of activities planned for the next reporting period is provided in **Appendix J**. Supporting documentation is also included in **Appendix J**.

11.6.2 Proposed Activities for the April 1, 2015 to March 31, 2016 Reporting Period

The County will implement the following activities as part of their Pollution Prevention and Good Housekeeping for Municipal Operations Program during the 2015-2016 reporting period. To evaluate the success of the program and aid in preparing the required Annual Report, evaluation criteria have been established for each strategy.

Activity 1. Employee Training

The County will continue to implement a training program for municipal employees that focus on pollution prevention, good housekeeping measures, identification of potential illicit discharges, and other potential threats to storm water quality. Training materials will focus on vehicle, roadway, and building maintenance, herbicides, pesticides, and street cleaning.

The next training session will be conducted by **March 31, 2016**.

Evaluation Criteria: The County will provide details on the training topics presented to municipal workers during the reporting period. The County will keep attendance records and report the number of municipal workers trained during the reporting period. This information will help measure the municipal workers awareness of storm water issues.

Activity 2. Vehicle Maintenance Program

The County owns and operates a variety of vehicles and equipment used in municipal operations and maintenance including trucks and equipment. The County will conduct routine maintenance of owned vehicles and will inspect

vehicles for the presence of fluid leaks during routine maintenance. The County will promptly repair vehicles determined to have leaks.

Evaluation Criteria: The County will provide a completed inspection log for at least one vehicle used during the reporting period. The County will report the frequency of inspections and the number of vehicle or equipment leaks identified during the reporting period as a result of the inspection program. This information will help measure the effectiveness of the vehicle inspection and maintenance program.

Activity 3. Vehicle Wash Areas

A specified area for vehicle washing has been established for each department. Each department location will be reviewed, inspected, and modified as needed throughout the year. During the annual BMP training, the County will notify all employees of the locations of the designated wash areas.

The County discontinued use of phosphate-containing soaps at the Gadsden and Attalla shops. Where possible, the County will discontinue use of phosphate-containing soaps for vehicle washing (unless washing takes place at an NPDES-permitted facility), and will incorporate non-phosphatic detergents in wash procedures.

Evaluation Criteria: The County will report the number of designated vehicle washing areas. The County will also keep attendance records and report the number of municipal workers trained during the reporting period. This information will help measure the municipal workers awareness of storm water issues.

Activity 4. Pesticide Application

The County uses various pesticides (insecticides and herbicides) to control insect pests and unwanted vegetation. The County currently has two employees with the current certifications. To ensure that pesticide applications do not contribute to negative water quality, applicators will have current certifications. The County will comply with pesticide application and disposal regulations. The County employees will be recertified in 2014.

Prior to entering into or renewing any additional contracts the County will require the contractor to provide all necessary certifications and licensing during the bid process.

To reduce potential impact to waterways, the County will review all areas where pesticides are to be used. Areas where pesticides are determine to post a threat to

water quality should be noted on the storm water map and identified in the annual report.

Evaluation Criteria: The County will maintain a copy of the current certification. The County will report the number of areas where it was determined pesticides impacted waterways during the reporting period, if any, and how the impact was resolved. A Storm Water System Map showing the location of these areas will be provided in the Annual Report. This information will help measure the effectiveness of the County’s review.

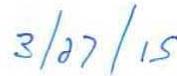
11.7 Agency Certification

This Annual Report is produced jointly by the eight jurisdictions comprising the Gadsden-Etowah Phase II Small Municipal Separate Storm Sewer System. Implementation of the minimum control measures applicable to each jurisdiction is the responsibility of the individual jurisdiction. Implementation of the storm water monitoring component of the Storm Water Management Program is a joint responsibility of all jurisdictions.

I certify under penalty of law that this document and all attachments pertaining to the unincorporated portions of Etowah County were prepared under my directions or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated 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 or imprisonment for knowing violations.



Signature of Etowah County Responsible Official



Date

ROBERT NAIL - ASST. CO. ENG.

Print Name and Title

**GADSDEN, ALABAMA URBANIZED AREA
STORM WATER MANAGEMENT PROGRAM**

NPDES General Permit ALR040009

APPENDIX A – FIGURES

Figure 1 – Gadsden, Alabama Urbanized Area

Figure 2 – MS4 Monitoring Locations

**GADSDEN, ALABAMA URBANIZED AREA
STORM WATER MANAGEMENT PROGRAM**

NPDES General Permit ALR040009

APPENDIX B – MS4 MONITORING REPORTS

2014 Second Quarter Monitoring Report
2014 Third Quarter Monitoring Report
2014 Fourth Quarter Monitoring Report
2015 First Quarter Monitoring Report

**GADSDEN, ALABAMA URBANIZED AREA
STORM WATER MANAGEMENT PROGRAM**

NPDES General Permit ALR040009

APPENDIX C – THE CITY OF GADSDEN

- Table 1. 2014-2015 Public Education and Outreach Strategies
- Table 2. 2014-2015 Public Involvement/Participation Strategies
- Table 3. 2014-2015 Illicit Discharge Detection and Elimination Strategies
- Table 4. 2014-2015 Construction Site Storm Water Runoff Control Strategies
- Table 5. 2014-2015 Post-Construction Storm Water Management Strategies
- Table 6. 2014-2015 Pollution Prevention/Good Housekeeping for Municipal Operations

Supporting Documentation

**GADSDEN, ALABAMA URBANIZED AREA
STORM WATER MANAGEMENT PROGRAM**

NPDES General Permit ALR040009

APPENDIX D – RAINBOW CITY

- Table 1. 2014-2015 Public Education and Outreach Strategies
- Table 2. 2014-2015 Public Involvement/Participation Strategies
- Table 3. 2014-2015 Illicit Discharge Detection and Elimination Strategies
- Table 4. 2014-2015 Construction Site Storm Water Runoff Control Strategies
- Table 5. 2014-2015 Post-Construction Storm Water Management Strategies
- Table 6. 2014-2015 Pollution Prevention/Good Housekeeping for Municipal Operations

Supporting Documentation

**GADSDEN, ALABAMA URBANIZED AREA
STORM WATER MANAGEMENT PROGRAM**
NPDES General Permit ALR040009

APPENDIX E – REECE CITY

Supporting Documentation

**GADSDEN, ALABAMA URBANIZED AREA
STORM WATER MANAGEMENT PROGRAM**

NPDES General Permit ALR040009

APPENDIX F – CITY OF SOUTHSIDE

- Table 1. 2014-2015 Public Education and Outreach Strategies
- Table 2. 2014-2015 Public Involvement/Participation Strategies
- Table 3. 2014-2015 Illicit Discharge Detection and Elimination Strategies
- Table 4. 2014-2015 Construction Site Storm Water Runoff Control Strategies
- Table 5. 2014-2015 Post-Construction Storm Water Management Strategies
- Table 6. 2014-2015 Pollution Prevention/Good Housekeeping for Municipal Operations

Supporting Documentation

**GADSDEN, ALABAMA URBANIZED AREA
STORM WATER MANAGEMENT PROGRAM**

NPDES General Permit ALR040009

APPENDIX G – CITY OF GLENCOE

Table 1. 2014-2015 Public Education and Outreach Strategies

Table 2. 2014-2015 Public Involvement/Participation Strategies

Table 3. 2014-2015 Illicit Discharge Detection and Elimination Strategies

Table 4. 2014-2015 Construction Site Storm Water Runoff Control Strategies

Table 5. 2014-2015 Post-Construction Storm Water Management Strategies

Table 6. 2014-2015 Pollution Prevention/Good Housekeeping for Municipal Operations

Supporting Documentation

**GADSDEN, ALABAMA URBANIZED AREA
STORM WATER MANAGEMENT PROGRAM**

NPDES General Permit ALR040009

APPENDIX H – HOKES BLUFF

- Table 1. 2014-2015 Public Education and Outreach Strategies
- Table 2. 2014-2015 Public Involvement/Participation Strategies
- Table 3. 2014-2015 Illicit Discharge Detection and Elimination Strategies
- Table 4. 2014-2015 Construction Site Storm Water Runoff Control Strategies
- Table 5. 2014-2015 Post-Construction Storm Water Management Strategies
- Table 6. 2014-2015 Pollution Prevention/Good Housekeeping for Municipal Operations

Supporting Documentation

**GADSDEN, ALABAMA URBANIZED AREA
STORM WATER MANAGEMENT PROGRAM**

NPDES General Permit ALR040009

APPENDIX I – CITY OF ATTALLA

- Table 1. 2014-2015 Public Education and Outreach Strategies
- Table 2. 2014-2015 Public Involvement/Participation Strategies
- Table 3. 2014-2015 Illicit Discharge Detection and Elimination Strategies
- Table 4. 2014-2015 Construction Site Storm Water Runoff Control Strategies
- Table 5. 2014-2015 Post-Construction Storm Water Management Strategies
- Table 6. 2014-2015 Pollution Prevention/Good Housekeeping for Municipal Operations

Supporting Documentation

**GADSDEN, ALABAMA URBANIZED AREA
STORM WATER MANAGEMENT PROGRAM**

NPDES General Permit ALR040009

APPENDIX J – ETOWAH COUNTY

- Table 1. 2014-2015 Public Education and Outreach Strategies
- Table 2. 2014-2015 Public Involvement/Participation Strategies
- Table 3. 2014-2015 Illicit Discharge Detection and Elimination Strategies
- Table 4. 2014-2015 Construction Site Storm Water Runoff Control Strategies
- Table 5. 2014-2015 Post-Construction Storm Water Management Strategies
- Table 6. 2014-2015 Pollution Prevention/Good Housekeeping for Municipal Operations

Supporting Documentation