



MS4 ANNUAL REPORT

APRIL 1, 2024 - MARCH 31, 2025



PREPARED BY
S&ME, INC.



May 28, 2025

Etowah County Commission
800 Forrest Avenue
Gadsden, Alabama 35901

Attention: Mr. Joey Statum, Commission President

Reference: **Annual Report: April 1, 2024 to March 31, 2025**
Etowah County MS4
Etowah County, Alabama
S&ME Project No. 24820156F
NPDES Permit No. ALR040009

Dear Mr. Ramsey:

S&ME has prepared the attached Annual Report for the Etowah County Phase II Small Municipal Separate Storm Sewer System in accordance with S&ME Proposal No. 24820156F, dated November 15, 2024. The Annual Report covers the April 1, 2024 to March 31, 2025 reporting period.

S&ME appreciates the opportunity to provide our services to Etowah County. Should you have questions concerning this report, or if additional information is required, please contact the undersigned.

Sincerely,

S&ME, Inc.

A handwritten signature in blue ink that reads "Sarah L. Yeldell".

Sarah L. Yeldell, P.E.
Project Manager

A handwritten signature in blue ink that reads "Deborah J. Jones".

Deborah J. Jones, P.E.
Senior Engineer



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1.0 Introduction

S&ME, Inc. has prepared this Annual Report for the Etowah County, Alabama Urbanized Area Phase II Small Municipal Separate Storm Sewer System in accordance with S&ME Proposal No. 24820156F, dated November 15, 2024.

The Annual Report is required by Part VI of the Alabama Department of Environmental Management (ADEM) National Pollutant Discharge Elimination System (NPDES) General Permit ALR040000 for discharges from regulated small municipal separate storm sewer systems (MS4).

1.1 Gadsden, Alabama Urbanized Area

The Storm Water Phase II Final Rule issued by the United States Environmental Protection Agency (USEPA) in 1999 required 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 2010 census, the Bureau of the Census designated the *Gadsden, Alabama Urbanized Area* to include the City of Attalla, the City of Gadsden, the City of Glencoe, the City of Hokes Bluff, City of Rainbow City, the City of Southside, and portions of unincorporated Etowah County.

In March 2022, the Bureau of the Census discontinued the practice of defining "urbanized areas." On June 7, 2023, USEPA issued a final rule clarifying the designation criteria for small MS4s. The rule replaced the term "urbanized area" in the Phase II regulations with the phrase "urban areas with a population of at least 50,000" to assist in identifying new MS4s. In December 2023, revised maps showing the 2020 urban area boundaries were released; however, ADEM has not provided guidance on the application of the 2020 maps in determining boundaries of existing MS4s. As a result, revised MS4 boundaries based on the 2020 Census were not available during the April 1, 2024 to March 31, 2025 reporting period.

A map outlining the approximate boundary of the 2010 *Gadsden, Alabama Urbanized Area* is included in **Appendix A** as **Figure 1**.

1.2 Permit History

The City of Attalla, the City of Gadsden, the City of Glencoe, the City of Hokes Bluff, City of Rainbow City, the City of Southside, and Etowah County initially applied for and received a NPDES MS4 Phase II General Permit from ADEM in 2003, with the seven entities as co-permittees under authorization number ALR040009. The five-year permit expired on March 9, 2008. A Notice of Intent for renewal of the permit was submitted 180 days prior to expiration and permit coverage was administratively continued until the re-issuance of the MS4 Phase II General Permit with an effective date of February 1, 2011.

The 2011 permit expired on February 1, 2016. A Notice of Intent for renewal of the permit was submitted by each entity 180 days prior to expiration; therefore, the permit coverage was extended until the re-issuance of the MS4 Phase II General Permit in September. To assist in compliance tracking, the Gadsden-Etowah MS4 entities were



each issued a separate permit, although the entities agreed to continue under a joint SWMPP and monitoring plan. The Etowah County MS4 was authorized to discharge under authorization number ALR040009 with an effective date of October 1, 2016.

The 2016 permit expired on September 30, 2021. A Notice of Intent for renewal of the permit was submitted 180 days prior to expiration, and the MS4 Phase II General Permit was re-issued with an effective date of October 1, 2021. The current permit will expire on September 30, 2026. Under the new permitting system, Etowah County was required to prepare a separate SWMPP detailing the individual actions taken by the County to comply with the 2021 permit, as well as the joint activities shared with the remaining Gadsden-Etowah MS4 entities.

A copy of the NPDES General Permit is included in the 2025 SWMPP.

1.3 Storm Sewer System

A Municipal Separate Storm Sewer System (MS4) is defined by 40 CFR Part 122.26(b)(8) to be a conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains) that is:

- (i) Owned or operated by a State, city, town, borough, county, parish, district, association, or other public body (created by or pursuant to State law) having jurisdiction over disposal of sewage, industrial wastes, storm water, or other wastes, including special districts under State law such as a sewer district, flood control district or drainage district, or similar entity, or an Indian tribe or an authorized Indian tribal organization, or a designated and approved management agency under section 208 of the CWA that discharges to waters of the United States;
- (ii) Designed or used for collecting or conveying storm water;
- (iii) Not a combined sewer; and,
- (iv) Not part of a Publicly Owned Treatment Works (POTW) as defined at 40 CFR 122.2.

1.4 Etowah County MS4 Area

The Etowah County Municipal Separate Storm Sewer System (Etowah County MS4) is defined as the unincorporated area within both the county and the urbanized area boundary. As defined by the 2010 Census, the *Gadsden, Alabama Urbanized Area* encompasses approximately 74.8 square miles. The Etowah County MS4 comprises approximately 12.7 square miles (17%) of the 2010 *Gadsden, Alabama Urbanized Area*. A map depicting the Etowah County MS4 limits is located in **Appendix A** as **Figure 2**.

1.4.1 Hydrologic Units in the Urbanized Area

Neely Henry Lake (Coosa River) is the primary receiving water for the Etowah County MS4. Hydrologic Hierarchy, Watersheds, and Subwatersheds are provided in the tables below.



Table 1-1 Hydrologic Hierarchy

Type	Code	Name
REGION	03	South Atlantic-Gulf
SUBREGION	03-15	Alabama River Basin
BASIN	0315-01	Coosa-Tallapoosa: Above the confluence of and including the Coosa and Tallapoosa River Basins
SUBBASIN	031501-06	Middle Coosa

Table 1-2 Watersheds in the MS4 Area

Watershed	10 Digit HUC
Big Wills Creek	03150106-01
Black Creek-Coosa River	03150106-02
Big Canoe Creek- Coosa River	03150106-03

Table 1-3 Subwatersheds in the Etowah County MS4 Area

Subwatershed	12 Digit HUC	Total Area (Acres)	Area within Etowah County MS4 (Acres)
Big Cove Creek	03150106-02-03	18,082	178
Black Creek	03150106-01-07	40,879	554
Coosa River-H. Neely Henry Lake	03150106-03-09	46,439	4,084
Horton Creek	03150106-01-08	16,902	1,823
Little Wills Creek	03150106-01-06	18,151	279
Lower Big Canoe Creek	03150106-03-06	33,306	52
Thorton Lakes-Dry Creek	03150106-02-02	9,777	24
Turkey Town Creek	03150106-02-04	57,474	1,126

A map showing the HUC12 subwatersheds in relation to the Etowah County MS4 boundary is included in the 2022 SWMPP.



1.5 Responsible Party

The **Etowah County Engineering Department** is responsible for the coordination and implementation of the Storm Water Management Program Plan. Coordination between County departments is established in each section of the SWMPP.

The **Storm Water Steering Committee** is responsible for the implementation of the monitoring plan.

1.6 Annual Report Components

Part VI of the NPDES General Permit requires that the Etowah County MS4 prepare and submit annual reports to the ADEM each year by May 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. Contacts and responsible parties who had input to and are responsible for the preparation of the annual report
2. Overall evaluation of the SWMPP-developments and progress on the following:
 - a. Major accomplishments
 - b. Overall program strengths/weaknesses
 - c. Future direction of the program
 - d. Overall determination of the effectiveness of the SWMPP considering water quality/watershed improvements
 - e. Measurable goals that were not performed and reasons why the goals were not accomplished
 - f. Evaluation of the monitoring data
3. A narrative report of all minimum storm water control measures referenced in the permit to include the following:
 - a. Minimum control measures completed and in progress
 - b. Assessment of the controls
 - c. Discussion of proposed BMP revisions or any identified measurable goals that apply to the minimum storm water control measures
4. Summary table of the storm water controls that are planned/scheduled for the next reporting cycle
5. Results of information collected and analyzed during the reporting period including monitoring data used to assess the success of the program at reducing the discharge of pollutants to the Maximum Extent Practical (MEP)
6. Notice of reliance on another entity to satisfy some of your permit obligations

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7. Results of the evaluation to determine whether discharges from any part of the MS4 contributes directly or indirectly to a waterbody that is included on the latest 303(d) list or for which a TMDL has been established or approved by EPA
8. All monitoring results collected during the reporting period

This Annual Report covers activities performed during the April 1, 2024 to March 31, 2025 reporting period under the SWMPP dated February 2025.

2.0 Contacts List

Reference Part VI.B.1

Part VI.B.1 of the NPDES Permit requires that the Etowah County provide a list of contacts and responsible parties involved in the preparation of the Annual Report. The following personnel were directly responsible for the preparation of the 2024-2025 Annual Report:

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Questions concerning the 2024-2025 Annual Report should be directed to the **Engineering Department**.



3.0 Evaluation of Water Quality Concerns

Reference Part VI.B.7

Section 303(d) of the Clean Water Act (CWA), as amended by the Water Quality Act of 1987, and EPA's 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. The identified waters are prioritized based on severity of the pollution. 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. The TMDL process establishes the allowable loading of pollutants, or other quantifiable parameters for a waterbody, based on the relationship between pollution sources and in-stream water quality conditions.

Maps showing the impaired waterbodies in relation to the Etowah County MS4 is provided in **Appendix A** as **Figure 3** and **Figure 4**.

3.1.1 Impaired Waterbodies Within the MS4

Table 3-1 identifies the impaired waterbodies located within the Etowah County MS4 boundary.

Table 3-1 Impaired Waterbodies within the MS4

Waterbody	Impaired Segment	Type	Causes	Use
Big Wills Creek	AL03150106-0108-102	TMDL (2024)	Pathogens (E. coli)	S F&W
Black Creek Embayment (Neely Henry Lake)	AL03150106-0107-111	303(d) (2018)	Nutrients	F&W
Big Wills Creek Embayment (Neely Henry Lake)	AL03150106-0108-111	303(d) (2018)	Nutrients	F&W
Coosa River (Neely Henry Lake)	AL03150106-0204-102	TMDL (2008)	Nutrients pH Organic Enrichment (CBOD, NBOD)	PWS S F&W

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Waterbody	Impaired Segment	Type	Causes	Use
Coosa River (Neely Henry Lake)	AL03150106-0309-102	TMDL (2008)	Nutrients Organic enrichment (DO)	F&W
Cove Creek Embayment (Neely Henry Lake)	AL03150106-0203-111	TMDL (2008)	Nutrients pH Organic Enrichment (CBOD, NBOD)	PWS F&W

3.1.2 *Impaired Watersheds Intersecting the MS4*

In addition to the impaired waterbodies, the Etowah County MS4 encompasses portions of watersheds for the following impaired waterbodies:

Table 3-2 Portions of Impaired Watersheds within the MS4

Watershed	Impaired Segment	Type	Causes	Use
Big Wills Creek	AL03150106-0108-102	TMDL (2024)	Pathogens (E. coli)	S F&W
Black Creek Embayment (Neely Henry Lake)	AL03150106-0107-111	303(d) (2018)	Nutrients	F&W
Big Wills Creek Embayment (Neely Henry Lake)	AL03150106-0108-111	303(d) (2018)	Nutrients	F&W
Coosa River (Neely Henry Lake)	AL03150106-0204-102	TMDL (2008)	Nutrients pH Organic Enrichment (CBOD, NBOD) Priority Organics (PCBs)	PWS F&W



Watershed	Impaired Segment	Type	Causes	Use
Coosa River (Neely Henry Lake)	AL03150106-0204-101	TMDL (2008)	Nutrients pH Organic Enrichment (CBOD, NBOD)	F&W
Coosa River (Neely Henry Lake)	AL03150106-0309-102	TMDL (2008)	Nutrients pH Organic Enrichment (CBOD, NBOD)	F&W
Cove Creek Embayment (Neely Henry Lake)	AL03150106-0203-111	TMDL (2008)	Nutrients pH Organic Enrichment (CBOD, NBOD)	PWS F&W

3.1.3 *Neely Henry Lake TMDL*

In 2008, the EPA approved TMDLs for Neely Henry Lake related to Nutrients (Total Phosphorous), pH, and Organic Enrichment/Dissolved Oxygen. The Etowah County MS4 directly and indirectly discharges to Neely Henry Lake; therefore, **the Etowah County MS4 is required to achieve a 30% reduction in Total Phosphorus discharge loading.**

Sources of nutrient and organic enrichment from non-point sources within the Coosa River watershed include:

- Runoff from pastures
- Runoff from animal operations
- Direct discharge to streams due to cattle
- Improper land application of animal waste
- Failing septic systems
- Urban runoff

Point source contributors of storm water pollution within the Coosa River watershed include:

- Discharge from wastewater treatment plants
- Discharge from industrial operations

Part IV.D of the NPDES General Permit requires that the County implement Best Management Practices (BMPs) and control measures specifically targeted to achieve the waste load allocations prescribed in the TMDL. The County must also implement a monitoring program to document that the waste load allocations prescribed in the TMDL are being achieved.



3.1.4 *Big Wills Creek TMDL*

In 2024, the EPA approved TMDLs related to *E. coli* for two segments of Big Wills Creek and four tributaries to Big Wills Creek. The Etowah County MS4 directly and indirectly discharges to one of the impaired segments of Big Wills Creek; therefore, **the Etowah County MS4 is required to achieve a 96% reduction in *E. coli* discharge loading.**

Sources of pathogens from non-point sources within the Big Wills Creek watershed include:

- Runoff from pastures
- Runoff from animal feeding areas
- Direct discharge to streams due to cattle
- Improper land application of animal waste
- Failing septic systems
- Urban runoff
- Point source contributors of pathogens within the Big Wills Creek watershed include:
 - Sanitary sewer overflows (SSOs)
 - Discharge from wastewater treatment plants/lagoons
 - Industrial sources
 - Concentrated animal feeding operations

Part IV.D of the NPDES General Permit requires that the SWMPP include BMPs and control measures specifically targeted to achieve the waste load allocations prescribed in the TMDL. The SWMPP must also include monitoring provisions to document that the waste load allocations prescribed in the TMDL are being achieved.



4.0 Overall Program Evaluation

Reference Part VI.B.2

4.1 Major Accomplishments

During the 2024-2025 reporting period, the County completed 70 out of 71 planned strategies and 11 additional strategies. The number of completed activities (81) demonstrates the County's commitment to implement the SWMPP and Phase II Permit by going beyond the strategies they committed to in the 2025 SWMPP.

1. Added personnel

A shortage of storm water program staff has been a continual weakness of the County program. During the 2024-2025 reporting period, the Etowah County Engineering Department brought in Brian Rosenbalm to assist with storm water compliance. This brings the total number of County personnel executing the storm water program to three, which has improved the County's ability to implement the SWMPP.

2. Decreased littering

During the 2023-2024 reporting period, crews collected 34.97 tons of litter over 385.6 miles. During the 2024-2025 reporting period, crews collected 41.28 tons of litter over 684.91 miles, of which 18.95 tons was recyclable.

The decrease in the amount of litter per mile collected indicates that the County's efforts to prevent littering and to educate the public on proper disposal are succeeding.

3. Increased public involvement

The County partnered with several groups to promote public education and involvement. Numerous events were held through Keep Etowah Beautiful. One hundred and sixty-five (165) adult volunteers participated in the *Etowah County Water Festival*, 729 volunteers participated in *Renew Our Rivers*, and 768 volunteers participated in the Great American Cleanup.

When compared to the same events held during the previous reporting period, an additional 306 volunteers participated in *Renew Our Rivers*, an additional 233 volunteers participated in the Great American Cleanup, and an additional 107 adult volunteers participated in the water festival.

4. Performed outfall inspections

Etowah County continued to perform outfall inspections as required by the MS4 permit. During the 2024-2025 reporting period, 16 of the 48 known outfalls were inspected. Dry weather flows were observed at twelve outfalls, but no suspect illicit discharges were identified.



5. Revised the SWMPP and wet-weather monitoring program

In response to the issuance of new TMDLs for pathogens in Big Wills Creek, the Etowah County MS4 revised the SWMPP and prepared the 2025 *Etowah Monitoring Partnership Wet Weather Monitoring Program* to include E. coli monitoring at three existing monitoring locations. The revised SWMPP also included the addition of BMPs targeting pathogens.

4.2 Overall Programs Strengths and Weaknesses

The County continues to evaluate the processes and procedures by which it accomplishes the objectives of the SWMPP.

The biggest strength is Keep Etowah County Beautiful (KEB). The County created KEB to plan, coordinate, document, and complete public educational and involvement activities to create a love for the County and to increase participation in cleanup activities. KEB is a significant strength of the Public Education and Involvement Control Measure. KEB not only contributes to the County's success, but also contributes to the success of the Cities within the County.

A weakness of the program is the increasing difficulty of public outreach. The County does not maintain social media accounts, which limits direct public outreach efforts to County Commission meetings, hardcopy educational materials, and the storm water webpage, all of which have seen less engagement over the years. The County relies instead on strong partnerships with outreach organizations like KEB to promote storm water educational materials and events.

An additional weakness is the limits of the County's authority to regulate and inspect. In Etowah County, Home Rule is limited by the 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 would require action from the Alabama Legislature to gain that ability. This is a weakness to the program that is unavoidable at this time.

4.3 Future Direction of the Program

During the upcoming reporting period, the County will continue to maintain partnerships with KEB, Alabama People Against a Littered State (ALPALS), the National Resources Conservation Service (NRCS), and the Alabama Cooperative Extension Office (ACES), as well as the surrounding communities. The County will also continue participation in the Alabama Stormwater Association (ASA) and the Gadsden-Etowah MS4 Steering Committee.

Etowah County is committed to educating citizens on the SWMPP Program and how their actions can impact storm water and the Coosa River.

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4.4 Overall Effectiveness of the SWMPP

Etowah County is proud of their efforts to achieve the objectives of the SWMPP. Based on this evaluation, the 2025 SWMPP appears to have been effective in meeting the objectives and requirements of the 2021 Phase II Permit.

4.5 Measurable Goals Not Performed

Due to scheduling conflicts, the County was not able to participate in Alabama Stormwater Association activities this year. The County will make an effort to participate during the 2025-2026 reporting period.



5.0 Storm Water Monitoring Data Evaluation

Reference Part VI.B.5 and 8

5.1 Rationale Statement

As discussed in Section 3.0, the Etowah County MS4 currently discharges to impaired waterbodies for which TMDLs have been approved. Part V.A of the 2021 MS4 Permit requires that the SWMPP include a monitoring plan to assess the effectiveness of the BMPs in achieving the waste load reductions/allocations outlined in the TMDLs.

The intent of the monitoring program is to evaluate the effectiveness of the County's BMPs in achieving the required phosphorous and E. coli reductions as established in the TMDLs and to generally evaluate overall water quality. Where deviations are documented and/or expected, the collected monitoring data will be used to determine the extent and cause of the pollutant of concern.

The 2025 *Etowah Monitoring Partnership Wet Weather Monitoring Program* is included as Appendix C of the SWMPP dated February 2025. The program details monitoring parameters, monitoring locations, field documentation, and sampling procedures.

5.2 Monitoring Events

Beginning in January 2013, S&ME was retained by the Gadsden-Etowah Storm Water Steering Committee to collect the required quarterly surface water samples and provide analyses of the sampling events. On March 24, 2015, the cities of Attalla, Gadsden, Glencoe, Hokes Bluff, Rainbow City, and Southside and Etowah County entered into a Cooperative Agreement to jointly perform the quarterly monitoring.

Beginning in October 2023, the City of Gadsden elected to separate from the joint monitoring agreement and perform their own monitoring. The cities of Attalla, Glencoe, Hokes Bluff, Rainbow City, and Southside and Etowah County have continued to jointly perform the quarterly wet-weather monitoring. Monitoring events conducted since October 2023 do not include monitoring points CO 15, GD 6, GD 7, GD 8, or GD 9.

Table 5-1 Monitoring Events to Date

MS4 Reporting Period	Monitoring Event	Date(s) Monitoring Conducted
April 1, 2012 – March 31, 2013	2013 Q1	March 12 & 13, 2013
April 1, 2013 – March 31, 2014	2013 Q2	May 8 & 20, 2013
	2013 Q3	September 23, 2013
	2013 Q4	December 10, 2013
	2014 Q1	February 6, 2014

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MS4 Reporting Period	Monitoring Event	Date(s) Monitoring Conducted
April 1, 2014 – March 31, 2015	2014 Q2	June 26, 2014
	2014 Q3	September 30, 2014
	2014 Q4	November 19, 2014
	2015 Q1	March 23, 2015
April 1, 2015 – March 31, 2016	2015 Q2	April 22, 2015
	2015 Q3	September 30, 2015
	2015 Q4	November 19, 2015
	2016 Q1	March 15, 2016
April 1, 2016 – March 31, 2017	2016 Q2	June 29, 2016
	2016 Q3	August 9, 2016
	2016 Q4	December 7, 2016
	2017 Q1	March 2, 2017
April 1, 2017 – March 31, 2018	2017 Q2	June 21, 29, 30 and July 5, 2017
	2017 Q3	August 16-17, 2017
	2017 Q4	October 25-26, 2017
	2018 Q1	March 27-28, 2018
April 1, 2018 – March 31, 2019	2018 Q2	June 26 and 29, 2018
	2018 Q3	August 1-2, 2018
	2018 Q4	December 10-11, 2018
	2019 Q1	April 15 and 17, 2019
April 1, 2019 – March 31, 2020	2019 Q2	June 11-12, 2019
	2019 Q3	August 27-28, 2019
	2019 Q4	October 29-30, 2019
	2020 Q1	March 30-31, 2020
April 1, 2020 – March 31, 2021	2020 Q2	June 10, 2020
	2020 Q3	September 21, 2020
	2020 Q4	December 17, 2020
	2021 Q1	March 18, 2021
April 1, 2021 – March 31, 2022	2021 Q2	May 5, 2021
	2021 Q3	September 2, 2021
	2021 Q4	November 23, 2021
	2022 Q1	January 10-11, 2022

Annual Report: April 1, 2024 to March 31, 2025

Etowah County MS4

Etowah County, Alabama

NPDES Permit No. ALR040009



MS4 Reporting Period	Monitoring Event	Date(s) Monitoring Conducted
April 1, 2022 – March 31, 2023	2022 Q2	April 7, 2022
	2022 Q3	August 2-3, 2022
	2022 Q4	November 16, 2022
	2023 Q1	February 13-14, 2023
April 1, 2023 – March 31, 2024	2023 Q2	May 24-25, 2023
	2023 Q3	August 7, 2023
	2023 Q4	December 12, 2023
	2024 Q1	January 10, 2024
April 1, 2024 – March 31, 2025	2024 Q2	May 20-21, 2024
	2024 Q3	September 16, 2024
	2024 Q4	December 11, 2024
	2025 Q1	February 18, 2025

A monitoring report was issued to the members of the Steering Committee following each monitoring event. Copies of the reports for the monitoring events conducted during the April 1, 2024 to March 31, 2025 reporting period are provided in **Appendix C**.

5.3 Addition and Removal of Monitoring Points

No monitoring points were added or removed from the program during the April 1, 2024 to March 31, 2025 reporting period.

5.4 Additional Parameters

In August 2024, the EPA approved TMDLs for E. coli for two segments of Big Wills Creek and four tributaries to Big Wills Creek. One of these segments receives discharges from the Attalla MS4 and Etowah County MS4. In February 2025, the wet-weather monitoring program was revised to add pathogens monitoring in Big Wills Creek as part of the monitoring program. The County's SWMPP was updated in February 2025 to include the revised 2025 *Etowah Monitoring Partnership Wet Weather Monitoring Program*. Pathogens monitoring was first conducted during the February 18, 2025 monitoring event.

5.5 Statistical Analysis

A total of 49 quarterly monitoring events have been conducted since the Monitoring Program was first implemented in March of 2013. Charts 1 through 10 in **Appendix B** summarize the analytical data collected during these monitoring events.

Statistical analysis was performed on the cumulative monitoring data to evaluate trends and to determine whether there has been a statistically significant increase (SSI) of concentrations between specific monitoring points.



For the current statistical analysis, S&ME performed the statistical evaluation using the ChemStat Version 6.5 software produced by Starpoint Software. The appropriate statistical procedure used in this evaluation was determined by the characteristics of the data set. The approach used to determine the appropriate statistical evaluation and the results of the statistical evaluation are summarized in the following paragraphs.

Specific monitoring points were chosen for comparison based on their location within the MS4 area respective to other monitoring point locations and the trend of collected data. Detailed results are given in **Appendix B**.

5.5.1 *Approach to Statistical Analysis*

Essentially, there are two sets of data to be compared during this statistical evaluation. Sen's non-parametric estimator of slope is a method of estimating the slope (change in concentration over time) of the data. Because this method is non-parametric, it is suitable for high percentage of non-detects and is not significantly affected by outliers. The result indicates whether there is an upward, downward, or no trend in the concentration data.

The Wilcoxon rank-sum test evaluates potential differences in the medians of two populations. The Wilcoxon rank-sum test can be used to compare a single data group against another data group. In this evaluation, we compared the specific monitoring points to determine if a statistically significant difference is present in a monitoring point using a statistical significance value (alpha) of 0.01. If a statistically significant difference was observed, we then compared the median values of each point to evaluate whether a point had a statistically significant increase (SSI) over the background point.

The following laboratory parameters were evaluated in the statistical analysis:

- Total Suspended Solids (TSS)
- Total Phosphorous
- Orthophosphate
- Nitrate-Nitrite
- Total Kjeldahl Nitrogen (TKN)

E. coli was not included in the 2024-2025 statistical evaluation due to a lack of data.

5.5.2 *Change in Concentration Over Time*

Table 5-2 below lists the points and parameters for which a trend was indicated by the Sen's Slope Analysis. The remaining assessed parameters have no trend in the slope.

Table 5-2 Summary of Results of Slope Analysis

Point Analyzed	Parameter	Trend
SME 7	Ortho-phosphate	Upward
SME 7	Nitrate-nitrite	Upward



Point Analyzed	Parameter	Trend
SS 13	TKN	Upward
SME 4	TKN	Upward
SME 5	TKN	Upward
GD 12	TSS	Downward

5.5.3 Statistically Significant Increases

Table 5-3 below reports the statistical evaluation for statistically significant increases (SSIs) for a summary of parameters and monitoring point comparisons.

Table 5-3 Summary of Results of SSIs

Point Analyzed	Point of Comparison	SSI Identified	Parameters w/ SSI
AT 5	SME 7	No	-
GD 5	SME 4	No	-
GD 12	SME 4	No	-
HB 3	SME 4	Yes	TSS
RC 2	SME 1	No	-
RC 2	SME 4	No	-
RC 14	SME 4	No	-
SME 1	SME 4	Yes	Ortho-phosphate, Total Phosphorus
SME 1	AT 5	No	-
SME 3	SME 4	No	-
SME 5	SME 4	No	-
SME 6	SME 4	No	-
SME 6	SME 5	No	-
SME 7	SME 4	Yes	Nitrate-Nitrite, Ortho-phosphate, Total Phosphorus
SME 9	HB 3	No	-
SME 9	SME 4	No	-
SME 10	GD 5	Yes	TSS
SME 10	SME 4	No	-
SS 5	SME 4	No	-
SS 13	SME 4	Yes	TKN
SS 14	SME 4	Yes	TKN, Ortho-phosphate, Total Phosphorus, Nitrate-nitrite



5.6 Evaluation of Monitoring Results

The results of the slope analysis indicate that, although fluctuations occur from one monitoring event to another, pollutant concentrations in the MS4 waterbodies have remained generally consistent over the past 12 years at 17 of the 22 monitoring points. The exceptions are SME 7 (Big Wills Creek), where an upward trend was observed for ortho-phosphate and nitrate-nitrite, and at SS 13 (unnamed tributary to Neely Henry Lake) where an upward trend was identified for TKN. An upwards trend for TKN was also identified at SME 4 and SME 5 (Neely Henry Lake). A downward trend was observed in GD 12 (unnamed tributary to Neely Henry Lake) for TSS.

5.6.1 Monitoring Points SME 4, SME 5, and SME 6

Monitoring points SME 4, 5, and 6 were sited to assess water quality in the Coosa River where it enters the urbanized area, in the central portion of the urbanized area, and where it leaves the urbanized area, respectively, as shown in Diagram 1. The points were first sampled in December 2020, and a total of fourteen monitoring events have been completed since, with the exception of SME 4 which was not sampled in September 2021.

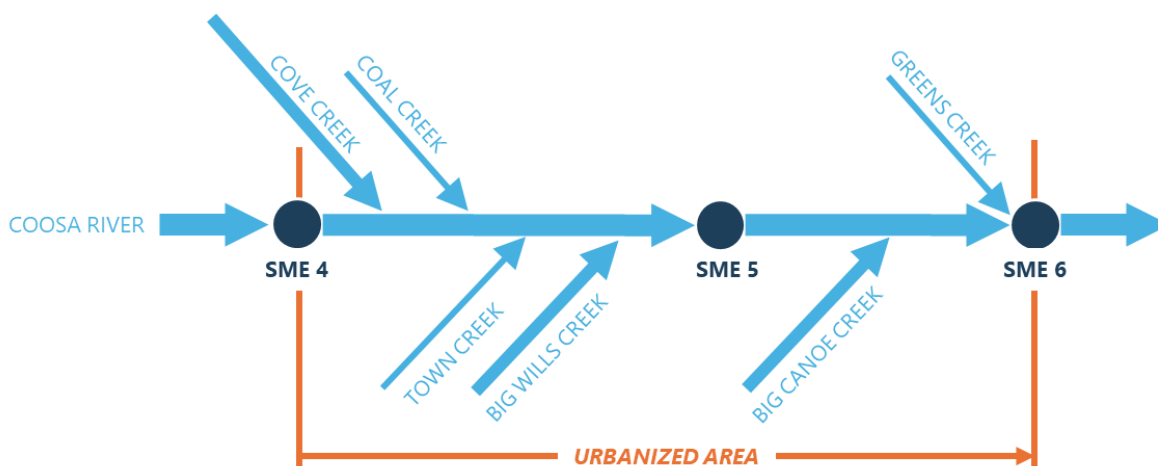


Diagram 1. Coosa River Monitoring Points

Over the past eighteen monitoring events, turbidity increased between monitoring points SME 4 and SME 6 thirteen times and decreased four times, with one event not sampled. Total nitrogen increased in ten of the seventeen monitoring events and TSS increased in fourteen of the seventeen events. Ortho-phosphate was detected in three events at monitoring points SME 4 and SME 5 and was detected twice at SME 6. Total phosphorous increased in six of the seventeen events.

The upwards trends identified for TKN in SME 4 and SME 5 indicate that TKN is increasing in the Coosa River upstream of the urbanized area; however, as shown in Table 5-3, no SSIs were observed when the downstream Coosa River points were compared to the upstream river points. **These results indicate that no statistically significant increase in pollutants is occurring in the Coosa River due to runoff from the urbanized area.**



The Attalla, Glencoe, Hokes Bluff, Rainbow City, Southside, and Etowah County MS4s will continue to monitor points SME 4, SME 5, and SME 6 during the April 1, 2025 to March 31, 2026 reporting period.

5.6.2 *Monitoring Points AT 5 and SME 7*

Monitoring point SME 7 is located in Big Wills Creek, upstream of monitoring point AT 5, as shown in Diagram 2. Monitoring point AT 5 is located in Big Wills Creek, downstream of its confluence with Little Wills Creek. Monitoring point SME 7 was first sampled in December 2020, and a total of eighteen monitoring events have been completed.



Diagram 2. Big Wills Creek Monitoring Points

As previously discussed, based on the slope analysis, an upward trend was observed at SME 7 for ortho-phosphate and nitrate-nitrite; however, no corresponding upward trend was observed downstream at AT 5. Nitrate-nitrite decreased between SME 7 and AT 5 in fourteen out of the last eighteen monitoring events, ortho-phosphate decreased thirteen out of the last eighteen monitoring events, and total phosphorus decreased between the two points in fourteen of the last eighteen events.

As shown in Table 5-3, no SSIs were observed when AT 5 was compared to SME 7 upstream, indicating that an increase in pollutant concentrations is not occurring as Big Wills Creek passes through the Attalla and Etowah County MS4s, possibly due to dilution as other waterbodies (specifically Little Wills Creek) and runoff enter Big Wills Creek. The pollutants in Big Wills Creek are generally from outside of the MS4, and the urbanized area does not appear to be contributing additional pollution to the waterbody.

As shown in Table 5-3, SSIs for nitrate-nitrite, ortho-phosphate, and total phosphorus were noted when SME 7 was compared to the Coosa River (SME 4), indicating that the pollutant concentrations in Big Wills Creek are higher than the concentrations upstream in the Coosa; however, as previously discussed, no SSIs were observed when the downstream Coosa River points were compared to the upstream river points. **These results indicate that although Big Wills Creek is a source of pollutants to the Coosa River, the flow is not sufficient to cause an observable impact on the Coosa River.**

The Attalla, Glencoe, Hokes Bluff, Rainbow City, Southside, and Etowah County MS4s will continue to monitor points SME 7 and AT 5 during the April 1, 2025 to March 31, 2026 reporting period.



5.6.3 *Monitoring Point SME 1*

Monitoring point SME 1 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, as shown in Diagram 3. Monitoring point AT 5 is located in Big Wills Creek, monitoring point GD 8 (which is currently monitored by the City of Gadsden) is located in Black Creek, and monitoring point RC 2 is located in Horton Creek. The monitoring points were first sampled in March 2013, and a total of 49 monitoring events have been completed.

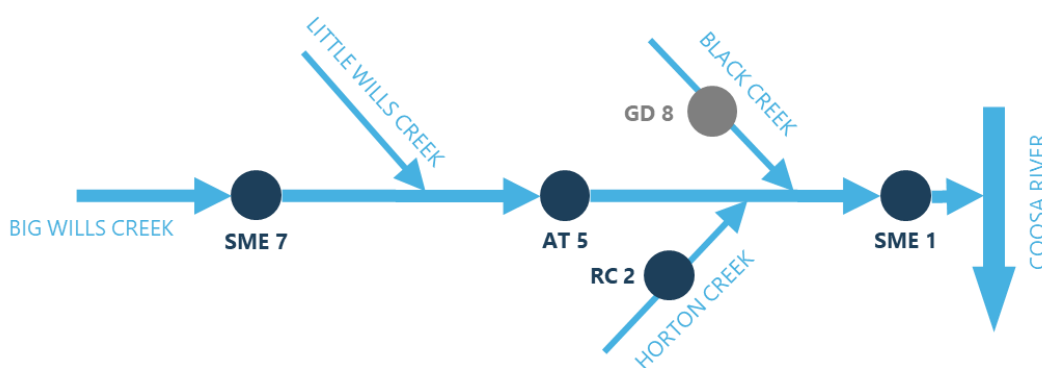


Diagram 3. Big Wills Creek/Black Creek Embayment Monitoring Points

Generally, nitrogen and phosphorous results at AT 5 are higher than those recorded downstream at SME 1, whereas nitrogen and phosphorous values at RC 2 are lower than those recorded at downstream SME 1. As shown in Table 5-3, no SSIs were observed when SME 1 was compared to upstream point AT 5, indicating that an increase in pollutant concentrations is not occurring before the combined flow from AT 5, GD 8, and RC 2 discharges to the Coosa River.

These results indicate that the Big Wills Creek watershed is the primary source of nitrogen and phosphorous approaching SME 1. A portion of the observed reduction between AT 5 and SME 1 may come from dilution as other waterbodies and runoff join Big Wills Creek. This further indicates that the urbanized area is not contributing additional pollution to the Coosa River.

The Attalla, Glencoe, Hokes Bluff, Rainbow City, Southside, and Etowah County MS4s will continue to monitor points AT 5, RC 2, and SME 1 during the April 1, 2025 to March 31, 2026 reporting period.

5.6.4 *Monitoring Point SS 14*

Monitoring point SS 14 was sited to observe water quality in an unnamed tributary to the Coosa River in Southside, as shown in in Diagram 4. The drainage area for SS 14 includes portions of the Southside and Etowah County MS4s, as well as areas outside of the MS4 boundary. Land uses in the SS 14 drainage area include residential, commercial, recreational, and agricultural. The monitoring point was first sampled in March 2013, and a total of 49 monitoring events have been completed.

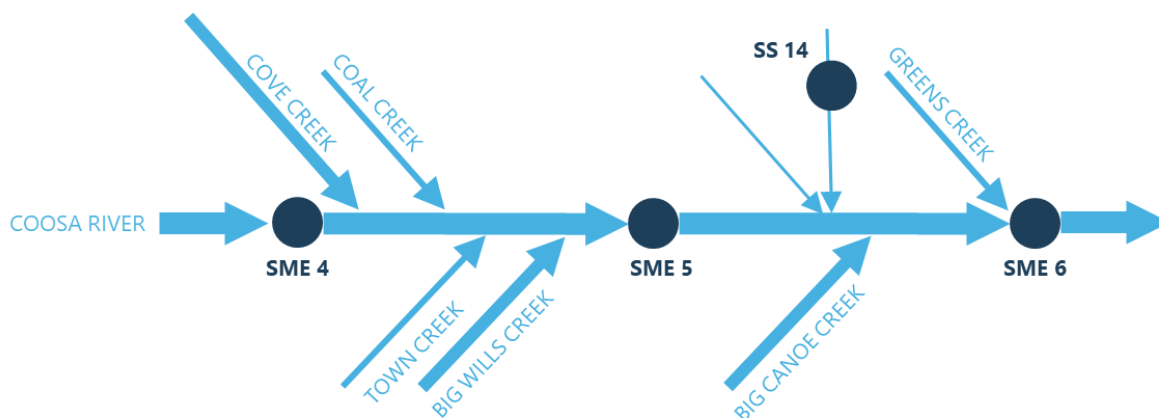


Diagram 4. Monitoring Point SS 14

As shown in Table 5-3, SSIs for TKN, nitrate-nitrite, ortho-phosphate, and total phosphorus were noted when point SS 14 was compared to SME 4. The monitoring results for TKN, nitrate-nitrite, ortho-phosphate, and total phosphorous at SS 14 indicate that concentrations in the unnamed tributary are higher than those observed in the river as it enters the urbanized area; however, there is no clear increase in the levels of TKN, nitrate-nitrite, phosphorus, and ortho-phosphate in the receiving water between SME 5 (Coosa River upstream of SS 14) and SME 6 (Coosa River downstream of SS 14). **These results indicate that although the unnamed tributary to the Coosa River is a source of pollutants to the Coosa River, the flow is not sufficient to cause an observable impact on the Coosa River.** Additionally, based on the results of the slope analysis, measured pollutant concentrations at SS 14 appear to have remained generally consistent over the past 12 years and are not increasing.

The Attalla, Glencoe, Hokes Bluff, Rainbow City, Southside, and Etowah County MS4s will continue to monitor points SS 14, SME 5, and SME 6 during the April 1, 2025 to March 31, 2026 monitoring period.

5.6.5 *Monitoring Point SS 13*

An upward trend was also observed for TKN concentrations at SS 13. Monitoring point SS 13 was sited to observe water quality in an unnamed tributary to the Coosa River in Southside, as shown in Diagram 5. The drainage area for SS 13 includes portions of the Southside and Etowah County MS4s. Land uses in the SS 13 drainage area include residential, recreational, and agricultural.

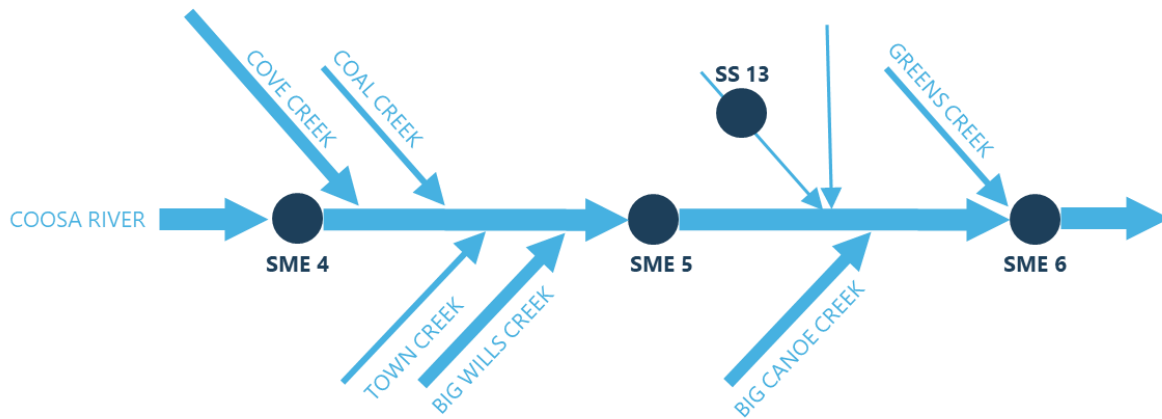


Diagram 5. Monitoring Point SS-13

As shown in Table 5-3, SSIs for TKN were observed at point SS 13 when compared to SME 4. This indicates that TKN concentrations in the tributary to the Coosa River are generally higher than TKN concentrations in the river as it enters the urbanized; however, there is no clear increase in the levels of TKN in the receiving water between SME 4 (Coosa River upstream) and SME 6 (Coosa River downstream). This seems to indicate that although levels of TKN are elevated at SS 13, the flow from the associated drainage areas is not sufficient to cause a statistically significant impact on the Coosa River.

5.6.6 *Total Suspended Solids*

With the exception of monitoring point GD 12, TSS concentrations in the MS4 waterbodies have remained generally consistent over the past 12 years. A downward trend was observed for TSS concentrations at GD 12. Monitoring point GD 12 was sited to observe water quality in an unnamed tributary to the Coosa River in Etowah County, as shown in Diagram 6. The drainage area for GD 12 includes portions of the Etowah County MS4. Land uses in the GD 12 drainage area include residential, recreational, and agricultural.

Monitoring point HB 3 was sited to observe water quality in an unnamed tributary to the Coosa River in Hokes Bluff. As shown in Table 5-3, an SSI for TSS was observed at point HB 3 when compared to SME 4. This indicates that TSS concentrations in the tributary from Hokes Bluff are generally higher than TSS concentrations in the river as it enters the Urbanized area.

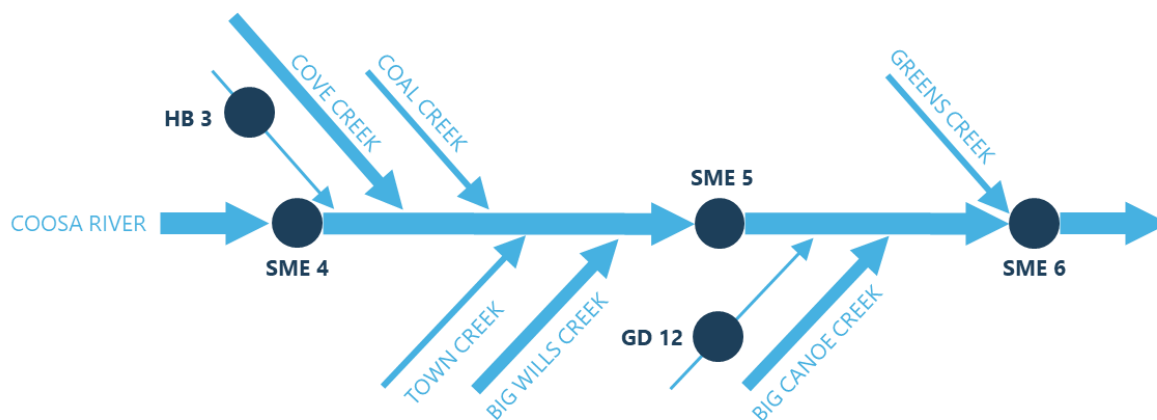


Diagram 6. Monitoring Points HB 3 and GD 12

Monitoring point SME 10 was sited to observe water quality in an unnamed tributary to Big Cove Creek in Hokes Bluff. Monitoring point GS 5 was sited downstream in the Cove Creek Embayment, as shown in Diagram 7. As shown in Table 5-3, an SSI for TSS was observed at monitoring point SME 10 when compared to GD 5. This indicates that TSS concentrations leaving Hokes Bluff are higher than those observed in the Cove Creek Embayment.

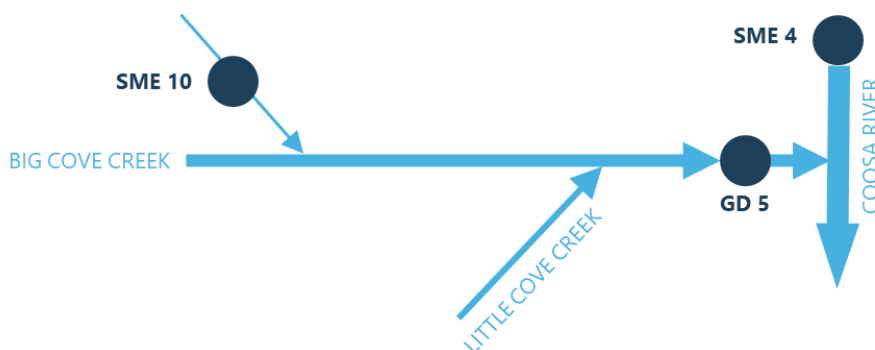


Diagram 7. Monitoring Points SME 10 and GD 5

There is no clear increase in the levels of TSS between SME 4 (Coosa River upstream) and SME 6 (Coosa River downstream). This seems to indicate that although levels of TSS are elevated at HB 3 and SME 10, the flow from the associated drainage areas is not sufficient to cause a statistically significant impact on the Coosa River.

5.7 Summary of Recommendations

The entities that comprise the Gadsden-Etowah MS4 initially took a watershed approach regarding their storm water monitoring program. This approach has allowed the entities to evaluate how the overall watershed is responding to the established BMPs and to generally evaluate water quality across the MS4. The current *Wet-Weather Monitoring Program* went into effect February 2025.

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During the April 1 2025, to March 31, 2026 reporting period, the Gadsden-Etowah MS4 entities will meet to discuss changes to the 2025 *Wet-Weather Monitoring Program*, including whether to continue the watershed approach or evaluate each MS4 separately. The current monitoring points are adequate for evaluating the watershed and the Gadsden-Etowah MS4 entities as a group; however, the existing points do not provide the density needed to evaluate each MS4 separately. If the steering committee were to elect to evaluate the MS4 independently, additional monitoring points would be required.

No changes to the current monitoring program are recommended at this time.



6.0 Narrative Report of Minimum Storm Water Control Measures

Reference Part VI.B.3 and 4

6.1 Public Education and Public Involvement on Storm Water Impacts

6.1.1 *Implementation Status*

During the April 1, 2024 to March 31, 2025 reporting period, Etowah County completed fifteen (15) of the sixteen (16) Public Education and Public Involvement strategies identified in the previous Annual Report, the 2022 SWMPP, and the 2025 SWMPP.

The County did not complete one (1) strategy:

- Due to scheduling conflicts, County personnel did not participate in Alabama Stormwater Association activities during the 2024-2025 reporting period (Strategy 9).

The County completed nine (9) strategies beyond those proposed in the previous Annual Report, the 2022 SWMPP, and the 2025 SWMPP. These strategies included:

- Partnering with The Great American Cleanup (Strategy 17)
- Sponsoring a Drug Collection Day (Strategy 18)
- Enforcing a Litter Ordinance (Strategy 19)
- Providing dead animal removal from roadside (Strategy 20)
- Providing a recycling program for aluminum cans and scrap metal (Strategy 21)
- Clearing drainage structures of trees and brush (Strategy 22)
- Working to reduce runoff by monitoring areas of erosion and providing solutions (Strategy 23)
- Allowing a cardboard collection trailer to be placed at the Courthouse in support of Gadsden's cardboard recycling program (Strategy 24)
- Promoting a water quality awareness week (Strategy 25)

A table identifying each Public Education and Public Involvement strategy planned for the 2024-2025 reporting period, a description of actions taken by Etowah County, and a description of activities planned for the next reporting period is provided at the end of this section. Supporting documentation is included in **Appendix D**.

6.1.2 *Proposed Activities for the April 1, 2025 to March 31, 2026 Reporting Period*

The County will implement the strategies listed in the 2025 SWMPP and in the following table as part of their Public Education and Public Involvement Program during the 2025-2026 reporting period. The County will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.



6.1.3 *Assessment of Controls*

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Public Education and Public Involvement Control Measure as outlined in the 2021 permit. The strategies are adequate to educate the community about the impacts of storm water runoff, identify steps the community can take to help reduce pollutants, and provide opportunities for public involvement.

6.1.4 *Proposed Changes*

Etowah County requests no changes to the Public Education and Public Involvement strategies identified in the 2025 SWMPP.

6.1.5 *Responsible Parties*

The **Engineering Department** is responsible for overseeing, developing, and coordinating the Public Education and Public Involvement efforts. The Engineering Department is also responsible for providing content for the Storm Water Webpage and performing plat review regarding drainage and flood control.

Etowah County MS4

Table 6-1 Control Measure 1 - Public Education and Involvement

See Section 5.0 of the 2025 SWMPP

STRATEGY NO.	STRATEGIES	2024-2025 IMPLEMENTATION STATUS	2025-2026 PROPOSED EFFORTS	SUPPORTING DOCUMENTATION	COMMENTS	PROPOSED CHANGES
1	Maintain the Storm Water Webpage: Maintain the webpage and provide additional educational materials each reporting period.	The 2023-2024 Annual Report was added to the webpage. 15 views were recorded for the webpage between 8/14/24 and 3/31/25.	The County will maintain the webpage. The 2024-2025 Annual Report will be added to the website. Additional articles, pictures, and links to partner organization web pages and other information will be added as needed.	The Storm Water webpage and web site recorded hit information are attached. (See Documents 1-1 and 1-2)	Due to the change to GA4 Analytic as well as the entire Etowah County web site undergoing a full overhaul and upgrade, page views are only available after 8/14/2024 for all County web pages. https://etowahcounty.org/engineering/stormwater/	NO
2	Distribute Storm Water Educational Material on Litter Impacts: Partner with Keep Etowah Beautiful and/or Clean Water Partnership of Alabama to distribute storm water educational material on storm water impacts specifically related to litter, floatables, and debris. Maintain brochures in various County buildings.	The County partnered with Alabama People Against a Littered State (ALPALS), Keep Etowah Beautiful (KEB), the Alabama Cooperative Extension System (ACES) and the Natural Resources Conservation Service (NRCS) to distribute educational materials on litter impacts. Educational materials are available online, at the Engineering office and in the courthouse in the ACES office. Records are not kept of the number distributed.	The County will continue to partner with KEB and ALPALS to distribute storm water educational material on litter impacts. The County will increase public education on litter reduction.	A photo of educational materials at the engineering office and the ALPALS newsletter are attached. (See Documents 1-3 and 1-4)		NO
3	Distribute Storm Water Educational Material on Agricultural Best Practices: Partner with the US Department of Agriculture (USDA) and/or the Natural Resources Conservation Service (NRCS) to distribute storm water educational material on nutrient and pathogen pollution from crop and animal production. Maintain brochures in various County buildings.	The County partnered with the Alabama Cooperative Extension System (ACES) and the Natural Resources Conservation Service (NRCS) to distribute educational materials on agricultural BMPs. Educational materials are available online, at the Engineering office and in the courthouse in the ACES office. Records are not kept of the number distributed.	The County will continue to maintain hardcopy educational materials in the lobby of the Engineering Department. The County will continue to partner with and utilize the resources of the NRCS and ACES, as well as maintain the information available on the expanded Stormwater Webpage.	A photo of educational materials at the engineering office and the USDA Conservation at Work brochure are attached. (See Documents 1-3 and 1-5)		NO
4	Provide Information on Construction Site Storm Water Impacts: Provide information on how construction site runoff can impact storm water quality to developers and/or engineers requesting a preliminary design review for a subdivision plat.	No subdivisions were developed during the 2024-2025 reporting period. Materials are available both in person and online for developers	The County will continue to have information available to provide to developers and/or engineers. The County will continue to maintain construction runoff information on the Stormwater Webpage.	Construction stormwater educational materials are attached. (See Documents 1-6 and 1-7)		NO

Etowah County MS4

Table 6-1 Control Measure 1 - Public Education and Involvement

See Section 5.0 of the 2025 SWMPP

STRATEGY NO.	STRATEGIES	2024-2025 IMPLEMENTATION STATUS	2025-2026 PROPOSED EFFORTS	SUPPORTING DOCUMENTATION	COMMENTS	PROPOSED CHANGES
5	Provide Information on Low Impact/Green Development: Provide information on green development to individuals requesting plan review and building/development permits.	Educational materials are available online, at the Engineering office and in the courthouse in the ACES office. Records are not kept of the number distributed. A page specifically for green infrastructure was added to the County Stormwater webpage in 2023.	The County will continue to have this information available to provide to developers as well as maintain the information on the Stormwater webpage.	Low Impact Development and Green Infrastructure educational materials and the LID/GI webpage are attached. (See Documents 1-8 and 1-9)	https://etowahcounty.org/green-infrastructure/	NO
6	Annual Report and SWMPP Availability: Provide the SWMPP and the current Annual Report on the Storm Water Management webpage.	The 2023-2024 Annual Report and the 2025 SWMPP were added to the Storm Water webpage. 15 views were recorded for the webpage between 8/14/24 and 3/31/25.	The County will provide the current Annual Report and SWMPP for public viewing on the County's website.	The updated stormwater webpage with the 2025 SWPPP and 2023-2024 Annual Report is attached. (See Document 1-1)	https://etowahcounty.org/engineering/stormwater/	NO
7	Seek Public Input: Announce publication of the SWMPP and/or each year's Annual Report at the following County Commission Meeting. Encourage stakeholders to provide comments or questions regarding the implementation of the SWMPP.	The 2023-2024 Annual Report and the 2025 SWMPP were added to the Storm Water webpage. 0 comments received The availability of the Annual Report online was announced at the County Commission Meeting on June 11, 2024.	The County will continue to provide the Annual Report to the public by posting it on the County's website after each reporting period.	The updated stormwater webpage with the 2025 SWPPP and 2023-2024 Annual Report is attached. (See Document 1-1)	https://etowahcounty.org/engineering/stormwater/	NO
8	Gadsden-Etowah MS4 Steering Committee Meetings: Coordinate and/or participate in meetings of the Gadsden-Etowah Storm Water Steering Committee.	Robert Nail and Brian Rosenbalm attended the Storm Water Steering Committee meeting held on January 9, 2025 .	The County will continue to participate in meetings of the Gadsden-Etowah Storm Water Steering Committee.	The attendance record and an email with the meeting agenda are attached. (See Document 1-10)		NO
9	Alabama Stormwater Association Participation: County personnel will participate in meetings, seminars, or other events held by the Alabama Stormwater Association.	INCOMPLETE Etowah County did not attend any Alabama Stormwater Association events during the 2024-2025 fiscal year.	Etowah County Engineering Department personnel will continue to participate in programs offered by the Alabama Stormwater Association.			NO

Etowah County MS4

Table 6-1 Control Measure 1 - Public Education and Involvement

See Section 5.0 of the 2025 SWMPP

STRATEGY NO.	STRATEGIES	2024-2025 IMPLEMENTATION STATUS	2025-2026 PROPOSED EFFORTS	SUPPORTING DOCUMENTATION	COMMENTS	PROPOSED CHANGES
10	<p>Promote and participate in the Etowah County Water Festival: Promote and participate in the annual Etowah County Water Festival.</p>	<p>The 2025 Etowah County Water Festival was held February 24, 2025.</p> <p>The County promoted the water festival through the funding of Keep Etowah Beautiful and listing the event on the calendars of each elementary school available to all parents.</p> <p>3 County employees participated in 4 planning meetings.</p> <p>6 County employees volunteered at the Water Festival, as well as an unknown number of deputies from the Sheriff's Department.</p>	<p>The County will promote and participate in the 2026 Etowah County Water Festival.</p>	<p>Water festival planning agendas and a photo are from the event attached.</p> <p>(See Documents 1-11 and 1-12)</p>	<p>Water Festival: February 24, 2025 Adult Volunteers: 165 High School and College Presenters: 123 4th Grade Teachers: 66 4th Grade Students: 1157</p>	NO
11	<p>Public Reporting and Tracking System: Promote the methods for reporting non-compliant construction sites, illicit discharges, impaired waterways, and violations of ordinances related to storm water pollution. Evaluate the public reporting and tracking methods annually.</p>	<p>The County maintained an online complaint form on the stormwater webpage.</p> <p>0 complaints received via online form</p> <p>1 complaint received via phone</p> <p>3 complaints reported by County personnel</p> <p>4 complaints addressed</p> <p>3 complaints resolved</p> <p>4 complaints directed to ADEM</p> <p>The reporting program was evaluated and no changes were deemed necessary at this time.</p>	<p>The County will continue to publicize the reporting method on the County's website and track received complaints and the County's responses to the received complaints.</p> <p>The County will evaluate the current public reporting and tracking methods.</p>	<p>A screenshot of the online complaint form and the Online Stormwater Complaint Tracking Log are attached.</p> <p>(See Documents 1-13 and 1-14)</p>	<p>No complaints have been received via the online form since August 2023.</p> <p>https://etowahcounty.org/report-storm-water-issues/</p>	NO

Etowah County MS4

Table 6-1 Control Measure 1 - Public Education and Involvement

See Section 5.0 of the 2025 SWMPP

STRATEGY NO.	STRATEGIES	2024-2025 IMPLEMENTATION STATUS	2025-2026 PROPOSED EFFORTS	SUPPORTING DOCUMENTATION	COMMENTS	PROPOSED CHANGES
12	Promote and Participate in Anti-Litter/Cleanup Events: Partner with Keep Etowah Beautiful, Clean Water Partnership of Alabama, and/or Alabama Power to support, sponsor, and/or promote anti-litter and cleanup events. County personnel will participate in at least one event.	Etowah County provided support for Renew Our Rivers. Keep Etowah Beautiful also participated in the Great American Cleanup. 6 County employees volunteered in the events, as well as an unknown number of deputies from the Sheriff's Department.	The County will continue to partner with Keep Etowah Beautiful, Clean Water Partnership of Alabama, and/or Alabama Power to support, sponsor, and/or promote anti-litter and cleanup events.	Copies of emails, meetings and agendas, promotional posts/ material for events, and photos from the events are attached. A copy of the 2024-2025 Keep Etowah Beautiful Community Programs Summary is also attached. (See Documents 1-15, 1-16, 1-17, and 1-18)	Renew our Rivers: September 23 - September 27, 2024 729 Volunteers 5.58 tons of litter collected Great American Cleanup: April 1 - May 31, 2024 768 volunteers 11.56 tons of litter collected	NO
13	Adopt-A-Mile Program support: Maintain Adopt-a-Mile signs, provide trash bags to supporters, and dispose of collected litter.	0 miles adopted 0 streams adopted	Etowah County will continue to encourage the Adopt-A-Mile program and assist with individuals and/or groups with participation.	The ALPALS Adopt-A-Mile webpage, Adopt-a-Mile application, and Adopt-a-Stream webpage and application are attached. (See Documents 1-19, 1-20, and 1-21)	https://www.alpals.org/programs/alabama-adopt-a-mile-program/ https://www.alpals.org/programs/alabama-adopt-a-stream-program/	NO
14	Disposal Days: Provide quarterly free disposal days.	Disposal days were held on: - May 4, 2024 - August 3, 2024 - November 2, 2024 - February 1, 2025 Disposal days were promoted through public notices	The County will continue to support this effort in order to reduce illegal dumping of materials.	The disposal day public notices are attached. (See Document 1-22)		NO
15	No Dumping Signs: Maintain and add "No dumping" signs as necessary.	10 "No Dumping" signs were added	The County will continue to place or maintain these signs as needed in problem areas.	Photos of signs and the Illegal Dumpsite list are attached. (See Documents 1-23 and 1-24)	The County maintains "No Dumping \$500 fine" signs and some of these No Dumping areas are under video surveillance. These are put out in the County through Keep Etowah Beautiful as part of the effort to eliminate/reduce unauthorized disposal of waste.	NO
16	Program Evaluation: Utilize collected information to evaluate the effectiveness of the Public Education and Involvement Program.	The program was evaluated and no changes were currently deemed necessary.	The County will continue to assess Public Education and Involvement.			NO

Etowah County MS4

Table 6-1 Control Measure 1 - Public Education and Involvement

See Section 5.0 of the 2025 SWMPP

STRATEGY NO.	STRATEGIES	2024-2025 IMPLEMENTATION STATUS	2025-2026 PROPOSED EFFORTS	SUPPORTING DOCUMENTATION	COMMENTS	PROPOSED CHANGES
17	Additional Strategy: Partnerships in Educational and Public Involvement Events: The Great American Cleanup	April 1 - May 31, 2024 729 Volunteers 11.56 tons of trash collected Promoted by Etowah County's funding of Keep Etowah Beautiful.	The County will continue support of Keep Etowah Beautiful efforts and participation in the Great American Cleanup.	The Keep Etowah Beautiful Community Programs Summary and the Great American Cleanup Advertisement are attached. (See Documents 1-18 and 1-25)	Great American Cleanup: April 1 - May 31, 2024 768 volunteers 11.56 tons of litter collected	
18	Additional Strategy: Drug Collection Day	The County sponsored a Drug Collection Day at the Etowah County Courthouse on October 26, 2024 . The event was advertised on print media, social media, and County bulletin boards. The Etowah County Sheriff's Department also maintains a Drug Take Back box to allow drug drop off at any time.	Etowah County and the Sheriff's Department will continue the Drug Take Back programs.	Advertisements and Photos are attached. (See Document 1-26)		
19	Additional Strategy: Litter Ordinance	The Etowah County Sheriff Department enforced the litter ordinance. The number of citations is not available, because the office does not log litter violations separately from other investigations.	The Sheriff's office will continue to enforce the State littering code.	The Littering Code can be viewed at the following link: http://alisondb.legislature.state.al.us/alison/codeofalabama/1975/coatoc.htm Environmental/Agriculture Unit of the Etowah County Sheriff's Department link. https://www.etowahcountysheriff.com/environmental-slash-agriculture-unit		
20	Additional Strategy: Dead Animal Removal	The County removed dead animals from the roadside and offers equipment and manpower at cost for burial of large animals. No animals were removed this year.	The County will continue the Dead Animal program.			
21	Additional Strategy: Recycling Program - Manage a recycling program for aluminum cans, scrap metal, used oil and filters	12.3 tons of scrap metal, 412 gallons of used oil and 3 carts of used oil filters were collected at Etowah County's Gadsden shop.	Etowah County will continue to collect and recycle scrap metals and used oil.	Photos of collection areas, invoices, payments are attached. (See Documents 1-27, 1-28, and 1-29)	The County recycles aluminum cans in the break room at the maintenance shop. The County recycles metal from County projects and damaged street signs/posts.	
22	Additional Strategy: Clearing of drainage structures	The County cleared and removed trees and brush from drainage ways/rights-of-way as needed.	The County will continue clearing trees and brush from the right-of-way.	Report of hours and dates for brush removal is attached. (See Document 1-30)		

Etowah County MS4

Table 6-1 Control Measure 1 - Public Education and Involvement

See Section 5.0 of the 2025 SWMPP

STRATEGY NO.	STRATEGIES	2024-2025 IMPLEMENTATION STATUS	2025-2026 PROPOSED EFFORTS	SUPPORTING DOCUMENTATION	COMMENTS	PROPOSED CHANGES
23	Additional Strategy: Highway Erosion Control	Etowah County worked to reduce runoff within our right-of way and monitor areas for erosion. The County utilized riprap in areas resistant to permanent vegetation.	The County will continue the use of riprap for erosion control within the right-of-way.	Reports of hours and dates for erosion control is attached. (See Document 1-31)	The County will continue to use riprap and grassing as erosion countermeasures when applicable.	
24	Additional Strategy: Cardboard Recycling	The Etowah County Commission participates in the City of Gadsden's cardboard recycling by allowing a cardboard collection trailer to be placed at the Etowah County Courthouse for public use.	Etowah County will continue to participate in this program as long as it is available through the City of Gadsden.	Photos of the cardboard collection trailer at the Etowah County Courthouse are attached. (See Document 1-32)		
25	Additional Strategy: Water Quality Awareness Week	The week is promoted in conjunction with Renew our Rivers to encourage participation of more volunteers. The Etowah County Commission declared September 22-28, 2024 as <i>Water Quality Awareness Week</i> .	The County will promote the 2025 Water Quality Awareness Week.	The Commission resolution is attached. (See Document 1-33)		



6.2 Illicit Discharge Detection and Elimination

6.2.1 *Implementation Status*

During the April 1, 2024 to March 31, 2025 reporting period, Etowah County completed seventeen (17) of the seventeen (17) Illicit Discharge Detection and Elimination strategies identified in the previous Annual Report, the 2022 SWMPP, and the 2025 SWMPP.

A table identifying each Illicit Discharge Detection and Elimination strategy planned for the 2024-2025 reporting period, a description of actions taken by Etowah County, and a description of activities planned for the next reporting period is provided at the end of this section. Supporting documentation is included in **Appendix E**.

6.2.2 *Proposed Activities for the April 1, 2025 to March 31, 2026 Reporting Period*

The County will implement the strategies listed in the 2025 SWMPP and in the following table as part of their Illicit Discharge Detection and Elimination Program during the 2025-2026 reporting period. The County will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

6.2.3 *Assessment of Control*

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Illicit Discharge Detection and Elimination Control Measure as outlined in the 2021 permit. The strategies are adequate to prevent or correct illicit discharges to the Etowah County MS4.

6.2.4 *Proposed Changes*

Etowah County requests no changes to the Illicit Discharge Detection and Elimination strategies identified in the 2025 SWMPP.

6.2.5 *Responsible Party*

The **Engineering Department** is responsible for overseeing, developing, and coordinating the IDDE program in the Etowah County regulated MS4 area.

Etowah County MS4

Table 6-2 Control Measure 2 - Illicit Discharge Detection and Elimination

See Section 6.0 of the 2025 SWMPP

STRATEGY NO.	STRATEGIES	2024-2025 IMPLEMENTATION STATUS	2025-2026 PROPOSED EFFORTS	SUPPORTING DOCUMENTATION	COMMENTS	PROPOSED CHANGES
1	IDDE Regulatory Mechanism: Evaluate the possibility of developing an IDDE ordinance.	Etowah County currently does not have the authority to enact an illicit discharge ordinance, and would require action from the Alabama Legislature to gain that ability	The County will evaluate the potential for an Ordinance annually.		In Etowah County, Home Rule is limited by the 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 would require action from the Alabama Legislature to gain that authority.	NO
2	MS4 Map: Maintain and update the MS4 Map showing known outfalls from the Etowah County MS4.	0 civil plans provided to County 48 outfalls 0 verified new outfalls	The existing storm water system map will be updated as features are identified.	The updated Storm Water System Map and current outfall inventory are attached. (See Documents 2-1 and 2-2)	Outfalls ECO 16 and ECO 19 are now located within the Rainbow City limits. The County intends to remove the outfalls from the inventory during the 2025-2026 reporting period.	NO
3	Identify Priority Areas: Identify which drainage basins are considered Priority Areas for each reporting period.	2 Priority Areas were identified, Whorton Bend and Tillison Bend	The County will continue to evaluate the development of areas within the MS4.	Maps of the priority areas are attached. (See Document 2-3)	The County designates Priority Areas within the Etowah County MS4 based on population density.	NO
4	Outfall Reconnaissance Inventory for New MS4 Areas: Implement a stream-walking program designed to identify outfalls to the MS4 within the newly-added MS4 areas if Urbanized Area Boundary changes.	No new areas were added to the Etowah County MS4 during the reporting period.	Should the MS4 boundary change, the County will implement a stream-walking program designed to identify outfalls to the MS4 within the newly-added MS4 areas.		Updated urban area boundaries were provided by the Census Bureau, but ADEM has not issued revised MS4 boundaries.	NO
5	Outfall Reconnaissance Inventory for Previously Unidentified Outfalls: Identify, inspect, and screen previously unknown outfalls at time of discovery. Add the outfalls to the MS4 outfall inventory and map.	0 new outfalls identified 0 outfalls removed	Previously unknown outfalls encountered during dry-weather inspections of known outfalls will be identified, inspected, and screened at the time of discovery. Outfalls encountered during other field observations will be reported to the Engineering Department to be added to the outfall database for verification and inspection.	The updated Storm Water System Map and current outfall inventory are attached. (See Documents 2-1 and 2-2)	Outfalls ECO 16 and ECO 19 are now located within the Rainbow City limits. The County intends to remove the outfalls from the inventory during the 2025-2026 reporting period.	NO

Etowah County MS4

Table 6-2 Control Measure 2 - Illicit Discharge Detection and Elimination

See Section 6.0 of the 2025 SWMPP

STRATEGY NO.	STRATEGIES	2024-2025 IMPLEMENTATION STATUS	2025-2026 PROPOSED EFFORTS	SUPPORTING DOCUMENTATION	COMMENTS	PROPOSED CHANGES
6	Verification of Potential Outfalls Identified During Final Plat Approval: Verify outfalls identified prior to acceptance of the major subdivision infrastructure for County maintenance.	0 new outfalls identified	Outfalls identified during review of the as-built drawings or from the final inspection will be added to the outfall inventory and map as "Potential Outfalls" and will be inspected during the scheduled ORI activities.			NO
7	Outfall Reconnaissance Inventory (ORI) During Dry Weather: Conduct dry weather ORI inspections on a minimum of 15% of known outfalls during each reporting period. Inspect priority outfalls once every 3 years.	0 priority outfalls inspected 16 non-priority outfalls inspected 33% of total outfalls	The County will continue to inspect a minimum of 15% of all known outfalls during each reporting period. Outfalls in Priority Areas will be inspected once every 3 years.	The 2024-2025 Inspection Log and an inspection field sheets are attached. (See Documents 2-4 and 2-5)		NO
8	Suspect Discharge Screening: Screen dry-weather flows that are observed at an outfall during inspection.	16 outfalls were inspected 12 dry weather flows observed 0 suspect discharges determined	The County will continue to screen dry-weather flows observed during outfall inspections as detailed in Section 8.9 of the IDDE Program.	The 2024-2025 Inspection Log and an inspection field sheets are attached. (See Documents 2-4 and 2-5)		NO
9	Suspect Discharge Sampling: Sample dry weather flows that have a severity index of 3 on one or more indicators in Section 4 of the ORI Field Sheet.	12 dry weather flows 0 suspect discharges determined 0 samples collected 0 confirmed illicit discharges	The County will collect samples of suspect discharges for further analysis as detailed in Section 8.10 of the IDDE Program.	The 2024-2025 Inspection Log and an inspection field sheets are attached. (See Documents 2-4 and 2-5)		NO
10	Outfall Ranking: Analyze data from the outfall inspections to designate outfalls as having obvious, suspect, possible, or unlikely discharge potential.	0 obvious illicit discharges 0 suspect illicit discharges	The County will continue to analyze data from each ORI Field Sheet to designate the observed outfall as having obvious, suspect, possible, or unlikely discharge potential.	The 2024-2025 Inspection Log and an inspection field sheets are attached. (See Documents 2-4 and 2-5)		NO
11	Illicit Discharge Investigation: Perform illicit discharge investigations to determine the source of a discharge problem and the responsible party.	1 illicit discharge investigation 0 illicit discharges confirmed 0 illicit discharges eliminated	Where illicit discharges are identified, the County will conduct an illicit discharge investigation to determine the source.	The Illicit Discharge Case Log is attached. (See Document 2-6)		NO

Etowah County MS4

Table 6-2 Control Measure 2 - Illicit Discharge Detection and Elimination

See Section 6.0 of the 2025 SWMPP

STRATEGY NO.	STRATEGIES	2024-2025 IMPLEMENTATION STATUS	2025-2026 PROPOSED EFFORTS	SUPPORTING DOCUMENTATION	COMMENTS	PROPOSED CHANGES
12	Corrective Action Record Keeping: Create a case log detailing pertinent information when a suspect illicit discharge or illicit connection is identified.	0 illicit discharges confirmed 0 illicit discharges eliminated 0 illicit discharge corrective action pending	When a suspect illicit discharge or illicit connection is identified, a case log will be created to track information related to the incident or report.	The Illicit Discharge Case Log is attached. (See Document 2-6)		NO
13	Illicit Discharge Elimination: Report identified illicit discharges to the appropriate County department or agency for corrective action.	4 complaints received 4 complaints addressed 3 complaints resolved 4 complaints directed to ADEM	Identified illicit discharges will be reported to the appropriate department or agency for corrective action.	The Online Stormwater Complaint Tracking Log and copies of the ADEM complaint reports are attached. (See Documents 1-14, 2-7, 2-8, 2-9, and 2-10)	April 15, 2024 - Trash from the landfill April 25, 2024 - Dam across creek with unpermitted land disturbance July 31, 2024 - Scrap tire piles February 17, 2025 - Unpermitted construction site	NO
14	Public Reporting and Tracking System: Promote the reporting number and form for reporting non-compliant construction sites, illicit discharges, impaired waterways, and violations of ordinances related to storm water pollution. Evaluate the efficacy of the program.	The County maintained an online complaint form on the stormwater webpage. 0 complaints received via online form 1 complaint received via phone 3 complaints reported by County personnel 4 complaints addressed 3 complaints resolved 4 complaints directed to ADEM The reporting program was evaluated and no changes were deemed necessary at this time.	The County will continue to publicize the reporting method on the County's website and track received complaints and the County's responses to the received complaints. The County will evaluate the current public reporting and tracking methods.	A screenshot of the online complaint form and the Online Stormwater Complaint Tracking Log are attached. (See Documents 1-13 and 1-14)	No complaints have been received via the online form since August 2023. https://etowahcounty.org/report-storm-water-issues/	NO
15	Annual County Employee Training: Train County employees in the identification of illicit discharges annually.	S&ME addressed illicit discharge identification and reporting in the Annual Training conducted on March 18, 2025 . 29 County employees attended the training.	The County will train personnel on the identification of illicit discharges and procedures for reporting illicit discharges within the County organization.	Attendance records and training materials are attached. (See Documents 2-11 and 2-12)		NO

Etowah County MS4

Table 6-2 Control Measure 2 - Illicit Discharge Detection and Elimination

See Section 6.0 of the 2025 SWMPP

STRATEGY NO.	STRATEGIES	2024-2025 IMPLEMENTATION STATUS	2025-2026 PROPOSED EFFORTS	SUPPORTING DOCUMENTATION	COMMENTS	PROPOSED CHANGES
16	Notify ADEM of Illicit Discharges from an Adjacent MS4: Notify the appropriate MS4 and the ADEM Water Division within <u>48 hours</u> of observation of a suspect illicit discharge from an adjacent MS4.	0 suspect illicit discharges reported to other agencies	The County will continue to notify the ADEM Water Division of observation of any suspect discharge from an adjacent MS4.		No illicit discharges from adjacent MS4 permit areas were observed or reported.	NO
17	Notify ADEM of Unpermitted Industrial Sites: Report unpermitted facilities that require an NPDES permit to the Industrial Section of ADEM.	0 unpermitted industrial facilities were reported to the ADEM during the reporting period	Unpermitted facilities will be reported to the Industrial Permits Section of ADEM.		Etowah County continues to rely on ADEM for NPDES permitting enforcement.	NO



6.3 Construction Site Storm Water Runoff

6.3.1 *Implementation Status*

During the April 1, 2024 to March 31, 2025 reporting period, Etowah County completed eleven (11) of the eleven (11) Construction Site Storm Water Runoff strategies identified in the previous Annual Report, the 2022 SWMPP, and the 2025 SWMPP.

A table identifying each Construction Site Storm Water Runoff strategy planned for the 2024-2025 reporting period, a description of actions taken by Etowah County, and a description of activities planned for the next reporting period is provided at the end of this section. Supporting documentation is included in **Appendix F**.

6.3.2 *Proposed Activities for the April 1, 2025 to March 31, 2026 Reporting Period*

The County will implement the strategies listed in the 2025 SWMPP and in the following table as part of their Construction Site Storm Water Runoff Control Measure during the 2025-2026 reporting period. The County will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

6.3.3 *Assessment of Controls*

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Construction Site Storm Water Runoff Control Measure as outlined in the 2021 permit. The strategies are adequate to monitor and control pollutants associated with land disturbing activities.

6.3.4 *Proposed Changes*

Etowah County requests no changes to the Construction Site Storm Water Runoff strategies identified in the 2025 SWMPP.

6.3.5 *Responsible Party*

The **Engineering Department** is responsible for implementing the Construction Site Storm Water Runoff Control Program.

Etowah County MS4

Table 6-3 Control Measure 3 - Construction Site Storm Water Runoff

See Section 7.0 of the 2025 SWMPP

STRATEGY NO.	STRATEGIES	2024-2025 IMPLEMENTATION STATUS	2025-2026 PROPOSED EFFORTS	SUPPORTING DOCUMENTATION	COMMENTS	PROPOSED CHANGES
1	Erosion and Sediment Control Regulations: County's Subdivision Regulations, Article V, Section 5-4-4 (Road Construction Requirements) regulates storm water management within the County Evaluate the effectiveness of the Regulations each reporting period.	The County evaluated the Ordinance on its effectiveness in addressing erosion and sediment control and no changes were deemed necessary at this time.	The County will evaluate the Subdivision Regulations annually.	The County's Subdivision Regulations can be viewed at the link below: http://etowahcounty.org/departments/engineering/		NO
2	BMP Training Program: Maintain QCI certification for County employees tasked with conducting BMP inspections.	1 received QCI training William Vaughn QCI T7888	County personnel tasked with conducting BMP inspections will be certified under an ADEM-approved QCI training program and will attend annual refreshers.	William Vaughn's QCI certificate is attached. (See Document 3-1)		NO
3	Require Plat Submittal: Require submission of a Proposed Plat Application Assembly to the County Engineer for major subdivisions.	0 plats were reviewed	The County will continue to require submission of a Proposed Plat Application Assembly for review prior to approval by the County Commission.		No Proposed Plat Application Assemblies were submitted.	NO
4	Sediment and Erosion Control Plan Review Procedures: Sediment and erosion control measures certified by a Qualified Credentialed Professional will be deemed adequate.	0 plats were approved	The County will not review submitted plats for erosion and sediment control measures and will instead rely on the designated Qualified Credentialed Professionals preparing the Construction Best Management Practices Plans.		No Proposed Plat Application Assemblies were submitted.	NO
5	Maintain Inventory of Qualifying Construction Sites: Maintain a list of active qualifying construction sites within the MS4 boundary.	0 active qualifying construction sites	The County will continue to maintain a list of active qualifying construction sites within the MS4 boundary.	A blank construction site inventory is attached. (See Document 3-2)		NO

Etowah County MS4

Table 6-3 Control Measure 3 - Construction Site Storm Water Runoff

See Section 7.0 of the 2025 SWMPP

STRATEGY NO.	STRATEGIES	2024-2025 IMPLEMENTATION STATUS	2025-2026 PROPOSED EFFORTS	SUPPORTING DOCUMENTATION	COMMENTS	PROPOSED CHANGES
6	Inspection of Qualifying Non-Priority Sites: Inspect qualifying construction sites using the BMP Inspection Form <u>every three months</u> until permit termination.	0 inspections completed 0 non-compliant construction site 0 enforcement actions 0 non-compliant sites reported to ADEM 0 repeat offenders	The County will continue to inspect qualifying construction sites.	The blank inspection form is attached. (See Document 3-3)	The County does not currently have authority over construction activities beyond the initial infrastructure, nor does the County have the authority to regulate private developments such as commercial sites, individual home sites, or private subdivisions.	NO
7	Inspection of Priority Construction Sites: If a site is a Priority Site inspect the site <u>once a month</u> using the BMP Inspection Form until permit termination.	0 priority construction sites located within the MS4	Should a Priority watershed be designated, the City will identify and inspect qualifying Priority construction sites once per month.		The Etowah County MS4 does not currently incorporate any waterbodies or watersheds that are impaired for siltation or turbidity.	NO
8	Re-inspection of Sites: Re-inspect sites where deficiencies are noted and cannot be corrected during inspection. Use the BMP Inspection Form to complete re-inspections.	0 re-inspections completed 0 non-compliant construction site 0 enforcement actions 0 non-compliant sites reported to ADEM 0 repeat offenders	The County will continue to re-inspect sites with noted deficiencies.	The blank inspection form is attached. (See Document 3-3)		NO
9	Public Reporting and Tracking System: Promote the reporting number and form for reporting non-compliant construction sites, illicit discharges, impaired waterways, and violations of ordinances related to storm water pollution. Evaluate the efficacy of the program.	The County maintained an online complaint form on the stormwater webpage. 0 complaints received via online form 1 complaint received via phone 3 complaints reported by County personnel 4 complaints addressed 3 complaints resolved 4 complaints directed to ADEM The reporting program was evaluated and no changes were deemed necessary at this time.	The County will continue to publicize the reporting method on the County's website and track received complaints and the County's responses to the received complaints. The County will evaluate the current public reporting and tracking methods.	A screenshot of the online complaint form and the Online Stormwater Complaint Tracking Log are attached. (See Documents 1-13 and 1-14)	No complaints have been received via the online form since August 2023. https://etowahcounty.org/report-storm-water-issues/	NO

Etowah County MS4

Table 6-3 Control Measure 3 - Construction Site Storm Water Runoff

See Section 7.0 of the 2025 SWMPP

STRATEGY NO.	STRATEGIES	2024-2025 IMPLEMENTATION STATUS	2025-2026 PROPOSED EFFORTS	SUPPORTING DOCUMENTATION	COMMENTS	PROPOSED CHANGES
10	Notify ADEM of Unpermitted Sites: Notify ADEM of any construction site that is not permitted under the Alabama Construction General Permit.	2 unpermitted construction sites reported to ADEM	The County will notify ADEM of any qualifying construction site that is not permitted under the Alabama Construction General Permit.	Copies of the ADEM complaint reports are attached. (See Documents 2-8 and 2-10)	April 25, 2024 - Dam across creek with unpermitted land disturbance February 17, 2025 - Unpermitted construction site	NO
11	Notify ADEM of Non-Compliant Sites: Notify ADEM of non-compliant construction sites.	2 non-compliant construction sites reported to ADEM	The County will continue to notify ADEM of non-compliant compliant sites.	Copies of the ADEM complaint reports are attached. (See Documents 2-8 and 2-10)	April 25, 2024 - Dam across creek with unpermitted land disturbance February 17, 2025 - Unpermitted construction site	NO



6.4 Post-Construction Storm Water Management in New Development and Redevelopment

6.4.1 *Implementation Status*

During the April 1, 2024 to March 31, 2025 reporting period, Etowah County completed twelve (12) of the twelve (12) Post-Construction Storm Water Management strategies identified in the previous Annual Report, the 2022 SWMPP, and the 2025 SWMPP.

The County completed two (2) additional strategies:

- The County collected used oil and filters for recycling (Strategy 16).
- The County performed daily inspections on fleet vehicles and corrected identified maintenance issues (Strategy 17).

A table identifying each Post-Construction Storm Water Management strategy planned for the 2024-2025 reporting period, a description of actions taken by Etowah County, and a description of activities planned for the next reporting period is provided at the end of this section. Supporting documentation is included in **Appendix G**.

6.4.2 *Proposed Activities for the April 1, 2025 to March 31, 2026 Reporting Period*

The County will implement the strategies listed in the 2025 SWMPP and in the following table as part of their Post-construction Storm Water Management Control Measure during the 2025-2026 reporting period. The County will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

6.4.3 *Assessment of Control*

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Post-construction Storm Water Management Control Measure as outlined in the 2021 permit. The strategies are adequate to address post-construction storm water runoff from new development and re-development.

6.4.4 *Proposed Changes*

Etowah County requests no changes to the Pollution Prevention and Good Housekeeping for Municipal Operations strategies identified in the 2025 SWMPP.

6.4.5 *Responsible Party*

The **Engineering Department** is responsible for establishing design criteria for subdivision storm drainage systems, evaluating the Subdivision Regulations, reviewing submitted subdivision plats, and performing inspections of County-owned post-construction BMPs.

Etowah County MS4

Table 6-4 Control Measure 4 - Post-Construction Storm Water Management

See Section 8.0 of the 2025 SWMPP

STRATEGY NO.	STRATEGIES	2024-2025 IMPLEMENTATION STATUS	2025-2026 PROPOSED EFFORTS	SUPPORTING DOCUMENTATION	COMMENTS	PROPOSED CHANGES
1	Post-Construction Storm water Management Ordinance: County's Subdivision Regulations, Article V, Section 5-4-4 (Road Construction Requirements) regulates post-construction storm water management within the County. Evaluate the effectiveness of the Regulations each reporting period	The County evaluated the Subdivision Regulations on their effectiveness in reducing runoff from new development or redevelopment and <i>(what, if any)</i> changes were deemed necessary.	The County will evaluate the Subdivision Regulations annually.	The County's Subdivision Regulations can be viewed at the link below: https://etowahcounty.org/departments/engineering/	https://etowahcounty.org/wp-content/uploads/sites/2/2016/02/etowah_county_subdivision_regulations.pdf	NO
2	Encourage Low-Impact Development/Green Infrastructure Practices: Provide information on green development to individuals requesting plan review and building/development permits.	0 plat reviews requested	The County will continue to provide information on green development to individuals requesting plan review.	Low Impact Development and Green Infrastructure educational materials and the LID/GI webpage are attached. (See Documents 1-8 and 1-9)	No Proposed Plat Application Assemblies were submitted.	NO
3	Require Plat Submittal: Require submission of a Proposed Plat Application Assembly to the County Engineer for major subdivisions.	0 plats were reviewed	The County will continue to require submission of a Proposed Plat Application Assembly for major subdivisions.		No Proposed Plat Application Assemblies were submitted.	NO
4	Plan Review Procedures: Review Proposed Plat Application Assemblies for major subdivisions within 30 days of submittal.	0 plats were reviewed No additional metrics were deemed necessary	The County will continue to review any submitted Proposed Plat Application Assemblies.		No Proposed Plat Application Assemblies were submitted.	NO
5	Require As-Built Certification: Require as-built plans following completion of infrastructure construction for a major subdivision or following approval of the proposed plat for a minor subdivision or large acreage tract.	0 as-built plans were provided	The County will continue to require as-built plans following completion of infrastructure construction for a major subdivision or following approval of the proposed plat for a minor subdivision or large acreage tract.			NO
6	Post-Installation Inspections: Poorly-functioning post-construction controls that result in illicit discharges will be reported to ADEM.	0 illicit discharges reported to ADEM	The County will report illicit discharges from poorly-functioning privately-owned post-construction controls to ADEM.		The County does not currently have authority to inspect post-construction controls located on private property.	NO

Etowah County MS4

Table 6-4 Control Measure 4 - Post-Construction Storm Water Management

See Section 8.0 of the 2025 SWMPP

STRATEGY NO.	STRATEGIES	2024-2025 IMPLEMENTATION STATUS	2025-2026 PROPOSED EFFORTS	SUPPORTING DOCUMENTATION	COMMENTS	PROPOSED CHANGES
7	Require long-term maintenance on storm water controls: Post-construction controls must be located on private property and the parcel of land must be retained by the developer of HOA.	0 subdivision plats were reviewed	The County will continue to require that the developer or HOA be responsible for long-term maintenance on private storm water controls.			NO
8	Inventory of Post-Construction Structural Controls: Compile an inventory of post-construction structural controls located within the Etowah County MS4. Update the inventory annually.	0 new structural BMPs added 0 total structural BMPs	The County will continue to maintain an inventory of post-construction structural controls within the Etowah County MS4.			NO
9	Annual Inspection of County-owned Post-Construction Storm Water Controls: Inspect post-construction BMPs within the MS4 a minimum of once per year.	0 post-construction County-owned storm water controls 0 inspections performed	The County will inspect County-owned or managed post-construction BMPs within the Etowah County MS4 at a minimum of once per year.	The blank Post-Construction BMP Inspection Form is attached. (See Document 4-1)		NO
10	Annual Inspection of Privately-owned Post-Construction Storm Water Controls: Poorly-functioning post-construction controls that result in illicit discharges will be reported to ADEM.	0 illicit discharges reported to ADEM	The County will report illicit discharges from poorly-functioning privately-owned post-construction controls to ADEM.		The County does not currently have authority to inspect post-construction controls located on private property.	NO
11	Corrective Actions for County-Owned Post-Construction Controls: Perform maintenance or repairs if an inspection identifies a maintenance issue.	0 post-construction County-owned storm water controls 0 corrective actions taken	The County will perform necessary maintenance or repairs for county-owned post-construction controls with identified maintenance issues.	The blank Post-Construction BMP Inspection Form is attached. (See Document 4-1)		NO
12	Procedures to Address Non-Compliant Post-Construction BMPs: Poorly-functioning post-construction controls that result in illicit discharges will be reported to ADEM.	0 illicit discharges reported to ADEM	The County will report illicit discharges from poorly-functioning privately-owned post-construction controls to ADEM.		The County does not currently have authority to inspect post-construction controls located on private property.	NO



6.5 Pollution Prevention and Good Housekeeping for County Operations

6.5.1 *Implementation Status*

During the April 1, 2024 to March 31, 2025 reporting period, Etowah County completed fifteen (15) of the fifteen (15) Pollution Prevention and Good Housekeeping for County Operations strategies identified in the previous Annual Report, the 2022 SWMPP, and the 2025 SWMPP.

Etowah County also completed two (2) strategies beyond those proposed in the previous Annual Report, the 2022 SWMPP, and the 2025 SWMPP. These strategies include:

- Providing oil waste recycling for county vehicles and equipment (Strategy 16)
- Providing a vehicle maintenance program for routine inspections of municipal vehicles and equipment (Strategy 17)

A table identifying each Pollution Prevention and Good Housekeeping for County Operations strategy planned for the 2024-2025 reporting period, a description of actions taken by Etowah County, and a description of activities planned for the next reporting period is provided at the end of this section. Supporting documentation is included in **Appendix H**.

6.5.2 *Proposed Activities for the April 1, 2025 to March 31, 2026 Reporting Period*

The County will implement the activities listed in the 2025 SWMPP and in the following table as part of their Pollution Prevention and Good Housekeeping for Municipal Operations Control Measure during the 2025-2026 reporting period. The County will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

6.5.3 *Assessment of Control*

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Pollution Prevention and Good Housekeeping for County Operations Control Measure as outlined in the 2021 permit. The strategies are adequate to address storm water pollution prevention from County operations.

6.5.4 *Proposed Changes*

Etowah County requests no changes to the Pollution Prevention and Good Housekeeping for County Operations strategies identified in the 2025 SWMPP.

6.5.5 *Responsible Party*

The **Engineering Department** will be responsible for conducting the County facility evaluations and maintaining records of the facility inspections. The Engineering Department is also responsible for coordinating the annual reviews of the SOPs, performing roadway maintenance, and coordinating litter reduction efforts.

Etowah County MS4

Table 6-5 Control Measure 5 - Pollution Prevention and Good Housekeeping for Municipal Operations

See Section 9.0 of the 2025 SWMPP

STRATEGY NO.	STRATEGIES	2024-2025 IMPLEMENTATION STATUS	2025-2026 PROPOSED EFFORTS	SUPPORTING DOCUMENTATION	COMMENTS	PROPOSED CHANGES
1	County Facilities Inventory: Maintain an inventory of all county facilities, including facilities that have the potential to discharge pollutants. Update the inventory annually.	3 County facilities total 1 County facility with pollution potential	The County will continue to maintain the inventory listing all County facilities, including County facilities that have the potential to discharge pollutants via storm water runoff.	An updated inventory of County facilities is attached. (See Document 5-1)		NO
2	Promote and Participate in Anti-Litter/Cleanup Events: Partner with Keep Etowah Beautiful, Clean Water Partnership of Alabama, and/or Alabama Power to support, sponsor, and/or promote anti-litter and cleanup events.	Etowah County provided support for Renew Our Rivers and the Water Festival. Keep Etowah Beautiful also participated in the Great American Cleanup. 6 County employees volunteered at the Water Festival as well as an unknown number of deputies from the Sheriff's Department.	The County will continue to partner with Keep Etowah Beautiful, Clean Water Partnership of Alabama, and/or Alabama Power to support, sponsor, and/or promote anti-litter and cleanup events.	Copies of emails, meetings and agendas, promotional posts/ material for events, and photos from the events are attached. A copy of the 2024-2025 Keep Etowah Beautiful Community Programs Summary is also attached. (See Documents 1-15, 1-16, 1-17, and 1-18)	Renew our Rivers: September 23 - September 27, 2024 729 Volunteers 5.58 tons of litter collected Great American Cleanup: April 1 - May 31, 2024 768 volunteers 11.56 tons of litter collected	NO
3	Adopt-A-Mile Program support: Maintain Adopt-a-Mile signs and provide trash bags to supporters.	0 miles adopted 0 streams adopted	Etowah County will continue to encourage the Adopt-A-Mile program and assist with individuals and/or groups with participation.	The ALPALS Adopt-A-Mile webpage, Adopt-a-Mile application, and Adopt-a-Stream webpage and application are attached. (See Documents 1-19, 1-20, and 1-21)	https://www.alpals.org/programs/alabama-adopt-a-mile-program/ https://www.alpals.org/programs/alabama-adopt-a-stream-program/	NO
4	Disposal Days: Provide quarterly free disposal days.	Disposal days were held on: - May 4, 2024 - August 3, 2024 - November 2, 2024 - February 1, 2025 Disposal days were promoted through public notices	The County will continue to support this effort in order to reduce illegal dumping of materials.	Disposal day public notices are attached. (See Document 1-22)		NO
5	No Dumping Signs: Maintain and add "No Dumping" signs as necessary.	10 "No Dumping" signs were signs added.	The County will continue to place or maintain these signs in problem areas.	Photos of signs and the Illegal Dumpsite list are attached. (See Documents 1-23 and 1-24)	The County maintains "No Dumping \$500 fine" signs and some of these No Dumping areas are under video surveillance. These are put out in the County through Keep Etowah Beautiful as part of the effort to eliminate/reduce unauthorized disposal of waste.	NO

Etowah County MS4

Table 6-5 Control Measure 5 - Pollution Prevention and Good Housekeeping for Municipal Operations

See Section 9.0 of the 2025 SWMPP

STRATEGY NO.	STRATEGIES	2024-2025 IMPLEMENTATION STATUS	2025-2026 PROPOSED EFFORTS	SUPPORTING DOCUMENTATION	COMMENTS	PROPOSED CHANGES
6	Scrap Tire Collection: Collected tires from other activities will be disposed of properly.	The County disposed of 2 tires collected during the Renew Our Rivers Cleanup.	The County will continue to manage scrap tires collected by County litter crews from public right of ways, as well as tires collected during Renew Our Rivers cleanups.	The Renew Our Rivers summary from Keep Etowah Beautiful is attached. (See Document 1-18)	The Scrap Tire Program has been very successful and fewer tires are being found than in past years.	NO
7	Inmate Cleanup Crews: Inmate crews will be used to remove litter among roadways when possible.	The Influx Program utilizes inmate cleanup crews to collect litter along County roads. Days - 146 Miles - 684.91 Tons - 41.28 Recyclable Litter - 18.95 tons	The Etowah County Sheriff's Department will continue this program.	The Etowah County Sheriff's Office Influx Programs Summary is attached. (See Document 5-2)		NO
8	Evaluate Effectiveness of Litter Reduction Program: Evaluate the litter reduction program.	The County has evaluated the program and identified that no changes are necessary at this moment but is exploring avenues of increasing visibility. The free disposal program has had an overwhelming response. The Commission has provided additional dumpsters and a compactor to handle all of the trash that it brought in each quarter.	The County will track the metrics identified in the 2025 SWMPP and evaluate the effectiveness of the program each reporting period. If low public participation in the Adopt-a-Mile or free disposal programs is observed, the County will evaluate increasing advertisements for the programs or changing advertising methods.		It is increasingly more difficult to reach the public. There is a lack of local media in our area and reporters very rarely attend Commission meeting. Information relating to events is sometimes promoted on social media by from organizations and individuals, but often only seen by others on that platform.	NO
9	Vehicle and Equipment Maintenance SOP: Evaluate the SOP for vehicle and equipment maintenance by March 31 each year.	The County has evaluated the SOP for and determined no changes are needed at this time.	The County will evaluate the Vehicle and Equipment Maintenance SOP by March 31, 2026.	A copy of the Fleet Maintenance Summary and the SOP Checklist are attached. (See Documents 5-3 and 5-4)		NO
10	Equipment and Vehicle Washing SOP: Evaluate the SOP by March 31 each year.	1 designated wash area maintained The County evaluated the SOP and determined no changes are needed at this time.	The County will evaluate the Equipment and Vehicle Washing SOP by March 31, 2026.	The county facility inventory, quarterly inspection/SOP checklists and wash area photos are attached. (See Documents 5-1, 5-4, and 5-5)		NO
11	County Vehicle Fueling SOP: Develop a county vehicle fueling SOP by March 31, 2024. Evaluate the SOP by March 31 each year.	The County evaluated the Fueling SOP and determined no changes are needed at this time.	The County will evaluate the Vehicle Fueling SOP by March 31, 2026.	A copy of the Fleet Fueling SOP is attached. (See Document 5-6)		NO

Etowah County MS4

Table 6-5 Control Measure 5 - Pollution Prevention and Good Housekeeping for Municipal Operations

See Section 9.0 of the 2025 SWMPP

STRATEGY NO.	STRATEGIES	2024-2025 IMPLEMENTATION STATUS	2025-2026 PROPOSED EFFORTS	SUPPORTING DOCUMENTATION	COMMENTS	PROPOSED CHANGES
12	Herbicide SOP: Evaluate the SOP by March 31 each year.	The Assistant County Engineer, Brian Rosenbalm, obtained his herbicide certification in 2025. This will provide a person of authority that can oversee and improve the herbicide program. The County has evaluated the Herbicide SOP and determined no changes are needed at this time	The County will evaluate the herbicide SOP by March 31, 2026. Should other pesticide applications be needed, the County will review applicator certifications and licensing during the bid process.	Herbicide SOP, reports and copies of herbicide certifications are attached. (See Document 5-7)		NO
13	Quarterly Inspection of County Facilities: Inspect county facilities that have the potential to discharge pollutants <u>once per quarter</u> .	1 facility with potential to discharge 4 inspections performed 0 deficiencies noted	County facilities with potential to discharge pollutants will be inspected for good housekeeping practices once per quarter.	The county facility inventory and quarterly inspection/SOP checklists are attached. (See Documents 5-1 and 5-4)		NO
14	Corrective Actions at County Facilities: Address noted deficiencies from quarterly inspections within <u>72 hours</u> of the inspection.	0 deficiencies noted 0 deficiencies corrected 0 deficiencies re-inspected	The County will address deficiencies from quarterly inspections within 72 hours of the inspection.	The county facility inventory and quarterly inspection/SOP checklists are attached. (See Documents 5-1 and 5-4)		NO
15	Annual Employee Training: Conduct annual training for County personnel.	S&ME addressed illicit discharge identification and reporting in the Annual Training conducted on March 18, 2025 . 29 County employees attended the training.	The County will train personnel on the identification of illicit discharges and procedures for reporting illicit discharges within the County organization.	Attendance records and training materials are attached. (See Documents 2-11 and 2-12)		NO
16	Additional Strategy: Oil Waste Recycling - The Etowah County Shop collects used oil and filters from County vehicles and equipment.	412 gallons of oil were recycled. 3 carts of oil filters were recycled.	Etowah County will continue to collect and recycle waste oil and filters.	Photos of collection areas, invoices, payments are attached. (See Documents 1-27, 1-28, and 1-29)	The County collects used oil and filters at the Maintenance Shop. The used oil filters collected during the 2023-2024 reporting period were collected on 4-26-2024.	
17	Additional Strategy: Vehicle Maintenance Program: Conduct routine inspections of municipal vehicles and equipment.	Daily inspections were performed on vehicles before they were driven. 4 vehicle or equipment leaks identified and corrected during the reporting period	The County will conduct routine inspections of municipal vehicles and equipment.	A copy of the Fleet Maintenance Summary and the SOP Checklist are attached. (See Documents 5-3 and 5-4)		



7.0 Notice of Reliance

Reference Part VI.B.6

7.1 Steering Committee

The Gadsden-Etowah Steering Committee was first established in 2011 following re-issuance of the joint permit. The intent of the steering committee was to provide for coordination between the co-permittees. When the joint permit was superseded by the separate permits in 2016, the committee continued to work together to produce and implement a joint SWMPP and monitoring program.

The Steering Committee will continue under the 2021 permit, although each entity currently operates under individual SWMPPs and the City of Gadsden has discontinued their participation in the joint monitoring program. The cities of Attalla, Glencoe, Hokes Bluff, Rainbow City, and Southside and Etowah County remain committed to partnership and joint implementation of the monitoring program.

Each of the seven entities provide at least one member to the Gadsden-Etowah Storm Water Steering Committee. Each entity is responsible for providing the required annual updates and monitoring data to the Steering Committee.

Table 7-1 Gadsden-Etowah Storm Water Steering Committee

Entity	Contact	Phone Number	Email
City of Attalla	Jason Nicholson	256-441-9200	jnicholson@attallacity.org
City of Gadsden	Heath Williamson	256-549-4520	hwilliamson@cityofgadsden.com
City of Gadsden	Keener Morrow	256-549-4524	kmorrow@cityofgadsden.com
City of Glencoe	Todd Means	256-492-1424	toddmeans@cityofglencoe.org
City of Hokes Bluff	Lisa Lowman	256-492-2414	lisa.lowman@cityofhokesbluff.com
City of Rainbow City	Joel Garmon	256-413-1230	jgarmon@rbcalabama.com
City of Southside	Judd Rich	256-442-9775 Ext. 103	juddrich@cityofsouthside.com
Etowah County	Robert Nail	256-549-5358	rnail@etowahcounty.org



8.0 Agency Certification

Reference Parts VI.A.2 and VII.G

I certify under penalty of law that this document and all attachments pertaining to Etowah County were prepared under my direction 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.

A handwritten signature in blue ink, appearing to read "Shane Ellison", is written over a horizontal line.

Shane Ellison, Chief Administrative Officer
Etowah County, Alabama

A handwritten date "5-28-25" in blue ink is written over a horizontal line.

Date

APPENDICES

Appendix A – Figures

Appendix B – Charts and Statistics

Appendix C – Monitoring Reports

Appendix D – Public Education and Involvement

Appendix E – Illicit Discharge Detection and Elimination

Appendix F – Construction Site Storm Water Runoff

Appendix G – Post-Construction Storm Water Management

Appendix H – Pollution Prevention for Municipal Operation

Note: Due to size constraints, Appendix A – H are not available for viewing online. Full supporting documentation is available upon request at the Etowah County Engineering Department located at 402 Tuscaloosa Avenue, Gadsden, Alabama 35901. Our office number is 256-549-5358.