STORM WATER MANAGEMENT PROGRAM PLAN



December 2015

SIGNATORY AND CERTIFICATION REQUIREMENTS

NPDES MS4 PERMIT

FOR

CITY OF PRICHARD

PRICHARD, AL

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate 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 fines and imprisonment for knowing violations.

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1.0 INTRODUCTION

1.1 Regulatory Overview

The Stormwater Management Program (SWMP) Plan includes pollution prevention measures, Stormwater monitoring, use of legal authority, and other appropriate means to control the quality of discharge from the City of Prichard (City) Separate Storm Sewer System (MS4), in accordance with the National Pollutant Discharge Elimination System (NPDES) Permit number ALS000002. The SWMP is implemented in accordance with Section 402(p) (3) (B) of the Clean Water Act, and the Stormwater Regulations at 40 CFR Part 122.26.

It is the goal of the SWMP to reduce the discharge of pollutants to and from the MS4 to the maximum extent practical (MEP), thus protecting the quality of water in the receiving water bodies. This stormwater Management Program covers the term of the permit and is updated as necessary, or required by the Alabama Department of Environmental Management (ADEM) to ensure compliance with the statutory requirements of the Clean Water Act.

Per the NPDES Permit number ALS000002 requirements, BMPs and measureable goals are provided in 3-10 for each program element listed below:

- Storm Water Collection Systems Operations
- Public Education and Public Involvement
- Illicit Discharge Detection and Elimination
- Construction Site Storm Water Runoff Control
- Post-Construction Storm Water Management In New Developments and Re-Development
- Spill Prevention and Response
- Pollution Prevention/Good Housekeeping
- Wet-Weather Monitoring

ADEM defines the fiscal year as December 1 to November 30. ADEM and the City have agreed to a schedule for measurable goals as outlined in the following sections. Year one (1) indicates the period from December to November 2015. For year one (1) milestones which include specified frequencies, the City shall begin meeting the required frequencies in May 2014.

1.2 MS4 Jurisdictional Boundary

The City of Prichard occupies approximately 25.5 square miles. Municipalities adjacent to the City include Eight Mile to the east, the City of Chickasaw to the west, the City of Saraland to the north, and the City of Mobile to the South. The City's MS4 boundary includes parts of eight watersheds: Hogs Bayou Creek, Chickasaw Creek, Eight Mile Creek, Gum Tree Branch, Toulmin's Spring Branch, inflow Chickasaw Creek, and Seabury Creek.

The City's MS4 boundary encompasses Chickasaw Creek and Toulmin's Spring Branch and Three Mile Creek.

Measureable Goals:

• In one year we will prepare new maps to comply with our MS4 permit.

2.0 PROGRAM MANAGEMENT

2.1 Permittee Responsibilities

The City of Prichard is the designated permittee for the City of Prichard's MS4. The Stormwater Management Program is administered by the Inspection Department. However, other City departments are involved with the day-to-day responsibilities of implementing the stormwater program. The Departments work together to perform the stormwater responsibilities as described on the following page.

An organizational chart showing City Departments as they relate to the Stormwater Management Program can be found within.

2.2 Funding Sources

Implementation of the SWMP is funded from the City's General Fund using the budgets of Inspection Services, and fees collected for the City through the Prichard Water and Sewer Board

2.3 Legal Authority and Enforcement

The City of Prichard is required to ensure legal authority exists, to the maximum extent possible, to control discharges to and from the MS4 area. The City of Prichard enforces Ordinance 1712 for Trash and Litter. This ordinance addresses garbage, trash and litter on all properties within the City limits.

Ordinance #1952 – An Ordinance to protect, maintain, and enhance the environment of the City of Prichard by controlling the following:

- Filling, grading, dredging and other other land disturbances which may increase erosion
- Establish a permit process and required erosion control methods for land disturbance in the City of Prichard.
- Maintain and enhance community waters into which storm water outfalls flow, including, but not limited to, lakes, rivers, streams, ponds, wetlands, sinkholes, and groundwater in the City of Prichard.

Ordinance #1538 – addresses that whenever any officer of the Inspection Department of the City of Prichard shall discover on any premises in the City of Prichard any growth of weeds in violation of Section 2 of this ordinance, he shall notify the owner or the person having said premises in charge by certified mail, return receipt requested. Refusal to accept delivery of said notice is tantamount to receipt. Thereupon, said person may have no less than ten (10) days within which to correct said violation.

Section 9. For any violation of any section or provision of this ordinance, the Municipal Judge shall impose the following penalties:

- For lots of one (1) acre or less, a fine of not less than \$25 nor more than \$500 or imprisonment not to exceed six (6) months, or both.
- For lots greater than one (1) acre, but not greater than three (3) acres, a fine of not less than \$50 nor more than \$500 or imprisonment not to exceed six (6) months or both.

The City of Prichard is currently drafting a Stormwater Pollution Prevention and Management Ordinance.

The City does not have authority over sanitary sewer collection system. However, The City works closely with the Prichard Water and Sewer, Board of Water and Sewer Commissioners and other utilities to minimize the impacts from any infiltration, inflow, sewer breaks or other problems.

DEPARTMENT	RESPONSIBILITIES
Inspection	Program Administration
	Collect and Maintain MS4 related documentation
	• Spills Management and reporting
	Environmental Training
	Public Involvement
Public Works Department	Streets sweeping
	Catch basins cleaning/maintenance
	Storm drain cleaning
	Liter trap cleaning/maintenance
	Concrete street/sidewalk repair
	Asphalt road maintenance
	Dirt & Gravel road maintenance
	Public structural control maintenance
	 Trash removal from receptacles (at public locations other than parks)
	 Waste collection from street and public lot cleaning
	 Right of way drainage ditch maintenance and inspections
	Drainage infrastructure repairs and inspections
Fire Department	Spills management and reporting
Environmental	Enforcement of litter Ordinance
MS4 Contractor	Stormwater Management Consultant
	Conduct Wet Weather Monitoring
	 Perform Illicit Discharge Detection and Elimation Screening
	Prepare Annual Report

3.0 STORM WATER COLLECTION SYSTEMS OPERATIONS

3.1 Structural Controls

The structural controls that are owned, operated, and maintained by the City are inspected on a semi-weekly basis by the City Inspector for the City of Prichard. Standard operating and maintenance procedures are utilized to minimize the potential impact from the maintenance practices. Maintenance activities including stabilization and re-vegetation are performed by Public Works. Litter, floatables and other debris is removed by Public Works (Rebel Road). The amount of litter and debris and trash, is tracked by Public Works. A map indicating City-owned/operated structural controls can be found in Appendix A. Standard Operating Procedures for inspection can be found in Appendix C.

Measureable Goals:

• For years (1) through five (5) the City will perform annual inspection and maintenance of City-owned/operated structural controls.

Responsible Departments: Public Works, Inspection Department

Within 365 days of the effective date of the permit, the City will pass an ordinance to
provide authority over private structural controls resulting from qualifying new
construction, new development, or re-development. The construction or development
project is deemed "qualifying" if the land disturbance covers one or more acres or
disturbs less than one acre but is part of a larger common plan of development or sale
that would disturb one or more acres.

3.2 Catch Basins

The City currently maintains 6700 catch basins which are mapped and shown on Map of Catch Basins in Appendix A. The catch basins have been placed on a annual year schedule for inspection/cleaning. The cleaning zones for inspection/cleaning. Catch basins are also cleaned based upon citizen's complaints by phone. Floatables and other debris is removed when identified. The amount of litter and debris is recorded by the Public Works Department. A copy of the Inspection form can be found within Appendix D.

Measurable Goals:

- For years one (1) through five (5), continue inspection/cleaning of at least 5% of the catch basins annually following the established schedule/zones.
- For years one (1) through five (5) the Map of Catch Basins will be updated as new catch basins are installed and identified.

Responsible Department: Inspection

3.3 Litter Boom

The City currently maintains one litter boom located on Martin Luther King Avenue off Three Mile Creek in Appendix A. The Public Works Department inspects the litter boom on a weekly basis, at a minimum, and after a 0.75 inch rainfall. A litter boom Inspection Form is utilized to ensure accuracy and consistency of information received. Litter, floatables and other debris are removed when the traps contains floatables, debris, trash, etc. A copy of the Inspection Form can be found within Appendix D.

Measureable Goals:

• For years one (1) through five (5), continue inspection/maintenance of the litter boom(s) on a weekly basis and immediately following a significant rainfall event (0.75 inch or more).

Responsible Department: Public Works

• For year one (1), the City will consider the purchase of a second litter boom.

Responsible Departments: Public Works, Inspection

4.0 PUBLIC EDUCATON AND PUBLIC INVOLVEMENT

4.1 Introduction

Public education and outreach is a very important element of the City's stormwater program. Increasing public awareness of stormwater pollution concerns and prevention ultimately serves to reduce the contribution of pollutants in stormwater runoff. The City will also be involved with the public to carry out group activities that focus on storm water pollution control and to volunteer community actions to restore and protect local water resources, and seek public input on the SWMP.

4.2 Education Activities

4.2.1 Target Pollutants and Sources

The City will focus educational material on non-point source pollutants typically found in stormwater. These pollutants include, but are not limited to trash, sediment, pathogens, oils, greases, fertilizers and pesticides. The sources that are targeted include, but are not limited to, littering, illegal dumping, and construction site runoff, impacts from development, failing septic systems, home auto repair, and improper application of fertilizers, pesticides, and herbicides.

Methods to use to disseminate education and outreach messages will include, but are not limited to, the following:

- Social Media;
- Public events;
- News releases;
- Brochure distribution at City Buildings.

4.2.1.1 Reduction of Litter, Floatables, and Debris

The Offices of the Mayor, the Inspection Department, and the Director of Public Works will work closely together to ensure that the City will continue to comply with issues of stormwater, blight and litter control.

On a annual basis the Inspection Department will show some educational videos to our Public Works department personnel and to present local seminars for the general public. The City has recently applied for a federal grant in the amount of \$36,000.00 which will educate the general public on "Community Greening and Green Infrastructure.

The program objective will be Eight Mile Creek and Gum Tree Branch which are located in Mobile County, with a majority of its 37 square mile watershed located within the cities of Mobile, Prichard, and Chickasaw. The City limits of Prichard, AL contain five miles of impaired streams comprising components of the semi-braided, perennial Eight Mile Creek and larger Chickasaw Creek tributary system which flow into Mobile River and eventually into Mobile Bay and the Gulf of Mexico.

The projected award date will be August 2, 2016. One of the main objectives of the project will be to develop a comprehensive environmental plan and to facilitate neighborhood discussions/workshops to design a community green infrastructure plan.

Measurable Goals:

- For year one (1), the City will participate in workshops and in-house storm water presentations for City employees
- For years one (1) through five (5), implement on at least a quarterly basis, will provide general education on the impacts litter has on water bodies and ways to reduce litter.
- For years one (1) through five (5) continue educating the public on storm water issues and related education on pollution control and enforcement of complaints of areas which have a high rate of dumping and trash concerns.
- •

Responsible Departments: Public Works, Community Development, Inspection

4.2.2 Educating the General Public

The City is currently developing a Storm Water Ordinance to disseminate information concerning ways to enforce and reduce stormwater pollution.

The City will continue the development and distribution of brochures and or letters and coloring books which have BMP's to convey various stormwater educational messages that can be used to reduce stormwater pollution, such as those listed on the following page. The quantity of each brochure provided will be reported in the Annual Report.

The Inspection Department and Community Development participates in various meetings and community events with Mobile Bay Euastary at least two or three times per month. These meetings are for Community Action Groups "Perk" and Parent/Teacher Associations. These events provide an excellent educational opportunity by providing public access to informational materials and personnel with respect to the full range of City Environmental regulations and programs. Information may be provided regarding erosion control, sedimentation and other City environmental programs. Any event that the City participates in will be described in the Annual Report.

	LETTER	TITLE	LOCATIONS	TARGET AUDIENCE
1	Stormwater Management	for Vehicles	City Hall	Businesses;
2	Construction & Repair	Building Repair	City Hall	Businesses;
3	Maintenance	BMP's	City Hall	Business/employees
4	EPA Handout	Facility Guidelines	Local industry/facilities	Businesses/Industrial
5	Letter	Washing/steam cleaning	City Hall	Businesses <u>; Public</u>

Storm Water Management Plan – City of Prichard 2015

Public education Brochure and Handouts

Educational materials and outreach events are documented and examples of the educational materials are included in the Annual Report.

Measureable Goals:

- For year one (1), the City will identify, or prepare, and distribute brochures and/or letters to the general public for BMP's and litter control methods to local contractors, and developers.
- For years one (1) through five (5), the City will continue educating the general public and children on the importance of stormwater pollution prevention.

Responsible Department: Inspection

4.23 Educating Businesses

The City will continue to produce and mail to local businesses concerning topics such as management of food service establishments, use and storage of cleaning supplies, carwash soaps, and other hazardous materials and impacts of illicit discharges and how to report them. These topics are covered in our Stormwater letters and/or brochures listed in Section 4.2.2 table.

Business can be a high contributor to illicit discharges. The City has letters that are mailed out annually to suggest implementing BMPs and training on BMPs, good housekeeping and spill response.

Mobile County Health Department handles the permitting, inspection, and educational material for industries such as food establishments, hotels/motels, and daycares.

Measurable Goals:

• For year one (1), the City will continue to mail educational information listed above.

Responsible Departments: Inspection

4.2.4 Educating Homeowners Landscapers, Property Managers

The City will continue to have workshops and seminars on stormwater prevention and control measures.

Measurable Goals:

• For one (1) year the City will continue to prepare brochures on stormwater maintenance for Homeowners, Landscapers, and Property Managers

Responsible Department: Inspection

4.2.5 Educating Engineers, Contractors, and Developers

Engineers, Contractors, and Developers will be issued a handout for educational material to address: Impacts of increased storm water flows into receiving bodies; and Run-off reduction techniques that may include, but not limited to, site design, pervious pavement, alternate parking lot design, and flow control BMP's.

A copy of <u>Controlling Erosion and Sediment in Home Building</u> will be available for contractors and developers at the City of Prichard Inspection Department.

In addition a copy of <u>The Alabama Handbook for Erosion Control, Sediment Control and</u> <u>Stormwater Management on Construction and Urban Areas</u> will be also in the Inspection Department, City Hall.

Measurable Goals:

- For year one (1) The City will provide educational handouts and books to address: Impacts of increased storm water flows into receiving water bodies; and Run-off reduction techniques that may include, but not limited to, site design, pervious pavement, alternative parking lot design, retention of forests and mature trees to assist in stormwater treatment and flow control BMPs.
- For year one (1) the City will have available a copy of <u>Alabama Handbook for Erosion</u> <u>Control, Sediment Control, and Stormwater Management on Construction Sites and</u> <u>Urban Areas.</u>

Responsible Department: Inspection Department

4.26 Effectiveness of Public Education

The City will assess the interest in public education by tracking by a sign in sheet the number of hard copy handouts are signed in the Inspection Department.

The City recognizes that adjustments are necessary across multiple departments along with the court system in order to deter littering and other issues involved with abandoned or neglected properties. The City believes that the Public Education program is effective and intends to make a significant effort toward the litter problems in the City of Prichard.

The City will seek and consider public input in the revision and implementation of this SWMP Plan through a public hearing. Comments will be noted by the Council's secretary and forwarded to the Inspection Department.

The Mobile Bay National Estuary Program (MBNEP) is a voluntary, non-regulatory program. It stimulates a public approach to watershed management, and promotes a team approach to

address common environmental issues. The City will continue to support (MBNEP) and continue to invite this group for workshops and seminars for the City of Prichard. The City will continue efforts regionally through involvement with organizations such as MBNEP.

4.3.2 Cleanup Events

Each year the City will organize and participate in a minimum of one (1) cleanup event focus on litter, floatables, and debris from area waterways. The waterbodies identified for such an event based on citizen feedback include but are not limited to the following waterways (not listed by priority): Hogs Bayou Creek, Chickasaw Creek, Eight Mile Creek, Gum Tree Branch, Toulmins Spring Branch, Seabury Creek. For the waterbodies identified, the City must consider access and safety concerns for citizens, parking availability, and space for disposal trucks/containers. City employees and equipment may be utilized within the waterway before, during, or after the volunteer cleanup effort.

The City also promotes cleanup through PERK and Adopt-A-Block programs.

Measureable Goals:

- For year one (1), the City will post the current SWMP Plan and provide an email address for review comments.
- For year one (1) the City will utilize grant funding for our SWMP.
- For years one (1) through five (5), continue to organize and participate in at least one (1) area cleanup activity per year focused on the removal of liter, floatables, and debris from waterways.
- For year two (2) The City Council members may conduct a City-wide cleanup in their community
- For years one (1) through five (5), the City will continue to partner with organizations such as PERK and Adopt-A-Block as long as the organizations is beneficial to reaching NPDES compliance.

Responsible Department: Public Works, Inspection

5.0 ILLICIT DISCHARGE DETECTION AND ELIMINATION

5.1 Introduction

Non-stormwater discharges to the MS4 shall be effectively prohibited. ADEM provides exceptions for the following non-stormwater discharges, since they are not considered to be significant sources of pollution:

- Water line flushing
- Landscape irrigation (not consisting of treated or untreated wastewater unless authorized by ADEM)
- Diverted stream flows
- Uncontaminated ground water infiltration
- Uncontaminated pumped groundwater
- Discharges from potable water sources
- Foundation and footing drains
- Air Conditioning drains
- Irrigation water (not consisting of treated or untreated wastewater unless authorized by ADEM)
- Rising ground water
- Springs
- Water from crawl space pumps
- Lawn watering runoff
- Individual residential car washing to include charitable carwashes
- Residual street wash water
- Discharge or flows from firefighting activities (including fire hydrant flushing)
- Flows from riparian habitats and wetlands
- Dechlorinated swimming pool discharges

Any discharge to a municipal separate storm sewer that is not composed entirely of storm water except discharges pursuant to a NPDES permit is referred is referred to as an "illicit discharge". The City's current stormwater ordinance prohibits illicit discharges to waters of the State (through MS4). The Stormwater Pollution Prevention and Management Ordinance (draft included in SWMMP) prohibits illicit discharges to waters of the state (through the MS4). The City's Ordinance still in draft form.

Measureable Goals:

• For year one (1), the City will adopt a Stormwater Pollution Prevention and Management Ordinance to strengthen its legal authority for requiring removal of any confirmed illicit discharge. This ordinance will be available in the Inspection Department.

Responsible Departments: Legal, Inspection, MS4 contractor

5.2 Program to Locate Illicit Discharges and Improper Disposal into the MS4

5.2.1 Dry Weather Screening

The City conducts dry weather screening to detect and eliminate illicit discharges to the City's MS4. The City is currently adopting a Stormwater Pollution Prevention Management Ordinance which will be utilized for procedures in this effort. The screenings are conducted throughout the permitted area but are focused on the City's approximately 500 major outfalls. A map showing all the known major outfalls is provided in Appendix A. These outfalls have been placed on a 5-year schedule for inspection/screening. The screening zones with schedule for the next five years are shown on the Dry Weather Field Screening Map in Appendix A. In addition to dry weather screening, outfalls are inspected when a suspected illicit discharge is reported by a citizen or City employee via the City of Prichard's Mayor's office or Environmental Department. A summary of the results of the screening are found in the Annual Report.

There are some areas within the incorporated portions of the City that are not served by sanitary sewer systems and as a result, utilize individual septic systems. The Mobile County Health Department – Environmental Health Services reviews applications and plans for septic systems, conducts installation inspections and responds to reports of septic system malfunctions and releases, some of which may impact the MS4. The City will request input from Mobile County Health Department to compile and maintain an inventory and map of septic systems. Dry weather screenings of outfalls and drainage ditches is an important tool in identifying seepage or illicit inflows from sanitary sewer lines or septic systems.

Measureable Goals:

- For year (1), the City will revise if necessary our Stormwater Pollution Management Ordinance to be more specific
- For year (1), the City will train personnel performing illicit discharge screening
- For year (1), the City will provide a map of structural BMPs owned, operated, or maintained by the Permittee.
- For years one (1) through five (5), continue dry weather screening of approximately 20% of major outfalls annually with all (100%) of major outfalls screened at least once every five years. Those outfalls deemed of highest risk for illicit discharges will be screened semi-annually with an effort to screen during normal business hours.
- For years one (1) through five (5), implement our Storm Water Pollution Management Ordinance.
- For years one (1), through five (5) the City will request to input from Mobile County Health Department to compile an inventory map of septic systems within the MS4 area. The City will attempt to collect inspection records of the septic systems and perform field screening in areas with a high density of septic systems.

Responsible Departments: Inspection Department, Environmental Department

5.2.2 Municipal Enforcement Patrolling

The City's Environmental Department performs regular inspections for violations of the litter ordinance. Identified parties responsible for illicit discharges or litter violations are issued a Notice of Violation and given a reasonable amount of time to correct the condition(s). If compliance is not achieved by a subsequent amount of time, a Municipal Offense Ticket is issued. SOPs for patrolling, Response to illegal Dump, and Response to Illicit Discharge are provided in Appendix C.

Measureable Goals:

- For years one (1), the City will attempt to follow through with increased enforcement of public education in areas where there is a high frequency of illicit discharges.
- For years one (1) through five (5), continue performing Environmental Enforcement of the litter ordinance and illicit discharge reporting will be tracked and summarized in the Annual Report

Responsible Departments: Environmental Department

5.2.3 Sanitary Sewage Overflows (SSO)

The City does not have authority over the sanitary sewer collection system. However, the City works closely with the Prichard Water and Sewer System to minimize impacts from any infiltration, inflow, sewer breaks, or other problems. Prichard Water and Sewer provide notification via fax or email to Inspection Department MS4 coordinator within 24 hours of a sanitary sewer discharge or storm water inflow. The Environmental Department investigates any sanitary discharge location within 10 days of the incident to confirm corrective action has been completed. This information is documented on the Inspection Form found in Appendix D.

Measureable Goals:

• For years one (1) through five (5), continue communication with Prichard Water and Sewer and follow up inspection of SSOs. Provide a tracking summary of SSOs in the Annual Report.

Responsible Departments: Inspection Department

5.2.5 IDDE Awareness Training

Departments such as Public Works, Inspection, and Environmental conduct work or inspections throughout the MS4 area, Personnel in these departments should be trained on how to detect a suspected illicit discharge and encouraged to report such findings to Inspection Departments or the Mayor's Office and will be conducted at least once per permit cycle.

Measurable Goals:

• For years (1) through five (5), conducting training of Public Works crews, Environmental inspectors. New employees assigned to these duties will receive IDDE Awareness

training within six (6) months of employment or as determined by the Department of which the employee is assigned.

Responsible Departments: Inspection; Environmental Department

5.2.6 Public Reporting of Illicit Discharges

In the event an illicit discharge is detected by the general public, the citizen should report the illicit discharge to the City of Prichard Mayor's Office or Environmental Department by phone or Email submission. Following receipt of the information from sources, the compliant will be routed immediately to the Environmental Department for investigation and enforcement. SOPs for responding to a call dispatch are provided in Appendix C. Environmental track the illicit discharge reporting and enforcement.

If the reported illicit discharge is validated and suspected to be intermittent or continuous, Environmental and MS4 Contractor is dispatched to investigate and sample following the Storm Water Pollution Management Ordinance.

Measureable Goals:

- For years one (1) through five (5) maintain reports of illicit discharges and consider public education.
- For years one (1) through five (5), evaluate effectiveness of public reporting and public education by comparing the statistics to prior years.

Responsible Departments: Inspection, MS4 Contractor, Environmental Department

5.3 Enforcement

Enforcement procedures associated with illicit discharges witnessed by City staff with be enforced by the Inspection Department and Environmental.

Measurable Goals:

- For year one (1), the City will review procedures with personnel responsible for illicit discharge
- For years one (1) through five (5) implement the Stormwater Pollution Management Ordinance and track enforcement measures.
- For year two (2) the City will evaluate the Litter Ordinance to reflect the revised stormwater ordinance.

Responsible Departments: Inspection Department, Environmental

6.0 CONSTRUCTION SITE RUNOFF CONTROL

6.1 Introduction

The permit requires a program to reduce the discharge of pollutants from construction sites. This is achieved through education of contractors, engineers and construction companies, site inspections, and plan review.

The Stormwater Pollution Management Ordinance addresses construction site runoff and can be found in the Inspection Department, City Clerk's Office.

6.2 Site Plan Review

Developers must obtain a Land Disturbance Permit from the Inspection Department for all residential sites that that disturbs less than 10,000 square feet or (0.23 acres). Currently, the following MS4-related criteria are met prior to issuance of the Land Disturbance Permit:

- 1. Developer may request an optional Pre-Development Meeting with City Inspector
- 2. Developer (if required under the current Land Disturbance Ordinance No. 1952) submits documents for a Land Disturbance Permit as required by our Land Disturbance Permit Checklist. These documents include but are not limited to the following:
 - a. The developer note whether a Notice of Intent (for sites at least 1 acre in size or sites less than one acre but part of a larger common plan/development/sale) has been submitted to ADEM on the land Disturbance Checklist Form.
 - b. Developer agrees to maintain BMPs including structural control throughout the life of the project. If there is a structural control on the site, the maintenance plan is signed.
 - c. Developer agrees to submit as-built drawings if there are significant changes from the design plans and the engineer agrees to submit a new plan if changes are made.
 - d. Developer agrees to notify City of project startup.
- 3. Our City Engineer consultant performs a pre-development plan review
- 4. Our City Engineer consultant provides a letter of approval or denial to the City Clerk's office and Inspection Departments

The City participates with the Alabama Branch of the Associated General Contractors, and Home Builders Association of Alabama, the South Alabama Regional Planning Commission, League of Municipalities, and the Mobile Bay National Estuary Program to proliferate the use of BMPs.

The Use of BMPs is encouraged regardless of the project size. Letters are generated periodically from the City to design professionals reminding them of their responsibilities toward planning and implementation of construction BMPs and design requirements.

Measureable Goals:

- For year one (1) the City will revise the Land Disturbance Permit Certification as it relates to qualifying construction sites, to document that the post-construction site conditions are designed to provide runoff that mimics the pre-development hydrology for a 1.2 inch rainfall over a 24 hour period preceded by a 72-hour antecedent period.
- For year one (1), revise the Land Disturbance Permit checklist as it relates to qualifying construction sites.
- For year one (1) revise the Land Disturbance Permit Review Checklist to incorporate new requirements described in previous measurable goals.
- For years (1) through five (5) the City will provide educational materials and resources related to the application and maintenance of erosion and sediment controls on its website.

Responsible Department: Inspection, Engineer Consultant, MS4 Contractor

6.3 Construction Site Inspection

The City Inspection staff inspects all qualifying construction sites annually to ensure that BMPs are being implemented correctly and are maintained properly. Priority construction sites and other qualifying construction sites determined by the City or ADEM to be a significant threat to water quality are inspected monthly, at a minimum. A copy of the construction checklist is provided in Appendix D. The City Inspection Department tracks these construction site inspections and is responsible for enforcement by issuing the verbal warnings, Notice of Violations, and Municipal Offense Tickets. Tracking of the Municipal Ticket through Municipal Court is accomplished through the Environmental Department.

Construction site inspections are also conducted following a complaint filed by a citizen through the Mayor's office, emails, and by phone calls. The same construction site inspection form enforcement and tracking mechanisms apply to these inspections.

Construction site inspection personnel will be trained by completing ADEM's Qualified Credential Inspector (QCI) training. The QCI program provides training in the requirements of the Alabama NPDES rules, ADEM's construction stormwater management program, evaluation sites to ensure that BMPs are effectively implemented and maintained, and evaluation of conveyance structures, receiving waters and adjacent impacted offsite areas to ensure the protection of water quality. Initial QCI training and annual refresher certificates will be maintained by Inspection Department for the Annual Report.

Measureable Goals:

For year one (1) The City will revise the Construction Site Inspection Checklist. The revisions will include but are not limited to the following:
 0 Requirements for construction site operators to control waste – specifically add discarded materials, concrete truck washout, chemicals, and sanitary waste.

- For years one (1) through five (5), the City will continue to require members of staff involved in construction site inspections to be QCI trained.
- For years one (1) through five (5) the City will perform construction site inspections following the criteria described above.

Responsible Department – MS4 Engineer, Inspection

6.4 Stormwater Pollution Management Ordinance for Construction Site Violation

When City staff identifies insufficient BMPs, the staff initiates communications with the contractor to improve BMP controls. If during an inspection a minor violation is identified that could immediately be remedied, the inspector will either issue his/her discretion a verbal warning of Notice of Violation. If a verbal warning. If a verbal warning is issued, the corrective action must take place immediately. When a serious violation as outlined in the Stormwater Pollution Management Plan is identified that requires a corrective action that cannot be remedied immediately, a Notice of Violation will be issued and corrective action must take place before the deadline stated in the Notice of Violation. If noncompliance continues, a Municipal Offense Ticket is issued.

If numerous Notice of Violations or Municipal Offense Tickets are accumulated during the project or if corrective action is not completed within the allotted period of time, a Stop Work Order may be issued with a formal report being issued to ADEM concerning the permit violation. Tracking of all enforcement activities will be the responsibility of the Inspection Department.

Measurable Goals:

- For year one (1) the City will create and thereafter implement a Construction Site Enforcement Response Plan. This plan will provide a written procedure for issuing verbal warnings, Notice of Violations, Municipal Offense Tickets, Stop Work Orders resulting from regularly scheduled inspections or inspections email or phone call from citizens.
- For years two (2) through five (5), the City will implement the Construction Site Plan.

Responsible Department: Inspection

7.0 POST-CONSTRUCTION RUNOFF CONTROL

7.1 Requirements and Standards

Following construction completion, the City is currently developing post-construction standards to be required and enforced at all qualifying sites. These standards will be used for all approved land disturbance permits dated after the effective date of the Stormwater Pollution Management Plan Ordinance. Post-construction BMPs must be designed and constructed to provide runoff that mimics the pre-development hydrology for, a minimum 1.14 inch rainfall over a 24 hour period preceded by 1 72-hour antecedent dry period.

Measurable Goals:

- Within 730 days of the effective date of the permit, the City will develop and implement a program to address post-construction storm water runoff from the MS4 from new development and re-development.
- The City will develop a checklist to require developers of qualifying construction and/or new development sites to maintain post-construction structural and non-structural BMPs until the maintenance responsibility is legally transferred to another party.
- For year one (1), the City will consider implementing a requirement for developers to record maintenance of structural controls on deeds (in addition to having the maintenance plans signed and notarized) for qualifying construction sites.
- Within 730 days of the effective date of the permit, the City will revise the Stormwater Pollution Management Ordinance to require landowners to maintain post-construction structural and non-structural BMPs for all qualifying construction or new development/redevelopment sites. This requirement will not be applicable to sites with approved land disturbance permits dated prior to the effective date of the Stormwater Pollution Management Plan Ordinance.
- The Stormwater Pollution Management Ordinance will be available in the City Clerk's Office.
- Within 730 days of the effective date of the permit, the City will prepare a written Postconstruction Enforcement Response Plan.
- For years one (1) through five (5), the City will update an inventory of post-construction structural controls for which the City has responsibility. For years one (1), the City anticipates that only City owned or operated structural controls will fall under its responsibility.
- Within 730 days of the effective date of the permit, the City will identify LID/green infrastructure resources that may have brochures or pamphlets that will be given to the public to encourage the use of LID/green infrastructure.
- For years two (2) through five (5), the City will develop LID/green infrastructure standards and update the Land Disturbance Permit process and review process accordingly.

Responsible Department: Inspection, Legal

7.2 Post-Construction Inspections

The City is currently developing a program for performing post-construction inspections on all qualifying sites with approved land disturbance permits dated after the effective date of the Stormwater Pollution Management Ordinance. Post construction site inspections will be performed to identify site conditions including BMP condition, along with other site characteristics indicating whether site maintenance is required. Post-construction inspections will be required of qualifying construction and new development/redevelopment sites. Structural and non-structural controls will require annual inspections. Annual inspection documentation will be required.

Measurable Goals:

 Within 730 days the effective date of the permit, the City will create and begin implementing a post construction inspection check list for qualifying construction and/or new development/re-development sites. The City must determine whether the inspections will be conducted by Inspection staff or a QCI or similar at the landowner's expense. These annual inspections will be tracked and landowners with deficiencies will be mailed a Notice of Violation letter with details of required improvements and schedule. Noncompliance will result in a Municipal Offense Ticket which will be processed through Municipal Court.

Responsible Department: Inspection, MS4 contractor

8.0 POLLUTION PREVENTION/GOOD HOUSEKEEPING

8.1 Introduction

The NPDES Permit requires the City to develop, implement, and maintain a program that will prevent or reduce the discharge of pollutants in storm water run-off from municipal operations to the maximum extent practicable. The City will develop strategies for the implementation of BMPs that result in pollution prevention and also utilize good housekeeping measures in its municipal facilities. Each topic is as discussed below:

Pollution prevention includes measures that involve roadways, rights-of-way, and stormwater management systems.

8.2.1 Street Sweeping

The City typically operates a street sweeper on a daily basis, weather permitting. All public; paved, paved streets are sweet annually, at a minimum, by Public Works staff. A SOP for Street Sweeping is provided in Appendix C. Public Works staff track the streets swept and quantity of sediment removed and forward that information to Inspection Department for the Annual Report.

Measureable Goals:

• For years one (1) through five (5), the City will sweep all public, paved streets and track/report sediment removed in the Annual Report.

Responsible Department: Public Works

8.2.2 Vegetation Control

The City is responsible for maintaining vegetation within right-of-way ditches, medians along public roads, and the grounds of municipal facilities. The Parks and Recreation Department is responsible for landscape maintenance at public parks and cutting the majority of right-of-way ditches and grounds keeping at other facilities, the Golf Course staff maintains the golf course, and Public Works is responsible for cutting and maintaining major ditches and major maintenance of right-of-way ditches. Parks and Recreation and Public Works do not have equipment capable of collecting grass clippings through personnel are trained to direct clippings away from roads and stormwater inlets. A Vegetation Control SOP is provided in Appendix C. Some parks have areas of alternative ground cover which do not require frequent mowing. Right of way ditches are sprayed with herbicides to control vegetation.

Measureable Goals:

• For years one (1) the City will evaluate cost-effective methods for advancing the Vegetation Control SOP.

Responsible Department: Public Works, Golf Course, Parks and Recreation

8.2.3 Litter Removal

The City shall maintain it streets and right-of-ways in a manner to minimize discharge of pollutants. The City currently relies on inmates from local correction facilities and persons fulfilling community service hours under the supervision of Parks and Recreation staff, along with Public Works light duty personnel to remove litter from right-of-ways. The City relies on persons fulfilling community services hours under the supervision of Parks and Recreation staff, along with Public Works personnel to remove litter from parks. Public Works is assigned to remove litter and debris collected by these groups. The Parks and Recreation is responsible for trucks dedicated to litter removal. Public Works runs routes for litter collection and responds to citizen complaint received from E-mails, letter, etc. from the Inspection Department and Mayor's office.

Measureable Goals:

- For year one (1), the City will evaluate cost-effective methods for revising the City's Litter Ordinance #1950 which provides for the collection and disposal of garbage and trash and storm water management pursuant to Sections 11-47-13 and 11-89C-9, Code of Alabama 1975 as amended.
- For year (1) through five (5) the City will consider how to increase the number of man hours from inmates and community service hours assigned to litter collection.
- For years (1) through five (5) the City will track quantity of litter collected from right-ofways for the Annual Report.

Responsible Department: Parks and Recreation, Public Works, and Municipal Court

8.2.5 Flood Management Projects

The City shall asses the impacts to water quality resulting from flood management projects. Typical flood management projects for the City include dredging and cleaning/debris removal from drainage ditches. The Public Works Department performs these flood management projects with coordination from the Inspection Department personnel. The City will continue to evaluate erosion and sediment control during the design phase and implementation of these projects. MS4 consultants support Public Works as requested.

The City will continue to apply for grants to assist in the flood management projects for the City and other capital improvement projects.

8.3 Good Housekeeping

8.3.1 Municipal Facility Inventory

The City owns more than 25 facilities including various office buildings, equipment yards, Parking lots, parks, and one golf course. A Municipal Facility inventory is provided in Appendix F.

Measurable Goals:

- For years one (1), the City will revise the Municipal Facility Inventory to include facilities leased to or by the City, with notes for regarding maintenance responsibilities.
- For years two (2) through five (5), the City will update the facility inventory as needed.

Responsible Department: Inspection Department

8.3.2 SOPs for Municipal Operations

Good housekeeping involves good practice in operations and maintenance of vehicles and equipment, material storage practices, material inventory controls, routine and regular clean-up schedules, maintaining well organized work areas, and educational programs for employees about all of these practices. The City has prepared the following SOPs to formalize and encourage good housekeeping BMPs:

- Concrete and Sidewalk Repair;
- Asphalt and Street Repair;
- Dirt & Gravel Roads & Easements Maintenance;
- Public Structural Control Maintenance;
- Vehicle Fleet/Equipment Maintenance and Repair;
- External Building Maintenance
- Mowing and Right of Way Maintenance;
- Trash Receptacles
- Addressing Storm Water Pollution in Daily Activities;
- Pet Waste;
- Equipment Washing
- Material Storage Areas; and
- Storage and Disposal of Chemicals and Waste Materials.

The SOPs listed above are in included in Appendix C.

Measureable Goals:

• For years one (1) through five (5), annual refresher training will involve review of applicable SOPs. City employees will update SOPs, as needed. Any revision to the SOPs will be forwarded to the Inspection Department for documenting in the Annual Report/SWMP Plan

Responsible Departments: Public Works, Parks and Recreation

8.3.3 Municipal Facility Inspections

The purpose of a facility inspection is to evaluate possible conditions that may impact stormwater. Municipal facilities will be regularly inspected by Inspection Department staff. Municipal shops and equipment yards will be inspected annually at a minimum, as discussed in Section 10 and 11. A copy of the Municipal Facility Inspection Checklist can be found within Appendix D. Any deficiency will be reported to the Facility Manager for appropriate response actions.

Measureable Goals:

• For years one (1) through five (5) inspections will be conducted following the provided schedule so that all municipal facilities are inspected at least once per permit cycle. Inspections along with corrective actions will be tracked by Inspection Department for inclusion in the Annual Report.

Responsible Department: Inspection Department

8.3.4 Employee Training

Facility Managers and employees are responsible for the proper use of BMPs will receive sitespecific training based on SOPs that are applicable to their facility. Inspection personnel will conduct the training at least once during the permit cycle and according to the proposed Facility Inspection and Good Housekeeping Training Schedule provided in Appendix F. The Inspection Department will be responsible for documenting the Good Housekeeping Training.

Measureable Goals:

• For years one (1) through five (5), the City will train Facility Managers and employees responsible for the proper use of BMPs. This training will be conducted following the provided schedule so that all appropriate personnel receive training at least once per permit cycle. Training sessions will be tracked by Inspection Department for inclusion in the Annual Report.

Responsible Department: Inspection Department

9.0 STORM WATER MONITORING

Monitoring is conducted at representative in-stream monitoring locations to characterize the quality of storm water discharges from the MS4. The stormwater sampling protocol is performed in general conformance with EPA 833-B-92-001 "EPA NPDES Stormwater Sampling Guidance Document" (July 1992). Each sample is collected more than 72 hours after the end of the previous measurable rainfall event.

The City has a MS4 boundary that contains 3 impaired (303) (d) or TMDL) streams. Of the 3 impaired streams. three (3) are monitored for determining major land use characteristics inside the MS4 boundary. The major land use characteristics include industrial, residential, and commercial areas. The three representative locations include:

- Chickasaw Creek Residential
- Three Mile Creek Residential
- Toulmins Spring Branch Residential

The frequency of monitoring from the three (3) representative locations above will be semi-annual to establish a seasonal trend. Samples from the representative locations will be analyzed for the following parameters:

- A) Temperature
- B) Ph/ORP
- C) Turbidity
- D) Conductivity
- E) Dissolve Oxygen
- F) Cadmium
- G) Copper
- H) Lead
- l) Zinc
- J) Ammonia Nitrogen (NH3-N)
- K) Biochemical Oxygen Demand

L) Chemical Oxygen Demand
M) E. Coli
N) Fecal Coliform
O) Hardness as CaCO3
P) Nitrate plus Nitrite Nitrogen
Q) Oil and Grease
R) Total Dissolve Solids (TDS)
S) Total kjeldahl Nitrogen (TKN)
T) Total Nitrogen (TN)
U) Total Phosphorus
V) Total Suspended Solids (TSS)

Section 303(d) of the CWA requires that states, territories, and authorized tribes develop lists of impaired waters in their jurisdictions. The lists are required to be updated every other year, which is managed by ADEM. Water bodies included on the 303(d) list and TMDL list are considered impaired because they do not meet water quality standards for at least one designated use. As of the date of this SWMP, there are three (3) impaired waters located within the City MS4 not impacted by atmospheric deposition or sampled under the procedures outlined in Section 13.1. These three (3) impaired water bodies will be monitored semi-annually for at least two years to determine trend and overall impact. ADEM and the City may evaluate concentrations of pollutants of concern and consider annual sampling of the impaired water bodies in the future. The following is the list of impaired streams and parameters for which they are monitored.

Water body	Representative Watershed	Impairment(s)	Monitoring Parameter(s)
Three Mile Creek	Three Mile Creek	Pathogens, OE/DO	E. Coli, Fecal Coliform, BOD, COD, Dissolved Oxygen
Toulmins Springs	Three Mile Creek	Pathogens	Coliform,
Chickasaw Creek	Chickasaw Creek	Mercury	Phosphorus, Copper, Lead, Cadmium

Records are maintained including all analytical results, the date and duration (in hours) of the storm event(s) sampled; rainfall measurements (in inches) of the storm event which generated the sampled runoff; the duration (in hours) between the storm event sampled and the end of the previous measurable (greater than 0.1 inch rainfall) storm event and an estimate of the total volume (in gallons) of the discharged sampled. This data is utilized to generate the annual pollutant loading reported in the Annual Report.

10.0 IMPLEMENTATION AND REVIEW

10.1 Introduction

The Stormwater Management Program is implemented in accordance with Section 402(p) (3) (B) of the Clean Water Act, The Stormwater Regulations (40 CFR Part 122.26), ADEM's NPDES Permit Number ALS000002 and ADEM's NPDES Permit Number ALS000002 effective December 1, 2014 and expiring on November 30, 2019.

Implementation of the Stormwater Management Program was originally achieved through participation with other co-permittees in lieu of creating duplicate program elements for each individual permittee. This Stormwater Management Program, taken as a whole, achieves the "MEP" standards from Section 402(p) (3) of the Clean Water Act.

10.2 Documentation

Multiple City Departments are involved with the day-to-day responsibilities of implementing the stormwater program. Each department documents their responsibilities and reports to the Inspection Department for inclusion to the MS4 Annual Report.

10.3 Review and Revisions

The City will conduct an annual review of the current SWMP Plan in conjunction with the preparation of the Annual Report. The City may modify the SWMP at any time during the life of the permit. Modifications to the SWMP Plan shall be submitted to ADEM and described in the Annual Report.

- Adding Additional BMPs to comply with current NPDES permit
- Additional Ordinances to control pollutants in the MS4

10.4 Annual Report

An Annual Report will be prepared and submitted to ADEM no later than January 31 every year. The report shall cover the fiscal year from October 1, to September 30. The reporting requirements outlined in the Permit will be followed including:

- a. List of Contacts and Responsible Parties;
- An overall evaluation of the Stormwater management Program Elements and Progress;
- c. Narrative report of all program elements
- d. Monitoring section with maps, data, discussion of monitoring efforts, trends, analysis and interpretation;

- e. Status of implementation and proposed changes to the SWMPP Plan;
- f. Summary of inspections and nature of enforcement actions;
- g. Implementation status of the public education program; and
- h. Status of expenditures and budget for the past fiscal year and the next fiscal year covered by the Annual Report.

APPENDIX A

MAPS

APPENDIX B ORGANIZATIONAL CHART FOR STORMWATER PROGRAM MANAGEMENT

APPENDIX C STANDARD OPERATING PROCEDURES

APPENDIX D

INSPECTION CHECKLIST

APPENDIX E

STORMWATER POLLUTION AND PREVENTION AND MANAGEMENT ORDINANCE

APPENDIX F

Municipal Facility Inventory and Traning/Inspection Schedule

CITY OF PRICHARD STANDARD OPERATING PROCEDURES

DEPARTMENT: Public Works

JOB TASK: Addressing Storm Water Pollution in Daily Activities:

SEE ENCLOSURES