

# **ANNUAL REPORT**

**APRIL 1, 2015 - MARCH 31, 2016** 

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

March 2016

Prepared By:



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S&ME Project No. 4482-15-042

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#### 1. INTRODUCTION

S&ME, Inc. has prepared this Annual Report for the *Gadsden, Alabama Urbanized Area* Phase II Small Municipal Separate Storm Sewer System in accordance with S&ME Proposal No. 44-1500219, dated June 30, 2015. Authorization date and responsible official for each entity are provided in Table 1.1.

**Entity** Name Date Wally Burns, Mayor City of Southside July 7, 2015 Larry Payne, President **Etowah County** July 21, 2015 Sherman Guyton, Mayor City of Gadsden July 29, 2015 City of Attalla Larry Means, Mayor August 5, 2015 August 14, 2015 Jeff Cheatwood, Mayor City of Hokes Bluff Charles C. Gilchrist, Mayor City of Glencoe July 14, 2015

**Table 1-1: Responsible Officials of MS4 Entities** 

Rainbow City did not contract with S&ME to prepare their Annual Report for the 2015-2016 reporting period. They are submitting their report under a separate cover.

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

#### 1.1 Urbanized Area Designation

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

#### 1.2 Gadsden-Etowah MS4 Area

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

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Table 1-2: Gadsden-Etowah MS4 Entities

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

# 1.3 Hydrologic Units in the Urbanized Area

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

Table 1-3: Subwatersheds in the Urbanized Area

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

# 1.4 Water Quality Concerns

Section 303(d) of the Clean Water Act (CWA), as amended by the Water Quality Act of 1987, and the USEPA Water Quality Planning and Management Regulations (40CFR130) require states to identify waterbodies not in compliance with the water quality standards applicable to

their designated use classifications. Section 303(d) then requires that total maximum daily loads (TMDLs) be determined for all pollutants causing violation of applicable water quality standards in each identified segment.

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

Table 1-4: Impaired Waterbody Segments in the Urbanized Area

ASSESSMENT UNIT ID	WATERBODY NAME	USES	CAUSES	SOURCES	
AL03150106-0309-101	Coosa River (Neely Henry Lake)	Swimming Fish & Wildlife	Nutrients pH Organic Enrichment (CBOD, NBOD)	Industrial Municipal Flow regulation/modification Upstream sources	
AL03150106-0309-102	Coosa River (Neely Henry Lake)	Fish & Wildlife	Nutrients pH Organic Enrichment (CBOD, NBOD)	Industrial Municipal Flow regulation/modification Upstream sources	
AL03150106-0104-101	Coosa River (Neely Henry Lake)	Fish & Wildlife	Nutrients pH Organic Enrichment (CBOD, NBOD) Priority Organics (PCBs)	Industrial Municipal Flow regulation/modification Upstream sources Contaminated sediments	
AL03150106-0104-102	Coosa River (Neely Henry Lake)	Public Water Supply Fish & Wildlife	Nutrients pH Organic Enrichment (CBOD, NBOD) Priority Organics (PCBs)	Industrial Municipal Flow regulation/modification Upstream sources Contaminated sediments	

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

#### 1.5 Storm Water Management Program

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

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

6. Pollution Prevention/Good Housekeeping for Municipal Operations

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

#### 1.6 Annual Review and Updates to the SWMP

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

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

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

#### 1.7 Annual Report Components

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

- 1. The status of the Permittee's compliance with permit conditions
- 2. An assessment of the appropriateness of the BMPs identified in the SWMP
- 3. Progress towards achieving the goal of reducing pollutants to the maximum extent practicable (MEP)
- 4. Measurable goals for each of the minimum control measures.
- 5. Results of information collected and analyzed during the reporting period
- 6. A summary of storm water activities the Permittee plans to undertake during the next reporting cycle

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- 7. A implementation schedule for the planned storm water activities
- 8. Proposed changes to the SWMP
- 9. Notice of reliance on another government entity to satisfy permit obligations
- 10. All monitoring results collected during the reporting period

#### 1.8 Coordination Between Entities

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

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

#### 1.9 Responsible Party

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

Table 1-5: MS4 Storm Water Steering Committee – March 2016

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

#### 2. MONITORING

#### 2.1 Rationale Statement

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

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

# 2.2 Monitoring Parameters

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

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

#### 2.3 Monitoring Locations

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

The primary monitoring locations selected for determining compliance of the Gadsden-Etowah MS4 with the 2008 phosphorous TMDL are identified on Figure 2 in **Appendix A**. Coordinates for each point are listed in Table 5. Secondary monitoring locations have also been selected in the event monitoring of the primary points indicates a need for further assessment of a tributary to the Coosa River.

**Table 1-6: Monitoring Point Coordinates** 

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OUTFALL ID	LATITUDE	LONGITUDE	WATERBODY EVALUATED
AT 5 34.006446° -86.06		-86.069061°	Big Wills Creek / Little Wills Creek
GD 8	33.999535°	-86.024463°	Black Creek
RC 2	33.967683°	-86.039476°	Horton Creek
SS 13	33.891352°	-86.049229°	U.T. to Neely Henry Lake
SS 14	33.885921°	-86.030683°	U.T. to Neely Henry Lake
GD 12	33.952567°	-86.003495°	U.T. to Neely Henry Lake
CO 14	33.940904°	-85.967704°	U.T. to Neely Henry Lake
SME 2	34.002461°	-86.001571°	U.T. to Coosa River
GD 6	34.015350°	-85.995617°	Town Creek
CO 15	33.972280°	-85.965354°	U.T. to Neely Henry Lake
RC 14	33.905786°	-86.111656°	Rook Creek / Dry Creek
SS 5	33.941329°	-86.021569°	U.T. to Coosa River
SME 1	33.990184°	-86.004048°	Big Wills Creek / Black Creek
GD 9	33.989718°	-85.998472°	U.T. to Coosa River (East Gadsden)
GD 7	34.008361°	-85.999777°	Storm sewer outfall to Coosa River
GD 5	34.014324°	-85.924013°	Big Cove Creek / Little Cove Creek
GD 3	34.012380°	-85.953651°	U.T. to Neely Henry Lake
SME 3	34.009698°	-85.956230°	Coal Creek
HB 3	34.002129°	-85.882808°	U.T. to Neely Henry Lake

# 2.4 Monitoring Events

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

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**Table 1-7: Monitoring Events** 

MS4 REPORTING PERIOD	MONITORING EVENT	DATE(S) MONITORING CONDUCTED
April 1, 2012 - March 31, 2013	2013 Q1	March 12-13, 2013
	2013 Q2	May 8 and 20, 2013
April 1 2012 March 21 2014	2013 Q3	September 23, 2013
April 1, 2013 – March 31, 2014	2013 Q4	December 10, 2013
	2014 Q1	February 6, 2014
	2014 Q2	June 26, 2014
April 1, 2014 – March 31, 2015	2014 Q3	September 30, 2014
April 1, 2014 – March 31, 2015	2014 Q4	November 19, 2014
	2015 Q1	March 23, 2015
	2015 Q2	April 22, 2015
April 1 2015 March 21 2016	2015 Q3	September 30, 2015
April 1, 2015 – March 31, 2016	2015 Q4	November 19, 2015
	2016 Q1	March 15, 2016

A monitoring report was issued to the members of the Steering Committee following each monitoring event. Copies of the reports and/or field sheets for the monitoring events conducted during the April 1, 2015 to March 31, 2016 reporting period are provided in **Appendix B**.

# 2.5 Analysis of Monitoring Results

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

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

### 2.5.1 Monitoring Point AT5

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

seven square miles of the Gadsden-Etowah MS4 contribute to Big Wills Creek upstream of monitoring point AT5.

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

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

,,					
PARAMETER	MINIMUM	MAXIMUM	MEDIAN	AVERAGE	SD
Turbidity (NTU)	14.9	934.0	30.2	104.0	240.3
pH (su)	4.06	8.69	6.37	6.48	1.34
Dissolved Oxygen (mg/L)	2.59	20.43	10.23	10.65	5.05
Temperature (°C)	6.91	23.89	14.98	15.68	5.60
Nitrate-Nitrite (mg/;)	0.3	1.8	0.8	0.9	0.4
Orthophosphate (mg/L)	0.07	0.66	0.26	0.27	0.17
Total Phosphorous (mg/L)	0.11	0.86	0.29	0.31	0.21
Total Kjeldahl Nitrogen (mg/L)	0.27	0.97	0.38	0.51	0.23
Total Suspended Solids (mg/L)	14	76	22	33	22

Table 1-8: Basic Statistical Summary of Water Data for AT5

As previously discussed, the Gadsden-Etowah MS4 encompasses approximately 1.9% of the Big Wills Creek watershed; therefore, there is potential for the elevated levels to be a result of upstream activities outside of the MS4 area. The Gadsden-Etowah MS4 will continue to monitor point AT5 during the April 1, 2016 to March 31, 2017 reporting period. If elevated levels of phosphorous and nitrogen continue to be observed, the Gadsden-Etowah MS4 may consider the addition of upstream monitoring points to verify whether or not the source is external to the MS4 area.

#### 2.5.2 Monitoring Point SME1

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

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

#### 3. REPORTING AND RECORD-KEEPING

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

# 3.1 Annual Reports

This Annual Report covers April 1, 2015 through March 31, 2016 and includes:

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

#### 3.2 Recordkeeping

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

The following is a list of records to be retained:

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

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#### 4. CITY OF GADSDEN

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

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

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

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

#### 4.1 Public Education and Outreach

### 4.1.1 2015 to 2016 Implementation Status

During the April 1, 2015 to March 31, 2016 reporting period, the City of Gadsden completed eight (8) of the nine (9) Public Education and Outreach strategies identified in the previous Annual Report and failed to meet one (1) strategy.

Water Quality Awareness Week was not promoted during this reporting period (Activity 3) due to a timing issue.

The City of Gadsden also completed ten (10) strategies beyond those proposed in the previous Annual Report. These strategies were:

- The City of Gadsden maintained EPA posters on storm water and the Construction Industry outside the Building Department window (Activity 7a)
- The City of Gadsden maintained EPA bookmarks in the library (Activity 10)
- The City of Gadsden placed and maintained "No Dumping" or "No Littering" signs in problem areas (Activity 11)
- The City of Gadsden has maintained the Black Creek Trail along the creek (Activity 12)
- The City of Gadsden has promoted and participated in tire removal cleanups at James D. Wildlife Park and Cornelia Street (Activity 13)
- The City of Gadsden supported the Gadsden Beautification Board (Activity 14)

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• The City of Gadsden has a Facebook page where events and council meetings are advertised on the page as well as photos from events promoted by the City (Activity 15)

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- The City of Gadsden is constructing the Coosa Riverfront Park along the Coosa River (Activity 16)
- The City of Gadsden promoted and participated in an Arbor Day Celebration (Activity 17)
- The City of Gadsden coordinated and participated in cleanups along Black Creek (Activity 18)

A table identifying each Public Education and Outreach strategy planned for the 2015-2016 reporting period, a description of actions taken by the City of Gadsden, and a brief description of activities planned for the next reporting period is provided in **Appendix C**. Supporting documentation is also included in **Appendix C**.

### 4.1.2 Proposed Activities for the April 1, 2016 to March 31, 2017 Reporting Period

The City will implement the activities listed in the Annual Report for the 2014-2015 reporting period as part of their Public Education and Outreach Program during the 2016-2017 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

### 4.1.3 Proposed Changes

The City of Gadsden requests no changes to the Public Education and Outreach strategies identified in the 2012 SWMP or the Annual Report for the 2014-2015 reporting period.

### 4.1.4 Responsible Party

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

# 4.2 Public Involvement and Participation

# 4.2.1 2015 to 2016 Implementation Status

During the April 1, 2015 to March 31, 2016 reporting period, the City of Gadsden completed seven (7) of the seven (7) Public Involvement and Participation strategies identified in the previous Annual Report.

The City of Gadsden also completed ten (10) strategies beyond those proposed in the previous Annual Report. These strategies included:

- The City of Gadsden maintained a drop-off recycling center (Activity 8)
- Mr. Jeramy Ward attended the ADEM "Nonpoint Source Conference" (Activity 9)
- Mr. Jeramy Ward attended the Coosa River Basin Steering Committee and the Middle Coosa River Basin Steering Committee Meeting (Activity 10)

• Mr. Jeramy Ward spoke at the Coosa River Basin State of Our Watershed conference and Alabama Clean Water Partnership Watershed Conference (Activity 11)

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- The City of Gadsden supported the Gadsden Beautification Board (Activity 12)
- The City of Gadsden participated and provided in-kind services for the Habitat Dragon Boat Festival (Activity 13)
- The City of Gadsden monetarily sponsored the Alabama Clean Water Partnership Watershed Conference (Activity 14)
- The City of Gadsden purchased and placed recycling trailers and cans at City facilities and at surrounding county facilities (Activity 15)
- The City of Gadsden promoted and participated in an Arbor Day Celebration (Activity 16)
- The City of Gadsden coordinated and participated in cleanups along Black Creek (Activity 18)

A table identifying each Public Involvement and Participation strategy planned for the 2015-2016 reporting period, a description of actions taken by the City of Gadsden, and a description of activities planned for the next reporting period is provided in **Appendix C**. Supporting documentation is also included in **Appendix C**.

# 4.2.2 Proposed Activities for the April 1, 2016 to March 31, 2017 Reporting Period

The City will implement the activities listed in the Annual Report for the 2014-2015 reporting period as part of their Public Involvement and Participation Program during the 2016-2017 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

#### 4.2.3 Proposed Changes

The City of Gadsden requests no changes to the Public Involvement and Participation strategies identified in the 2012 SWMP or the Annual Report for the 2014-2015 reporting period.

#### 4.2.4 Responsible Party

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

### 4.3 Illicit Discharge Detection and Elimination

# 4.3.1 2015 to 2016 Implementation Status

During the April 1, 2015 to March 31, 2016 reporting period, the City of Gadsden completed nineteen (19) of the nineteen (19) Illicit Discharge Detection and Elimination strategies identified in the previous Annual Report.

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

- Mr. Jeramy Ward attended the Nonpoint Source Conference (Activity 20)
- Mr. Jeramy Ward attended the Clear Water Alabama Field Day 2015 Seminar and Site Visits (Activity 21)

A table identifying each Illicit Discharge Detection and Elimination strategy planned for the 2015-2016 reporting period, a description of actions taken by the City of Gadsden, and a description of activities planned for the next reporting period is provided in **Appendix C**. Supporting documentation is also included in **Appendix C**.

### 4.3.2 Proposed Activities for the April 1, 2016 to March 31, 2017 Reporting Period

The City will implement the activities listed in the Annual Report for the 2014-2015 reporting period as part of their Illicit Discharge Detection and Elimination Program during the 2016-2017 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

#### 4.3.3 Proposed Changes

The City of Gadsden requests no changes to the Illicit Discharge Detection and Elimination strategies identified in the 2012 SWMP or the Annual Report for the 2014-2015 reporting period.

# 4.3.4 Responsible Party

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

#### 4.4 Construction Site Storm Water Runoff

#### 4.4.1 2015 to 2016 Implementation Status

During the April 1, 2015 to March 31, 2016 reporting period, the City of Gadsden completed seven (7) of the seven (7) Construction Site Storm Water Runoff strategies identified in the previous Annual Report.

The City of Gadsden also completed three (3) strategies beyond those proposed in the previous Annual Report:

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

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• The City of Gadsden Engineering Employees discussed with the contractor's responsibility for Erosion and Sediment Control during construction project meetings (Activity 10)

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A table identifying each Construction Site Storm Water Runoff strategy planned for the 2015-2016 reporting period, a description of actions taken by the City of Gadsden, and a description of activities planned for the next reporting period is provided in **Appendix C**. Supporting documentation is also included in **Appendix C**.

### 4.4.2 Proposed Activities for the April 1, 2016 to March 31, 2017 Reporting Period

The City will implement the activities listed in the Annual Report for the 2014-2015 reporting period as part of their Construction Site Storm Water Runoff Program during the 2016-2017 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

#### 4.4.3 Proposed Changes

The City of Gadsden requests no changes to the Construction Site Storm Water Runoff strategies identified in the 2012 SWMP or the Annual Report for the 2014-2015 reporting period.

#### 4.4.4 Responsible Party

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

### 4.5 Post-Construction Storm Water Management

#### 4.5.1 2015 to 2016 Implementation Status

During the April 1, 2015 to March 31, 2016 reporting period, the City of Gadsden completed four (4) of the four (4) Post-Construction Storm Water Management strategies identified in the previous Annual Report.

A table identifying each Post-Construction Storm Water Management strategy planned for the 2015-2016 reporting period, a description of actions taken by the City of Gadsden, and a description of activities planned for the next reporting period is provided in **Appendix C**. Supporting documentation is also included in **Appendix C**.

# 4.5.2 Proposed Activities for the April 1, 2016 to March 31, 2017 Reporting Period

The City will implement the activities listed in the Annual Report for the 2014-2015 reporting period as part of their Post-Construction Storm Water Management Program during the 2016-2017 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

### 4.5.3 Proposed Changes

The City of Gadsden requests no changes to the Post-Construction Storm Water Management strategies identified in the 2012 SWMP or the Annual Report for the 2014-2015 reporting period.

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#### 4.5.4 Responsible Party

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

#### 4.6 Pollution Prevention and Good Housekeeping for Municipal Operations

#### 4.6.1 2015 to 2016 Implementation Status

During the April 1, 2015 to March 31, 2016 reporting period, the City of Gadsden completed six (6) of the six (6) Pollution Prevention and Good Housekeeping for Municipal Operations strategies identified in the previous Annual Report.

The City of Gadsden also completed ten (10) strategies beyond those proposed in the previous Annual Report. These strategies include:

- Petroleum spill kits are maintained on municipal trucks and equipment and replaced when needed (Activity 7)
- The City provided brush and leaf pick-up throughout the City (Activity 8)
- Jeramy Ward is now a Certified Professional in Erosion and Sediment Control (Activity
   9)
- Jeramy Ward is now a Certified Professional in Municipal Stormwater Management. (CPMSM) (Activity 10)
- Inmates crews are used to pick up litter throughout the city (Activity 11)
- The City of Gadsden enforced it's litter ordinance (Activity 12)
- The City of Gadsden recycled copy paper and newspapers at City Hall (Activity 13)
- The City of Gadsden promoted and participated in tire removal cleanups at James D. Wildlife Park and Cornelia Street (Activity 14)
- The City of Gadsden purchased and placed recycling trailers and cans at City facilities and at surrounding county facilities (Activity 15)

A table identifying each Pollution Prevention and Good Housekeeping for Municipal Operations strategy planned for the 2015-2016 reporting period, a description of actions taken by the City of Gadsden, and a description of activities planned for the next reporting period is provided in **Appendix C**. Supporting documentation is also included in **Appendix C**.

# 4.6.2 Proposed Activities for the April 1, 2016 to March 31, 2017 Reporting Period

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The City will implement the activities listed in the Annual Report for the 2014-2015 reporting period as part of their Pollution Prevention and Good Housekeeping for Municipal Operations Program during the 2016-2017 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

#### 4.6.3 Proposed Changes

The City of Gadsden requests no changes to the Pollution Prevention and Good Housekeeping for Municipal Operations strategies identified in the 2012 SWMP or the Annual Report for the 2014-2015 reporting period.

# 4.6.4 Responsible Party

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

# 4.7 Agency Certification

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

I certify under penalty of law that this document and all attachments pertaining to the City of Gadsden were prepared under my directions or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine or imprisonment for knowing violations.

Sherman Guyton, Mayor	 Date
City of Gadsden, Alabama	

# 5. RAINBOW CITY

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

Rainbow City did not contract with S&ME to prepare their Annual Report for the 2015-2016 reporting period. They are submitting their report under a separate cover.

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# 6. REECE CITY

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

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

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# 7. CITY OF SOUTHSIDE

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

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

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

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

#### 7.1 Public Education and Outreach

#### 7.1.1 2015 to 2016 Implementation Status

During the April 1, 2015 to March 31, 2016 reporting period, the City of Southside completed ten (10) of the ten (10) Public Education and Outreach strategies identified in the previous Annual Report.

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

- The City of Southside provided educational pamphlets to the City Council Members (Activity 11)
- The City of Southside placed bookmarks in the library and educational materials in the community center (Activity 12)
- The City of Southside displayed educational signs in the City Hall (Activity 13)
- The City of Southside used digital signs to advertise events (Activity 14)
- The City of Southside coordinated three cleanup days (Activity 15)
- The City of Southside maintained three "No Dumping" signs within the City (Activity 17)
- The City maintained 20 "No Littering" Signs within the City (Activity 18)

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A table identifying each Public Education and Outreach strategy planned for the 2015-2016 reporting period, a description of actions taken by the City of Southside, and a description of activities planned for the next reporting period is provided in **Appendix F**. Supporting documentation is also included in **Appendix F**.

#### 7.1.2 Proposed Activities for the April 1, 2016 to March 31, 2017 Reporting Period

The City will implement the activities listed in the Annual Report for the 2014-2015 reporting period as part of their Public Education and Outreach Program during the 2016-2017 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

### 7.1.3 Proposed Changes

The City of Southside requests no changes to the Public Involvement and Participation strategies identified in the 2012 SWMP or the Annual Report for the 2014-2015 reporting period.

### 7.1.4 Responsible Party

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

#### 7.2 Public Involvement and Participation

### 7.2.1 2015 to 2016 Implementation Status

During the April 1, 2015 to March 31, 2016 reporting period, the City of Southside completed eight (8) of the eight (8) Public Involvement and Participation strategies identified in the previous Annual Report and began working on the remaining one (1) strategy.

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

- Mr. Jimmy Whittemore and Mr. Daryl Sanders attended the ADEM "Nonpoint Source Conference" (Activity 9)
- The City of Southside recycled aluminum cans in the break room of the City Hall (Activity 10)
- The City of Southside recycled metal from City projects (Activity 11)
- The City of Southside collected used oil at the maintenance shop for recycling (Activity 12)
- The City of Southside advertised the Gadsden Recycling Center on their webpage (Activity 13)
- The City of Southside has a Nuisance and Abatement Ordinance and an enforcement officer to investigate complaints of abandoned property, trash, debris, abandoned vehicles, unkept lawns, etc. (Activity 14)

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- Mr. Darryl Sanders attended the Alabama Clean Water Partnership Watershed Conference (Activity 15)
- Jimmy Whittemore and Darryl Sanders attended the Alabama Clean Water Partnership Coosa River Basin State of Our Watershed (Activity 16)

A table identifying each Public Involvement and Participation strategy planned for the 2015-2016 reporting period, a description of actions taken by the City of Southside, and a description of activities planned for the next reporting period is provided in **Appendix F**. Supporting documentation is also included in **Appendix F**.

# 7.2.2 Proposed Activities for the April 1, 2016 to March 31, 2017 Reporting Period

The City will implement the activities listed in the Annual Report for the 2014-2015 reporting period as part of their Public Involvement and Participation Program during the 2016-2017 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

### 7.2.3 Proposed Changes

The City of Southside requests no changes to the Public Involvement and Participation strategies identified in the 2012 SWMP or the Annual Report for the 2014-2015 reporting period.

### 7.2.4 Responsible Party

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

# 7.3 Illicit Discharge Detection and Elimination

#### 7.3.1 2015 to 2016 Implementation Status

During the April 1, 2015 to March 31, 2016 reporting period, the City of Southside completed seventeen (17) of the seventeen (17) Illicit Discharge Detection and Elimination strategies identified in the previous Annual Report.

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

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

A table identifying each Illicit Discharge Detection and Elimination strategy planned for the 2015-2016 reporting period, a description of actions taken by the City of Southside, and a description of activities planned for the next reporting period is provided in **Appendix F**. Supporting documentation is also included in **Appendix F**.

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### 7.3.2 Proposed Activities for the April 1, 2016 to March 31, 2017 Reporting Period

The City will implement the activities listed in the Annual Report for the 2014-2015 reporting period as part of their Illicit Discharge Detection and Elimination Program during the 2016-2017 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

#### 7.3.3 Proposed Changes

The City of Southside requests no changes to the Illicit Discharge Detection and Elimination strategies identified in the 2012 SWMP or the Annual Report for the 2014-2015 reporting period.

#### 7.3.4 Responsible Party

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

#### 7.4 Construction Site Storm Water Runoff

#### 7.4.1 2015 to 2016 Implementation Status

During the April 1, 2015 to March 31, 2016 reporting period, the City of Southside completed six (6) of the six (6) Construction Site Storm Water Runoff strategies identified in the previous Annual Report.

A table identifying each Construction Site Storm Water Runoff strategy planned for the 2015-2016 reporting period, a description of actions taken by the City of Southside, and a description of activities planned for the next reporting period is provided in **Appendix F**. Supporting documentation is also included in **Appendix F**.

# 7.4.2 Proposed Activities for the April 1, 2016 to March 31, 2017 Reporting Period

The City will implement the activities listed in the Annual Report for the 2014-2015 reporting period as part of their Construction Site Storm Water Runoff Program during the 2016-2017 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

### 7.4.3 Proposed Changes

The City of Southside requests no changes to the Construction Site Storm Water Runoff strategies identified in the 2012 SWMP or the Annual Report for the 2014-2015 reporting period.

#### 7.4.4 Responsible Party

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

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### 7.5 Post-Construction Storm Water Management

#### 7.5.1 2015 to 2016 Implementation Status

During the April 1, 2015 to March 31, 2016 reporting period, the City of Southside completed three (3) of the four (4) Post-Construction Storm Water Management strategies identified in the previous Annual Report and continued working on one (1) strategy.

The City Storm Water Manager is still discussing with the Planning Commission concerning the subject of revising the regulations to require a greener infrastructure; however revisions were not made during this reporting period (Activity 4).

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

• The City of Southside maintained a detention pond, to alleviate occasional flooding of Powell St. & pooling around a residential structure (Activity 5).

A table identifying each Post-Construction Storm Water Management strategy planned for the 2015-2016 reporting period, a description of actions taken by the City of Southside, and a description of activities planned for the next reporting period is provided in **Appendix F**. Supporting documentation is also included in **Appendix F**.

# 7.5.2 Proposed Activities for the April 1, 2016 to March 31, 2017 Reporting Period

The City will implement the activities listed in the Annual Report for the 2014-2015 reporting period as part of their Post-Construction Storm Water Management Program during the 2016-2017 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

# 7.5.3 Proposed Changes

The City of Southside requests no changes to the Post-Construction Storm Water Runoff strategies identified in the 2012 SWMP or the Annual Report for the 2014-2015 reporting period.

# 7.5.4 Responsible Party

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

# 7.6 Pollution Prevention and Good Housekeeping for Municipal Operations

# 7.6.1 2015 to 2016 Implementation Status

During the April 1, 2015 to March 31, 2016 reporting period, the City of Southside completed four (4) of the four (4) Pollution Prevention and Good Housekeeping for Municipal Operations strategies identified in the previous Annual Report.

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

- The City of Southside used minimal amounts of herbicides at ball fields (Activity 5)
- Four employees received chemical spill training (Activity 6)
- The City placed materials to respond to spills at the maintenance shop (Activity 7)
- The City of Southside provided large-item trash pick-up (Activity 8)
- The City recycled aluminum cans in the break room at the City Hall (Activity 9)
- The City recycled metal from city projects (Activity 10)
- The City collected used oil at the Maintenance Shop for recycling (Activity 11)
- The City advertised the Gadsden Recycling Center on the webpage (Activity 12)
- The County provided prisoner cleanup along City, County, and State right-of-ways upon request (Activity 13)
- The City provided containment facilities for Used Oil & Off Road Diesel Storage Tanks (Activity 14)
- The City has a Nuisance and Abatement Ordinance and an enforcement officer to investigate complaints of abandoned property, trash, debris, abandoned vehicles, unkept lawns, etc. (Activity 15)

A table identifying each Pollution Prevention and Good Housekeeping for Municipal Operations strategy planned for the 2015-2016 reporting period, a description of actions taken by the City of Southside, and a description of activities planned for the next reporting period is provided in **Appendix F**. Supporting documentation is also included in **Appendix F**.

# 7.6.2 Proposed Activities for the April 1, 2016 to March 31, 2017 Reporting Period

The City will implement the activities listed in the Annual Report for the 2014-2015 reporting period as part of their Pollution Prevention and Good Housekeeping for Municipal Operations Program during the 2016-2017 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

### 7.6.3 Proposed Changes

The City of Southside requests no changes to the Pollution Prevention and Good Housekeeping for Municipal Operations strategies identified in the 2012 SWMP or the Annual Report for the 2014-2015 reporting period.

# 7.6.4 Responsible Party

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

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# 7.7 Agency Certification

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

I certify under penalty of law that this document and all attachments pertaining to the City of Southside were prepared under my directions or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine or imprisonment for knowing violations.

Wally Burns, Mayor	Date
City of Southside, Alabama	

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#### 8. CITY OF GLENCOE

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

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

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

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

#### 8.1 Public Education and Outreach

#### 8.1.1 2015 to 2016 Implementation Status

During the April 1, 2015 to March 31, 2016 reporting period, the City of Glencoe completed six (6) of the seven (7) Public Education and Outreach strategies identified in the previous Annual Report but failed to meet one (1) strategy.

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

A table identifying each Public Education and Outreach strategy planned for the 2015-2016 reporting period, a description of actions taken by the City of Glencoe, and a description of activities planned for the next reporting period is provided in **Appendix G**. Supporting documentation is also included in **Appendix G**.

# 8.1.2 Proposed Activities for the April 1, 2016 to March 31, 2017 Reporting Period

The City will implement the activities listed in the Annual Report for the 2014-2015 reporting period as part of their Public Education and Outreach Program during the 2016-2017 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

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### 8.1.3 Proposed Changes

The City of Glencoe requests no changes to the Public Education and Outreach strategies identified in the 2012 SWMP or the Annual Report for the 2014-2015 reporting period.

### 8.1.4 Responsible Party

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

#### 8.2 Public Involvement and Participation

#### 8.2.1 2015 to 2016 Implementation Status

During the April 1, 2015 to March 31, 2016 reporting period, the City of Glencoe completed four (4) of the six (6) Public Involvement and Participation strategies identified in the previous Annual Report but failed to meet two (2) of the strategies.

The City of Glencoe did not participate or promote Renew Our Rivers (Activity 4).

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

A table identifying each Public Involvement and Participation strategy planned for the 2015-2016 reporting period, a description of actions taken by the City of Glencoe, and a description of activities planned for the next reporting period is provided in **Appendix G**. Supporting documentation is also included in **Appendix G**.

# 8.2.2 Proposed Activities for the April 1, 2016 to March 31, 2017 Reporting Period

The City will implement the activities listed in the Annual Report for the 2014-2015 reporting period as part of their Public Involvement and Participation Program during the 2016-2017 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

#### 8.2.3 Proposed Changes

The City of Glencoe requests no changes to the Public Involvement and Participation strategies identified in the 2012 SWMP or in the Annual Report for the 2014-2015 reporting period.

# 8.2.4 Responsible Party

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

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### 8.3 Illicit Discharge Detection and Elimination

#### 8.3.1 2015 to 2016 Implementation Status

During the April 1, 2015 to March 31, 2016 reporting period, the City of Glencoe completed seventeen (17) of the seventeen (17) Illicit Discharge Detection and Elimination strategies identified in the previous Annual Report.

A table identifying each Illicit Discharge Detection and Elimination strategy planned for the 2015-2016 reporting period, a description of actions taken by the City of Glencoe, and a description of activities planned for the next reporting period is provided in **Appendix G**. Supporting documentation is also included in **Appendix G**.

### 8.3.2 Proposed Activities for the April 1, 2016 to March 31, 2017 Reporting Period

The City will implement the activities listed in the Annual Report for the 2014-2015 reporting period as part of their Illicit Discharge Detection and Elimination Program during the 2016-2017 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

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

#### 8.3.3 Proposed Changes

The City of Glencoe requests no changes to the Illicit Discharge Detection and Elimination strategies identified in the 2012 SWMP or in the Annual Report for the 2014-2015 reporting period.

### 8.3.4 Responsible Party

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

#### 8.4 Construction Site Storm Water Runoff

#### 8.4.1 2015 to 2016 Implementation Status

During the April 1, 2015 to March 31, 2016 reporting period, the City of Glencoe completed six (6) of the six (6) Construction Site Storm Water Runoff strategies identified in the previous Annual Report.

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A table identifying each Construction Site Storm Water Runoff strategy planned for the 2015-2016 reporting period, a description of actions taken by the City of Glencoe, and a description of activities planned for the next reporting period is provided in **Appendix G**. Supporting documentation is also included in **Appendix G**.

#### 8.4.2 Proposed Activities for the April 1, 2016 to March 31, 2017 Reporting Period

The City will implement the activities listed in the Annual Report for the 2014-2015 reporting period as part of their Construction Site Storm Water Runoff Program during the 2016-2017 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

#### 8.4.3 Proposed Changes

The City of Glencoe requests no changes to the Construction Site Storm Water Runoff strategies identified in the 2012 SWMP or in the Annual Report for the 2014-2015 reporting period.

# 8.4.4 Responsible Party

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

# 8.5 Post-Construction Storm Water Management

#### 8.5.1 2015 to 2016 Implementation Status

During the April 1, 2015 to March 31, 2016 reporting period, the City of Glencoe completed four (4) of the four (4) Post-Construction Storm Water Management strategies identified in the previous Annual Report.

The City of Glencoe also completed one (1) strategy beyond those proposed in the previous Annual Report. These strategies included:

• The City of Glencoe maintained valley gutters throughout the City (Activity 5)

A table identifying each Post-Construction Storm Water Management strategy planned for the 2015-2016 reporting period, a description of actions taken by the City of Glencoe, and a description of activities planned for the next reporting period is provided in **Appendix G**. Supporting documentation is also included in **Appendix G**.

# 8.5.2 Proposed Activities for the April 1, 2016 to March 31, 2017 Reporting Period

The City will implement the activities listed in the Annual Report for the 2014-2015 reporting period as part of their Post-Construction Storm Water Management Program during the 2016-2017 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

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# 8.5.3 Proposed Changes

The City of Glencoe requests no changes to the Post-Construction Storm Water Runoff strategies identified in the 2012 SWMP or in the Annual Report for the 2014-2015 reporting period.

#### 8.5.4 Responsible Party

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

#### 8.6 Pollution Prevention and Good Housekeeping for Municipal Operations

#### 8.6.1 2015 to 2016 Implementation Status

During the April 1, 2015 to March 31, 2016 reporting period, the City of Glencoe completed four (4) of the four (4) Pollution Prevention and Good Housekeeping for Municipal Operations strategies identified in the previous Annual Report.

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

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

A table identifying each Pollution Prevention and Good Housekeeping for Municipal Operations strategy planned for the 2015-2016 reporting period, a description of actions taken by the City of Glencoe, and a description of activities planned for the next reporting period is provided in **Appendix G**. Supporting documentation is also included in **Appendix G**.

# 8.6.2 Proposed Activities for the April 1, 2016 to March 31, 2017 Reporting Period

The City will implement the activities listed in the Annual Report for the 2014-2015 reporting period as part of their Pollution Prevention and Good Housekeeping for Municipal Operations Program during the 2016-2017 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

# 8.6.3 Proposed Changes

The City of Glencoe requests no changes to the Pollution Prevention and Good Housekeeping for Municipal Operations strategies identified in the 2012 SWMP or in the Annual Report for the 2014-2015 reporting period.

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# 8.6.4 Responsible Party

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

# 8.7 Agency Certification

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

I certify under penalty of law that this document and all attachments pertaining to the City of Glencoe were prepared under my directions or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine or imprisonment for knowing violations.

Charles Gilchrist, Mayor	 Date
City of Glencoe, Alabama	

S&ME Project No. 4482-15-042

#### 9. CITY OF HOKES BLUFF

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

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

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

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

#### 9.1 Public Education and Outreach

#### 9.1.1 2015 to 2016 Implementation Status

During the April 1, 2015 to March 31, 2016 reporting period, the City of Hokes Bluff completed nine (9) of the nine (9) Public Education and Outreach strategies identified in the previous Annual Report.

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

- The City of Hokes Bluff purchased an advertisement within the Hokes Bluff High School Football Program (Activity 10)
- The City of Hokes Bluff provided a storm water challenge word search to the 4 graders (Activity 11)
- The City of Hokes Bluff purchased t-shirts and gave them to participants at Hokes Bluff City Fest (Activity 12)
- The City of Hokes Bluff maintained 12 "No Littering" signs within the City (Activity 13)
- The City of Hokes Bluff maintained 1 "Pet Waste Station" (Activity 14)
- The City of Hokes Bluff celebrated Earth Day reminding citizens to recognize the day by learning to conserve, recycle and avoid pollution (Activity 15)
- The City purchased an advertisement at the Softball and Football fields that included a storm water education slogan (Activity 16)

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• The City partnered with Keep Etowah Beautiful and the Etowah County Sheriff's Department to Clean up Highway 278 since the ferry location at the park was closed due to construction (Activity 17)

A table identifying each Public Education and Outreach strategy planned for the 2015-2016 reporting period, a description of actions taken by the City of Hokes Bluff, and a brief description of activities planned for the next reporting period is provided in **Appendix H**. Supporting documentation is also included in **Appendix H**.

# 9.1.2 Proposed Activities for the April 1, 2016 to March 31, 2017 Reporting Period

The City will implement the activities listed in the Annual Report for the 2014-2015 reporting period as part of their Public Education and Outreach Program during the 2016-2017 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

# 9.1.3 Proposed Changes

The City of Hokes Bluff requests no changes to the Public Education and Outreach strategies identified in the 2012 SWMP or in the Annual Report for the 2014-2015 reporting period.

### 9.1.4 Responsible Party

The Hokes Bluff City Clerk will be responsible for coordinating the Public Education and Outreach efforts.

#### 9.2 Public Involvement and Participation

#### 9.2.1 2015 to 2016 Implementation Status

During the April 1, 2015 to March 31, 2016 reporting period, the City of Hokes Bluff completed seven (7) of the seven (7) Public Involvement and Participation strategies identified in the previous Annual Report.

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

- The City of Hokes Bluff maintained the Ferry Landing and utilizes part time labor during the months of May through October to clean up the area (Activity 8)
- The City of Hokes Bluff maintained the Mill Pond Park and utilizes part time labor during the months of May through October to clean up the area (Activity 9)
- The City of Hokes Bluff celebrated Earth Day reminding citizens to recognize the day by learning to conserve, recycle and avoid pollution (Activity 10)
- The City of Hokes Bluff provided dumpsters for disposal of extra garbage (Activity 11)

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- The City partnered with Keep Etowah Beautiful and the Etowah County Sheriff's Department to Clean up Highway 278 since the ferry location at the park was closed due to construction (Activity 12)
- Ms. Lisa Johnson attended the Alabama Clean Water Partnership Watershed Conference (Activity 13)

A table identifying each Public Involvement and Participation strategy planned for the 2015-2016 reporting period, a description of actions taken by the City of Hokes Bluff, and a description of activities planned for the next reporting period is provided in **Appendix H**. Supporting documentation is also included in **Appendix H**.

# 9.2.2 Proposed Activities for the April 1, 2016 to March 31, 2017 Reporting Period

The City will implement the activities listed in the Annual Report for the 2014-2015 reporting period as part of their Public Involvement and Participation Program during the 2016-2017 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

#### 9.2.3 Proposed Changes

The City of Hokes Bluff requests no changes to the Public Involvement and Participation strategies identified in the 2012 SWMP or in the Annual Report for the 2014-2015 reporting period.

# 9.2.4 Responsible Party

The Hokes Bluff City Clerk will be responsible for coordinating the Public Involvement and Participation efforts.

# 9.3 Illicit Discharge Detection and Elimination

#### 9.3.1 2015 to 2016 Implementation Status

During the April 1, 2015 to March 31, 2016 reporting period, the City of Hokes Bluff completed seventeen (17) of the seventeen (17) Illicit Discharge Detection and Elimination strategies identified in the previous Annual Report.

A table identifying each Illicit Discharge Detection and Elimination strategy planned for the 2015-2016 reporting period, a description of actions taken by the City of Hokes Bluff, and a description of activities planned for the next reporting period is provided in **Appendix G**. Supporting documentation is also included in **Appendix G**.

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# 9.3.2 Proposed Activities for the April 1, 2016 to March 31, 2017 Reporting Period

The City will implement the activities listed in the Annual Report for the 2014-2015 reporting period as part of their Illicit Discharge Detection and Elimination Program during the 2016-2017 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

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

#### 9.3.3 Proposed Changes

The City of Hokes Bluff requests no changes to the Illicit Discharge Detection and Elimination strategies identified in the 2012 SWMP or in the Annual Report for the 2014-2015 reporting period.

### 9.3.4 Responsible Party

The Hokes Bluff City Clerk will be responsible for overseeing, coordinating, and enforcing the IDDE program in the City of Hokes Bluff regulated MS4 area.

#### 9.4 Construction Site Storm Water Runoff

#### 9.4.1 2015 to 2016 Implementation Status

During the April 1, 2015 to March 31, 2016 reporting period, the City of Hokes Bluff completed seven (7) of the seven (7) Construction Site Storm Water Runoff strategies identified in the previous Annual Report.

A table identifying each Construction Site Storm Water Runoff strategy planned for the 2015-2016 reporting period, a description of actions taken by the City of Hokes Bluff, and a description of activities planned for the next reporting period is provided in **Appendix G**. Supporting documentation is also included in **Appendix G**.

# 9.4.2 Proposed Activities for the April 1, 2016 to March 31, 2017 Reporting Period

The City will implement the activities listed in the Annual Report for the 2014-2015 reporting period as part of their Construction Site Storm Water Runoff Program during the 2016-2017 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

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#### 9.4.3 Proposed Changes

The City of Hokes Bluff requests no changes to the Construction Site Storm Water Runoff strategies identified in the 2012 SWMP or in the Annual Report for the 2014-2015 reporting period.

#### 9.4.4 Responsible Party

The Hokes Bluff City Inspector is responsible for implementing the provisions of Ordinance HB-2012-002 and maintaining records of implementation actions. The Hokes Bluff City Clerk is responsible for coordinating the evaluations required for the Annual Report.

# 9.5 Post-Construction Storm Water Management

#### 9.5.1 2015 to 2016 Implementation Status

During the April 1, 2015 to March 31, 2016 reporting period, the City of Hokes Bluff completed three (3) of the four (4) Post-Construction Storm Water Management strategies identified in the previous Annual Report and continued working on the remaining one (1) strategy.

The City of Hokes Bluff is reviewing and evaluating policies and ordinances related to building codes, or other local regulations, with a goal of identifying regulatory and policy impediments to the installation of green infrastructure and low-impact development techniques. A final evaluation has not been determined at this time (Activity 4).

A table identifying each Post-Construction Storm Water Management strategy planned for the 2015-2016 reporting period, a description of actions taken by the City of Hokes Bluff, and a description of activities planned for the next reporting period is provided in **Appendix G**. Supporting documentation is also included in **Appendix G**.

# 9.5.2 Proposed Activities for the April 1, 2016 to March 31, 2017 Reporting Period

The City will implement the activities listed in the Annual Report for the 2014-2015 reporting period as part of their Post-Construction Storm Water Management Program during the 2016-2017 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

# 9.5.3 Proposed Changes

The City of Hokes Bluff requests no changes to the Post-Construction Storm Water Management strategies identified in the 2012 SWMP or in the Annual Report for the 2014-2015 reporting period.

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# 9.5.4 Responsible Party

The Hokes Bluff City Inspector is responsible for implementing the provisions of Ordinance HB-2012-002 and maintaining records of implementation actions. The Hokes Bluff City Clerk is responsible for coordinating the evaluations required for the Annual Report.

### 9.6 Pollution Prevention and Good Housekeeping for Municipal Operations

### 9.6.1 2015 to 2016 Implementation Status

During the April 1, 2015 to March 31, 2016 reporting period, the City of Hokes Bluff completed three (3) of the three (3) Pollution Prevention and Good Housekeeping for Municipal Operations strategies identified in the previous Annual Report.

The City of Hokes Bluff completed nine (9) strategies beyond those proposed in the previous Annual Report. These strategies include:

- The City of Hokes Bluff provided brush pick-up throughout the City (Activity 4)
- The City of Hokes Bluff maintained the Ferry Landing and utilizes part time labor (Activity 5)
- The City of Hokes Bluff maintained the Mill Pond Park and utilizes part time labor (Activity 6)
- The Sherriff's department cleaned Highway 278 and County Road 71 every other month (Activity 7)
- The City of Hokes Bluff maintained 12 "No Littering" Signs within the City (Activity 8)
- The City of Hokes Bluff maintained 1 "Pet Waste Stations" (Activity 9)
- The City of Hokes Bluff allowed the public to drop off used oil for recycling at City Shop (Activity 10)
- The City of Hokes Bluff allowed the public to drop off metal for recycling at City Shop (Activity 11)
- The City of Gadsden has placed a trailer for cardboard at the City Hall. The City advertises this drop off location (Activity 12)

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

# 9.6.2 Proposed Activities for the April 1, 2016 to March 31, 2017 Reporting Period

The City will implement the activities listed in the Annual Report for the 2014-2015 reporting period as part of their Pollution Prevention and Good Housekeeping for Municipal Operations Program during the 2016-2017 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

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# 9.6.3 Proposed Changes

The City of Hokes Bluff requests no changes to the Pollution Prevention and Good Housekeeping for Municipal Operations strategies identified in the 2012 SWMP or in the Annual Report for the 2014-2015 reporting period.

#### 9.6.4 Responsible Party

The Hokes Bluff City Clerk is responsible for implementing pollution prevention and good housekeeping within municipal operations.

#### 9.7 Agency Certification

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

I certify under penalty of law that this document and all attachments pertaining to the City of Hokes Bluff were prepared under my directions or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine or imprisonment for knowing violations.

Jeff Cheatwood, Mayor	Date
City of Hokes Bluff, Alabama	

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#### 10. CITY OF ATTALLA

The City of Attalla encompasses approximately 7.5% of the Urbanized Area and accounts for approximately 9% of the population.

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

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

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

#### 10.1 Public Education and Outreach

# 10.1.1 2015 to 2016 Implementation Status

During the April 1, 2015 to March 31, 2016 reporting period, the City of Attalla completed six (6) of the six (6) Public Education and Outreach strategies identified in the previous Annual Report.

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

• The City and the Public Works Department have Facebook pages (Activity 7).

A table identifying each Public Education and Outreach strategy planned for the 2015-2016 reporting period, a description of actions taken by the City of Attalla, and a description of activities planned for the next reporting period is provided in **Appendix I**. Supporting documentation is also included in **Appendix I**.

# 10.1.2 Proposed Activities for the April 1, 2016 to March 31, 2017 Reporting Period

The City will implement the activities listed in the Annual Report for the 2014-2015 reporting period as part of their Public Education and Outreach Program during the 2016-2017 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

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# 10.1.3 Proposed Changes

The City of Attalla requests no changes to the Public Involvement and Participation strategies identified in the 2012 SWMP or in the Annual Report for the 2014-2015 reporting period.

#### 10.1.4 Responsible Party

The City of Attalla Mayor's office is responsible for overseeing, developing, and coordinating the Public Education and Outreach efforts.

# 10.2 Public Involvement and Participation

# 10.2.1 2015 to 2016 Implementation Status

During the April 1, 2015 to March 31, 2016 reporting period, the City of Attalla completed two (3) of the four (4) Public Involvement and Participation strategies identified in the previous Annual Report and failed to meet one (1) strategy.

The City of Attalla did not participate or promote Renew Our Rivers (Activity 3).

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

• Mr. Jason Nicholson attended the Alabama Clean Water Partnership Watershed Conference (Activity 5).

A table identifying each Public Involvement and Participation strategy planned for the 2015-2016 reporting period, a description of actions taken by the City of Attalla, and a description of activities planned for the next reporting period is provided in **Appendix I**. Supporting documentation is also included in **Appendix I**.

# 10.2.2 Proposed Activities for the April 1, 2016 to March 31, 2017 Reporting Period

The City will implement the activities listed in the Annual Report for the 2014-2015 reporting period as part of their Public Involvement and Participation Program during the 2016-2017 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

#### 10.2.3 Proposed Changes

The City of Attalla requests no changes to the Public Involvement and Participation strategies identified in the 2012 SWMP or in the Annual Report for the 2014-2015 reporting period.

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# 10.2.4 Responsible Party

The City of Attalla Mayor's office is responsible for overseeing, developing, and coordinating the Public Involvement and Participation efforts.

#### 10.3 Illicit Discharge Detection and Elimination

#### 10.3.1 2015 to 2016 Implementation Status

During the April 1, 2015 to March 31, 2016 reporting period, the City of Attalla completed sixteen (16) of the seventeen (17) Illicit Discharge Detection and Elimination strategies identified in the previous Annual Report and failed to meet one (1) of the strategy.

The City of Attalla did not delineated drainage basins within the MS4 boundary and did not perform IDP calculations for each basin (Activity 1).

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

• Jason Nicholson attended the Alabama Clean Water Partnership Watershed Conference (Activity 18).

A table identifying each Illicit Discharge Detection and Elimination strategy planned for the 2015-2016 reporting period, a description of actions taken by the City of Attalla, and a description of activities planned for the next reporting period is provided in **Appendix I**. Supporting documentation is also included in **Appendix I**.

# 10.3.2 Proposed Activities for the April 1, 2016 to March 31, 2017 Reporting Period

The City will implement the activities listed in the Annual Report for the 2014-2015 reporting period as part of their Illicit Discharge Detection and Elimination Program during the 2016-2017 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

### 10.3.3 Proposed Changes

The City of Attalla requests no changes to the Illicit Discharge Detection and Elimination strategies identified in the 2012 SWMP or in the Annual Report for the 2014-2015 reporting period.

# 10.3.4 Responsible Party

The City of Attalla Mayor's office is responsible for overseeing, developing, and coordinating the IDDE program in the City of Attalla regulated MS4 area.

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#### 10.4 Construction Site Storm Water Runoff

#### 10.4.1 2015 to 2016 Implementation Status

During the April 1, 2015 to March 31, 2016 reporting period, the City of Attalla completed six (6) of the six (6) Construction Site Storm Water Runoff strategies identified in the previous Annual Report.

A table identifying each Construction Site Storm Water Runoff strategy planned for the 2015-2016 reporting period, a description of actions taken by the City of Attalla, and a description of activities planned for the next reporting period is provided in **Appendix I**. Supporting documentation is also included in **Appendix I**.

#### 10.4.2 Proposed Activities for the April 1, 2016 to March 31, 2017 Reporting Period

The City will implement the activities listed in the Annual Report for the 2014-2015 reporting period as part of their Construction Site Storm Water Runoff Program during the 2016-2017 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

#### 10.4.3 Proposed Changes

The City of Attalla requests no changes to the Construction Site Storm Water Runoff strategies identified in the 2012 SWMP or in the Annual Report for the 2014-2015 reporting period.

#### 10.4.4 Responsible Party

The City of Attalla Mayor's office is responsible for implementing and tracking the construction site storm water provisions of the ordinance as well as other Construction Site Storm Water Runoff strategies.

#### 10.5 Post-Construction Storm Water Management

#### 10.5.1 2015 to 2016 Implementation Status

During the April 1, 2015 to March 31, 2016 reporting period, the City of Attalla failed to meet three (3) of the four (4) Post-Construction Storm Water Management strategies identified in the previous Annual Report and continued working on the remaining one (1) strategy.

The City of Attalla is continuing efforts to resolve conflicts between green infrastructure practices and existing codes/ordinances (Activity 4).

A table identifying each Post-Construction Storm Water Management strategy planned for the 2015-2016 reporting period, a description of actions taken by the City of Attalla, and a description of activities planned for the next reporting period is provided in **Appendix I**. Supporting documentation is also included in **Appendix I**.

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# 10.5.2 Proposed Activities for the April 1, 2016 to March 31, 2017 Reporting Period

The City will implement the activities listed in the Annual Report for the 2014-2015 reporting period as part of their Post-Construction Storm Water Management Program during the 2016-2017 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

#### 10.5.3 Proposed Changes

The City of Attalla requests no other changes to the Post-construction Storm Water Management strategies identified in the 2012 SWMP or for the 2014-2015 reporting period.

# 10.5.4 Responsible Party

The City of Attalla Mayor's office is responsible for implementing the provisions of the ordinance pertaining to post construction storm water management.

# 10.6 Pollution Prevention and Good Housekeeping for Municipal Operations

#### 10.6.1 2015 to 2016 Implementation Status

During the April 1, 2015 to March 31, 2016 reporting period, the City of Attalla completed three (3) of the three (3) Pollution Prevention and Good Housekeeping for Municipal Operations strategies identified in the previous Annual Report.

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

- Public Works Department cleaned curb and gutters with shovels on an as needed basis (Activity 4)
- The City of Attalla provided brush and leaf pick-up throughout the City (Activity 5)
- The City of Attalla moved the oil recycling location underneath a shelter (Activity 6)

A table identifying each Pollution Prevention and Good Housekeeping for Municipal Operations strategy planned for the 2015-2016 reporting period, a description of actions taken by the City of Attalla, and a description of activities planned for the next reporting period is provided in **Appendix I**. Supporting documentation is also included in **Appendix I**.

# 10.6.2 Proposed Activities for the April 1, 2016 to March 31, 2017 Reporting Period

The City will implement the activities listed in the Annual Report for the 2014-2015 reporting period as part of their Pollution Prevention and Good Housekeeping for Municipal Operations Program during the 2016-2017 reporting period. The City will evaluate the success of the program to aid in preparing the required Annual Report based on the evaluation criteria established for each strategy.

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# 10.6.3 Proposed Changes

The City of Attalla requests no changes to the Pollution Prevention and Good Housekeeping for Municipal Operations strategies identified in the 2012 SWMP or in the Annual Report for the 2014-2015 reporting period.

# 10.6.4 Responsible Party

The City of Attalla Mayor's office is responsible for implementing and tracking Pollution Prevention and Good Housekeeping strategies within municipal operations.

# 10.7 Agency Certification

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

I certify under penalty of law that this document and all attachments pertaining to the City of Attalla were prepared under my directions or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine or imprisonment for knowing violations.

Larry Means, Mayor	 Date
City of Attalla, Alabama	

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#### 11. ETOWAH COUNTY

Unincorporated portions of Etowah County within the *Gadsden, Alabama Urbanized Area* encompass approximately 16.5% of the Urbanized Area and account for approximately 4.5% of the population. Although only a relatively small portion of unincorporated Etowah County lies within the MS4 boundary, the majority of Etowah County lies within the Coosa River watershed. The information, resources, minimum control measures, and best management practices developed for the MS4 Storm Water Management Program can be applied to any area within the County and therefore ultimately benefit water quality of the Coosa River.

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

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

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

#### 11.1 Public Education and Outreach

#### 11.1.1 2015 to 2016 Implementation Status

During the April 1, 2015 to March 31, 2016 reporting period, Etowah County completed seven (7) of the seven (7) Public Education and Outreach strategies identified in the previous Annual Report.

A table identifying each Public Education and Outreach strategy planned for the 2015-2016 reporting period, a description of actions taken by Etowah County, and a description of activities planned for the next reporting period is provided in **Appendix J**. Supporting documentation is also included in **Appendix J**.

# 11.1.2 Proposed Activities for the April 1, 2016 to March 31, 2017 Reporting Period

The County will implement the activities listed in the Annual Report for the 2014-2015 reporting period as part of their Public Education and Outreach Program during the 2016-2017 reporting

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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.

#### 11.1.3 Proposed Changes

Etowah County requests no other changes to the Public Education and Outreach strategies identified in the 2012 SWMP or in the Annual Report for the 2014-2015 reporting period.

# 11.1.4 Responsible Party

The Etowah County Engineer's office is responsible for developing, coordinating, overseeing, and tracking the Public Education and Outreach efforts.

#### 11.2 Public Involvement and Participation

### 11.2.1 2015 to 2016 Implementation Status

During the April 1, 2015 to March 31, 2016 reporting period, Etowah County completed six (6) of the six (6) Public Involvement and Participation strategies identified in the previous Annual Report.

Etowah County also completed four (4) strategies beyond those proposed in the previous Annual Report. These strategies included:

- Etowah County partnered with Advanced Disposal had open-top containers at several locations across County (Activity 7)
- Etowah County sponsored a Drug Collection Day (Activity 8)
- Etowah County supported Adopt-A-Mile Program by providing trash bags for cleanup, maintaining the Adopt-A-Mile signs, and disposing of the garbage collected (Activity 9)
- Etowah County utilized County inmates to collect trash along the County highways throughout the year (Activity 10)

A table identifying each Public Involvement and Participation strategy planned for the 2015-2016 reporting period, a description of actions taken by Etowah County, and a description of activities planned for the next reporting period is provided in **Appendix J**. Supporting documentation is also included in **Appendix J**.

# 11.2.2 Proposed Activities for the April 1, 2016 to March 31, 2017 Reporting Period

The County will implement the activities listed in the Annual Report for the 2014-2015 reporting period as part of their Public Involvement and Participation Program during the 2016-2017 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.

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# 11.2.3 Proposed Changes

Etowah County requests no other changes to the Public Involvement and Participation strategies identified in the 2012 SWMP or in the Annual Report for the 2014-2015 reporting period.

# 11.2.4 Responsible Party

The Etowah County Engineers office is responsible for developing, coordinating, overseeing, and tracking the Public Involvement and Participation efforts.

#### 11.3 Illicit Discharge Detection and Elimination

### 11.3.1 2015 to 2016 Implementation Status

During the April 1, 2015 to March 31, 2016 reporting period, the Etowah County completed sixteen (16) of the sixteen (16) Illicit Discharge Detection and Elimination strategies identified in the previous Annual Report.

A table identifying each Illicit Discharge Detection and Elimination strategy planned for the 2015-2016 reporting period, a description of actions taken by the Etowah County, and a description of activities planned for the next reporting period is provided in **Appendix C**. Supporting documentation is also included in **Appendix C**.

# 11.3.2 Proposed Activities for the April 1, 2016 to March 31, 2017 Reporting Period

The County will implement the activities listed in the Annual Report for the 2014-2015 reporting period as part of their Illicit Discharge Detection and Elimination Program during the 2016-2017 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.

# 11.3.3 Proposed Changes

Etowah County requests no changes to the Illicit Discharge Detection and Elimination strategies identified in the 2012 SWMP or in the Annual Report for the 2014-2015 reporting period.

# 11.3.4 Responsible Party

The Etowah County Engineers office is responsible for developing, coordinating, overseeing, and enforcing the IDDE program within the Etowah County regulated MS4 area.

#### 11.4 Construction Site Storm Water Runoff

# 11.4.1 2015 to 2016 Implementation Status

During the April 1, 2015 to March 31, 2016 reporting period, the Etowah County completed five (5) of the five (5) Construction Site Storm Water Runoff strategies identified in the previous Annual Report.

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A table identifying each Construction Site Storm Water Runoff strategy planned for the 2015-2016 reporting period, a description of actions taken by the Etowah County, and a description of activities planned for the next reporting period is provided in **Appendix J**. Supporting documentation is also included in **Appendix J**.

# 11.4.2 Proposed Activities for the April 1, 2016 to March 31, 2017 Reporting Period

The County will implement the activities listed in the Annual Report for the 2014-2015 reporting period as part of their Construction Site Storm Water Runoff Program during the 2016-2017 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.

# 11.4.3 Proposed Changes

The Etowah County requests no changes to the Construction Site Storm Water Runoff strategies identified in the 2012 SWMP or in the Annual Report for the 2014-2015 reporting period.

#### 11.4.4 Responsible Party

The Etowah County Engineer's office is responsible for developing, coordinating, overseeing, and enforcing the construction site storm water program.

# 11.5 Post-Construction Storm Water Management

### 11.5.1 2015 to 2016 Implementation Status

During the April 1, 2015 to March 31, 2016 reporting period, Etowah County met three (3) of the three (3) Post-Construction Storm Water Management strategies identified in the previous Annual Report.

Etowah County also completed three (3) strategies beyond those proposed in the previous Annual Report. These strategies include:

- Etowah County worked to reduce runoff within our right-of way and monitor our areas for erosion using riprap and vegetation (Activity 4)
- Etowah County began work to replace an existing culvert on Gazaway Road and stabilize the banks with rip rap (Activity 5)
- Etowah County replaced a failed cross drain with a larger pipe, lowering the velocity of the discharge and also stabilized the bank with rip rap (Activity 6)

A table identifying each Post-Construction Storm Water Management strategy planned for the 2015-2016 reporting period, a description of actions taken by the Etowah County, and a description of activities planned for the next reporting period is provided in **Appendix J**. Supporting documentation is also included in **Appendix J**.

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# 11.5.2 Proposed Activities for the April 1, 2016 to March 31, 2017 Reporting Period

The County will implement the activities listed in the Annual Report for the 2014-2015 reporting period as part of their Post-Construction Storm Water Management Program during the 2016-2017 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.

#### 11.5.3 Proposed Changes

Etowah County requests no changes to the Post-Construction Storm Water Management strategies identified in the 2012 SWMP or in the Annual Report for the 2014-2015 reporting period.

# 11.5.4 Responsible Party

The Etowah County Engineer's office is responsible for developing, coordinating, overseeing, and enforcing the Post-Construction Storm Water Management program.

#### 11.6 Pollution Prevention and Good Housekeeping for Municipal Operations

#### 11.6.1 2015 to 2016 Implementation Status

During the April 1, 2015 to March 31, 2016 reporting period, Etowah County completed four (4) of the four (4) Pollution Prevention and Good Housekeeping for Municipal Operations strategies identified in the previous Annual Report.

Etowah County also completed nine (9) strategies beyond those proposed in the previous Annual Report. These strategies include:

- Etowah County recycled aluminum cans in the break room at the maintenance shop (Activity 5)
- Etowah County recycled metal from County projects (Activity 6)
- Etowah County collected used oil and filters at the Maintenance Shop (Activity 7)
- Etowah County removed dead animals from the roadside (Activity 8)
- Etowah County partnered with Advanced Disposal had open-top containers at several locations across County (Activity 9)
- Etowah County provided trash bags for cleanup, maintains the Adopt-A-Mile signs, and disposes of the garbage collected. (Activity 10)
- Etowah County cleared and removed trees and brush from drainage ways as needed (Activity 11)
- The County maintained "No Dumping \$500 fine" signs and these No Dumping areas are under video surveillance signs (Activity 12)
- The County utilized County inmates to collect trash along the County highways throughout the year (Activity 13)

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A table identifying each Pollution Prevention and Good Housekeeping for Municipal Operations strategy planned for the 2015-2016 reporting period, a description of actions taken by Etowah County, and a description of activities planned for the next reporting period is provided in **Appendix J**. Supporting documentation is also included in **Appendix J**.

#### 11.6.2 Proposed Activities for the April 1, 2016 to March 31, 2017 Reporting Period

The County will implement the activities listed in the Annual Report for the 2014-2015 reporting period as part of their Pollution Prevention and Good Housekeeping for Municipal Operations Program during the 2016-2017 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.

# 11.6.3 Proposed Changes

The Etowah County requests no changes to the Pollution Prevention and Good Housekeeping for Municipal Operations Program strategies identified in the 2012 SWMP or in the Annual Report for the 2014-2015 reporting period.

#### 11.6.4 Responsible Party

The Etowah County Engineer's office is responsible for developing, coordinating, overseeing, and enforcing the Pollution Prevention and Good Housekeeping for Municipal Operations Program.

### 11.7 Agency Certification

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

I certify under penalty of law that this document and all attachments pertaining to the unincorporated portions of Etowah County were prepared under my directions or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine or imprisonment for knowing violations.

S&ME Project No. 4482-15-042

S&ME Project No. 4482-15-042 March 2016

Signature of Etowah County Responsible Official	Date	
Print Name and Title		

NPDES General Permit ALR040009

# **APPENDIX A – FIGURES**

Figure 1 – Gadsden, Alabama Urbanized Area

Figure 2 – MS4 Monitoring Locations

NPDES General Permit ALR040009

# **APPENDIX B - MS4 MONITORING REPORTS**

2015 Second Quarter Monitoring Report

2015 Third Quarter Monitoring Report

2015 Fourth Quarter Monitoring Report

2016 First Quarter Monitoring Report

NPDES General Permit ALR040009

# APPENDIX C – THE CITY OF GADSDEN

- Table 1. 2015-2016 Public Education and Outreach Strategies
- Table 2. 2015-2016 Public Involvement/Participation Strategies
- Table 3. 2015-2016 Illicit Discharge Detection and Elimination Strategies
- Table 4. 2015-2016 Construction Site Storm Water Runoff Control Strategies
- Table 5. 2015-2016 Post-Construction Storm Water Management Strategies
- Table 6. 2015-2016 Pollution Prevention/Good Housekeeping for Municipal Operations

NPDES General Permit ALR040009

# APPENDIX D – RAINBOW CITY

Not included in this Report

NPDES General Permit ALR040009

# APPENDIX E – REECE CITY

**Terminated From Permit** 

NPDES General Permit ALR040009

# APPENDIX F - CITY OF SOUTHSIDE

- Table 1. 2015-2016 Public Education and Outreach Strategies
- Table 2. 2015-2016 Public Involvement/Participation Strategies
- Table 3. 2015-2016 Illicit Discharge Detection and Elimination Strategies
- Table 4. 2015-2016 Construction Site Storm Water Runoff Control Strategies
- Table 5. 2015-2016 Post-Construction Storm Water Management Strategies
- Table 6. 2015-2016 Pollution Prevention/Good Housekeeping for Municipal Operations

NPDES General Permit ALR040009

# APPENDIX G - CITY OF GLENCOE

- Table 1. 2015-2016 Public Education and Outreach Strategies
- Table 2. 2015-2016 Public Involvement/Participation Strategies
- Table 3. 2015-2016 Illicit Discharge Detection and Elimination Strategies
- Table 4. 2015-2016 Construction Site Storm Water Runoff Control Strategies
- Table 5. 2015-2016 Post-Construction Storm Water Management Strategies
- Table 6. 2015-2016 Pollution Prevention/Good Housekeeping for Municipal Operations

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# **APPENDIX H – HOKES BLUFF**

- Table 1. 2015-2016 Public Education and Outreach Strategies
- Table 2. 2015-2016 Public Involvement/Participation Strategies
- Table 3. 2015-2016 Illicit Discharge Detection and Elimination Strategies
- Table 4. 2015-2016 Construction Site Storm Water Runoff Control Strategies
- Table 5. 2015-2016 Post-Construction Storm Water Management Strategies
- Table 6. 2015-2016 Pollution Prevention/Good Housekeeping for Municipal Operations

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# **APPENDIX I – CITY OF ATTALLA**

- Table 1. 2015-2016 Public Education and Outreach Strategies
- Table 2. 2015-2016 Public Involvement/Participation Strategies
- Table 3. 2015-2016 Illicit Discharge Detection and Elimination Strategies
- Table 4. 2015-2016 Construction Site Storm Water Runoff Control Strategies
- Table 5. 2015-2016 Post-Construction Storm Water Management Strategies
- Table 6. 2015-2016 Pollution Prevention/Good Housekeeping for Municipal Operations

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# **APPENDIX J – ETOWAH COUNTY**

- Table 1. 2015-2016 Public Education and Outreach Strategies
- Table 2. 2015-2016 Public Involvement/Participation Strategies
- Table 3. 2015-2016 Illicit Discharge Detection and Elimination Strategies
- Table 4. 2015-2016 Construction Site Storm Water Runoff Control Strategies
- Table 5. 2015-2016 Post-Construction Storm Water Management Strategies
- Table 6. 2015-2016 Pollution Prevention/Good Housekeeping for Municipal Operations