



CITY OF ANNISTON

NPDES PHASE II MS4 ANNUAL REPORT

Reporting Period: April 1, 2018 –March 31, 2019

Submitted To:

Alabama Department of Environmental Management
Stormwater Management Branch
Water Division
1400 Coliseum Boulevard
PO Box 301463
Montgomery, AL 36130

May 31, 2019

TABLE OF CONTENTS **I**

RESPONSIBLE PARTY AND PLAN CERTIFICATION **1**

 RESPONSIBLE PARTY.....1

 CERTIFYING OFFICIAL.....1

 PLAN CERTIFICATION.....2

INTRODUCTION **3**

 CO-PERMITTEE IMPLEMENTATION COORDINATION3

 IMPAIRED WATERWAYS AND WATER QUALITY MONITORING.....3

 RECORDKEEPING4

 SWMP EVALUATION.....4

1. PUBLIC EDUCATION AND PUBLIC INVOLVEMENT **5**

 A. STATUS OF COMPLIANCE WITH PERMIT CONDITIONS IN CURRENT REPORTING CYCLE.....5

 B. ASSESSMENT OF CONTROLS AND STORMWATER ACTIVITIES TO BE UNDERTAKEN DURING THE NEXT REPORTING CYCLE.....5

 C. PROPOSED CHANGES TO THE SWMPP.....5

2. ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDDE)..... **9**

 A. STATUS OF COMPLIANCE WITH PERMIT CONDITIONS IN CURRENT REPORTING CYCLE9

 B. ASSESSMENT OF CONTROLS AND STORMWATER ACTIVITIES TO BE UNDERTAKEN DURING THE NEXT REPORTING CYCLE.....9

 C. PROPOSED CHANGES TO THE SWMPP.....9

3. CONSTRUCTION SITE STORMWATER RUNOFF CONTROL **12**

 A. STATUS OF COMPLIANCE WITH PERMIT CONDITIONS IN CURRENT REPORTING CYCLE.....12

 B. ASSESSMENT OF CONTROLS AND STORMWATER ACTIVITIES TO BE UNDERTAKEN DURING THE NEXT REPORTING CYCLE.....12

 C. PROPOSED CHANGES TO THE SWMPP.....12

4. POST CONSTRUCTION STORMWATER MANAGEMENT IN NEW DEVELOPMENT AND REDEVELOPMENT..... **15**

 A. STATUS OF COMPLIANCE WITH PERMIT CONDITIONS DURING CURRENT REPORTING CYCLE.....15

 B. STORMWATER ACTIVITIES TO BE UNDERTAKEN DURING THE NEXT REPORTING CYCLE.....15

 C. PROPOSED CHANGES TO THE SWMPP.....15

5. POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS **18**

 A. STATUS OF COMPLIANCE WITH PERMIT CONDITIONS DURING CURRENT REPORTING CYCLE.....18

 B. STORMWATER ACTIVITIES TO BE UNDERTAKEN DURING THE NEXT REPORTING CYCLE.....18

 C. PROPOSED CHANGES TO THE SWMPP.....18

6. IMPAIRED WATERS MONITORING PLAN..... **21**

Responsible Party and Plan Certification

Responsible Party

The following individuals are responsible for the implementation of the City's Stormwater Management Program (SWMP) and stormwater minimum control measures outlined in the City's Stormwater Management Program Plan (SWMPP):

James R. Johnson, City Manager
P.O. Box 2168, Anniston, AL 36202
Phone: 256-236-3422
Fax: 256-231-7632
citymanager@anniston.al.gov

Lance Armbruster, P.E., City Engineer
City of Anniston Public Works Department
P.O. Box 2168, Anniston AL, 36202
Phone: 256-231-7750
larmbruster@anniston.al.gov

Assistance with preparation of this Annual report was provided by the following party and overseen by the City of Anniston:

Goodwyn Mills Cawood
35 Abercorn Street, Savannah, GA 31410

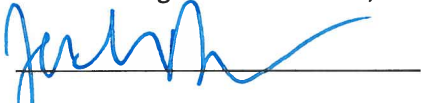
Certifying Official

All notices of intent, reports, certifications, or information submitted to the Department, or other information, should be signed and certified in accordance with Part VII.G of the facility's Phase II Stormwater Permit. The certifying official for this Annual Report and a Principal Executive Officer for the City of Anniston is as follows:

Mayor Jack Draper
1128 Gurnee Avenue
Anniston, Alabama 36201
Phone: 256-236-3422
Fax: 256-231-7632
jdraper@anniston.al.gov

Plan Certification

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 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 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 and imprisonment for knowing violations.



Mayor Jack Draper
City of Anniston, Alabama

5/21/19

Date

Introduction

The City of Anniston has completed this Annual Report in compliance with Part VI, Annual Reporting Requirements, of the NPDES Phase II MS4 permit ALR040050, which became effective on October 1, 2016. The permit requires that the City of Anniston submit an annual report to the Alabama Department of Environmental Management (ADEM) each year by May 31st. Annual Reports should cover the year (April 1 – March 31) prior to the submittal date. This annual report covers the period of April 1, 2018 – March 31, 2019.

In accordance with the requirements of the permit, the Annual Report includes the following information as stipulated in Part VI, Annual Reporting Requirements:

- a) A list of contacts and responsible parties who had input to and are responsible for the preparation of the annual report;
- b) Overall evaluation of the stormwater management program developments and progress;
- c) Narrative report of all minimum stormwater control measures referenced in the permit;
- d) Summary table of the stormwater controls that are planned/scheduled for the next reporting cycle;
- e) Results of information collected and analyzed, if any, during the reporting period, including monitoring data used to assess the success of the program at reducing the discharge of pollutants;
- f) Notice of reliance on another entity to satisfy permit obligations; and
- g) Monitoring results collected during the previous year in accordance with Part V, if applicable.

These elements will be addressed within this Annual Report and in each section detailing the implementation of the five minimum stormwater control measures: 1) Public Education and Involvement; 2) Illicit Discharge Detection and Elimination; 3) Construction Site Stormwater Runoff Control; 4) Post-Construction Stormwater Management in New Development and Redevelopment; and 5) Pollution Prevention/Good Housekeeping for Municipal Operations.

Co-Permittee Implementation Coordination

The City of Anniston is responsible for implementing all aspects of its SWMP and meeting all permit requirements.

Impaired Waterways and Water Quality Monitoring

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 (40 CFR 130) require states to identify water bodies 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.

Based on the 2018 303(d) list developed by ADEM, there currently is one impaired stream segment (Cane Creek) within the City's MS4 (i.e., the urbanized areas of incorporated areas of Anniston). A TMDL has not yet been developed for this stream segment. Based on this new impaired stream listing, the City has developed a draft Impaired Waters Monitoring Plan, a copy of which is included in Appendix 6, for ADEM's review. The City has also initiated water quality sampling and provided the results with this Annual Report.

Recordkeeping

Appropriate 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.

SWMP Evaluation

The City of Anniston revised its SWMP to meet the requirements of the NPDES Phase II MS4 permit ALR040050, which became effective on October 1, 2016. The City's SWMPP was accordingly revised and ADEM approved the revision in January 2017. Minor changes to the City's SWMPP were subsequently made during the 2016-2017 and 2017-2018 reporting period and these changes were detailed in the Annual Reports for those reporting years.

During the current and previous reporting period, one of the City's improvements to its SWMP has been to focus effort on its inventory and inspection program of privately-owned stormwater post-construction controls. The City also recently developed a draft Impaired Waters Monitoring Plan and has initiated sampling, the results of which are summarized in Section 6 of this report. A copy of the draft Plan is provided for ADEM's review and approval in Appendix 6. Several other proposed BMP modifications are noted in this Annual Report to reflect changes and improvements to the City's stormwater program.

The City is in the process of completing a thorough review of its SWMPP and plans to submit a complete copy of the revised SWMPP to ADEM no later than June 7, 2019 for review and approval. The City will note any additional proposed modifications of the SWMPP at the time of its submittal.

Overall, the City feels that the SWPPP has been effective in helping identify, and remove, potential pollutants to the City's MS4 system.

1. Public Education and Public Involvement

a. Status of Compliance with Permit Conditions in Current Reporting Cycle

Table 1 below summarizes the activities the City has undertaken during the reporting period to inform the public about stormwater issues, including stormwater pollution prevention, and to encourage the citizens of Anniston to actively participate in the development and implementation of the SWMP as well as the protection of their local water resources. This included the implementation of eight (8) Best Management Practice (BMP) recommendations. Additional public educational and involvement activities also took place in the City of Anniston that exceeded the SWMP and BMP requirements. These activities are also summarized below in Table 1.

b. Assessment of Controls and Stormwater Activities to be Undertaken During the Next Reporting Cycle

These BMPs were effective at reaching the targeted audiences, and the City intends to continue the public education and involvement activities in the upcoming permit cycle as listed in Table 1 of this Annual Report and Table 2: Minimum Control Measures Compliance Matrix of the City's SWMPP.

The City proposes to modify the SWMPP as noted below.

c. Proposed Changes to the SWMPP

The City proposes to update the SWMPP as follows. These changes do not reduce or substantially alter the City's Public Education and Involvement BMPs. Please note the City is in the process of completing a thorough review of its SWMPP, and plans to submit a complete copy of the revised SWMPP to ADEM shortly after submittal of this Annual Report. Any additional changes to the SWMPP will be noted.

- BMP 1.C Utility Bill Stuffers/Headers: The City proposes to change the name of this BMP to "Utility Bill Headers."

**Table 1
 MCM #1
 Public Education and Public Involvement
 Part III.B.1**

BMP(s)	Description of Activities Conducted During Reporting Period	Date/Frequency & No. of Participants	Stormwater Controls/BMP(s) Planned for Next Reporting Cycle
1.A Public Service Announcement	The City issued two separate PSAs through the City's Social Media site (Facebook) that informed the public about the importance of litter and debris removal and encouraged citizens to properly dispose of wastes. A copy of the PSAs are included in Appendix 1.A.	10/31/18 & 11/17/18 (city wide)	Same as current cycle
1.B Stormwater Webpage	The City's webpage located at http://www.anniston.al.gov/pages/?pageID=193 was updated with the City's most recent Stormwater Management Program Plan (SWMPP) and Annual Report. A screenshot of the City's webpage and webpage views is included in Appendix 1.2. No complaints were reported through the website from citizens regarding illicit dumping, illicit discharges and E&S control violations.	Ongoing/as needed (city wide) The stormwater website had 1,059 views during the reporting year.	Same as current cycle
1.C Utility Bill Stuffers/Headers	Quarterly utility bills were sent out with an educational header that informed the public about stormwater issues via an "Only Rain Down the Drain" message that encouraged citizens to properly dispose of wastes. The header directed the Public to report illegal dumping to the City and included the City's website. An example utility bill with the stormwater educational header is included in Appendix 1.C.	Quarterly (all residential and commercial account holders)	The City proposes to change the name of this BMP to "Utility Bill Headers."
1.D Student Education	The City of Anniston partnered with the Calhoun County Extension, Choccolocco Creek Watershed, Anniston Water Works and Sewer Board and Tyler Union to teach over 800 fourth graders from across Calhoun County about water resources to celebrate Earth Day. The presentations included 'reduce, reuse and recycle', watershed principles and drinking water protection and distribution. The Calhoun County Earth Day was hosted at the Anniston Museum of Natural History. Documentation of the event is included in Appendix 1.D.	April 22, 2018 800 4 th grade students. The students came from across Calhoun County, including multiple schools within the City of Anniston.	Same as current cycle
1.E Citywide Cleanup	The City facilitated a neighborhood cleanup event to encourage residents and businesses to pick up litter and trash in the community. The event was advertised to the general public, and a copy of a	June 2, 2018 (25 volunteers). The City estimates that this event	Same as current cycle

	promotional flier is included in Appendix 1.E. Volunteers received free “Keep It Beautiful” t-shirts.	prevented 2.1 tons of trash from entering the MS4 near Constantine and Noble Streets.	
1.F Storm Drain marking	This event was scheduled for March 2019. In March, there was a scheduling conflict with Anniston High School and there wasn’t an opportunity to reschedule the event. The City plans to schedule this event earlier in the report year and/or include a different organization to prevent future schedule conflicts. It should be noted that additional public educational and involvement activities took place in the City to help educate the public about water quality issues and how to prevent stormwater pollution. These activities are summarized below and show the City’s commitment to educating the public about water quality issues and stormwater pollution prevention.	N/A	Schedule event earlier and/or include alternate organization (no change to the BMP)
1.G Litter Reduction	<ul style="list-style-type: none"> The City continued a weekly litter reduction and pickup program with the aid of community service workers. The City estimated that 1,185 community service hours were spent on litter pickup. Other educational BMPs overseen by the City that also addressed the need for litter prevention and/or reduction included utility bill headers, social media PSAs, student education at Earth Day events, and the city wide cleanup. <p>In addition, the following activities took place in the City that addressed litter reduction:</p> <ul style="list-style-type: none"> June 14, 2018: A recycling event titled “Reduce, Reuse Recycle” event was advertised to encourage residents and businesses to drop off recyclables at designated locations. July 2018: Anniston High School participated in a litter cleanup event. December 14, 2018: An electronics recycling event was held with a pickup location within City limits. Recycling notices were also posted to social media several times during the reporting period to encourage general recycling activities. <p>Documentation of these educational activities is included in Appendix 1.A-1.G.</p>	Weekly (or more frequent) litter pickup; an estimated 1,185 community service were dedicated to litter pick up.	Same as current cycle
1.H Public Input on SWMPP Materials	The most recent SWMPP and Annual Report were posted on the City’s website and made available at City Hall for residents to view and provide	Ongoing (city wide)	Same as current cycle

	<p>comments. No comments were received on these materials during the reporting period. Documentation of the postings on the City’s website is included in Appendix 1.H.</p>		
<p>Additional Public Education and Public Involvement Activities</p>	<p>Additional public educational and involvement activities and events not required by the City’s SWMPP took place in the City of Anniston to help educate the public about water quality issues and how to prevent stormwater pollution. These included:</p> <ul style="list-style-type: none"> • A pamphlet describing practical tips to prevent stormwater pollution was displayed at Anniston City Hall in the Public Works Department. • The Alabama 4-H Center offered “Camp Cane Creek”, a weekly educational summer camp from July 9-August 3, 2018, that educated participants about water quality and event notices were posted on social media. • A Pesticide Applicator Training/Test course was offered by the Calhoun County Extension Office on November 7, 2018. • Lunch and Learn events were offered by the Calhoun County Extension Office at the Cane Creek Community Gardens on June 27 and July 25, 2018. These training seminars focused on the safe use of chemicals in the home garden. <p>Documentation of these events is included in Appendix 1.</p>	<p>Various/Ongoing</p>	

2. Illicit Discharge Detection and Elimination (IDDE)

a. Status of Compliance with Permit Conditions in Current Reporting Cycle

Table 2 below summarizes the activities the City has undertaken during the reporting period to detect and eliminate illicit discharges to the City's MS4, including the results of any information collected and analyzed. This included the implementation of six (6) BMP recommendations.

b. Assessment of Controls and Stormwater Activities to be Undertaken During the Next Reporting Cycle

These BMPs were effective at reaching the targeted audiences, and the City intends to continue the IDDE activities in the upcoming permit cycle as listed in Table 2 of this Annual Report and Table 2: Minimum Control Measures Compliance Matrix of the City's SWMPP.

The City proposes to modify the SWMPP as noted below.

c. Proposed Changes to the SWMPP

The City proposes to update the SWMPP as follows. These changes do not reduce or substantially alter the City's IDDE-related BMPs and procedures. Please note the City is in the process of completing a thorough review of its SWMPP and plans to submit a complete copy of the revised SWMPP to ADEM shortly after submittal of this Annual Report. Any additional changes to the SWMPP will be noted.

- BMP 2.A: The City proposes to develop a separate document outlining the methodology and procedures to be followed during dry weather screening activities and follow up source tracing, if needed. The City does not plan to alter its procedures or scope of its dry weather screening/illicit discharge detection program; rather, the City will add additional detail to its procedures based on comments provided by ADEM during a MS4 Audit that ADEM conducted in February 2018. The City also plans to change the name of the inspection sheet used to document dry weather screening.
- BMP 2.D: The City plans to modify the name of its outfall inventory map. The map, formerly referenced as a Storm Sewer Map, will be titled "MS4 Outfall Map".
- BMPs 2.E and 2.F: The City proposes to reword these BMPs to clarify that annually, the City will review and amend its IDDE ordinance, if needed, and that enforcement of the City's IDDE ordinance is ongoing.
- BMP 2.G: The City proposes to modify this BMP to expand training opportunities, including offsite training as well as in house training.

Table 2 MCM #2 Illicit Discharge Detection and Elimination Program (IDDE) Part III.B.2			
BMP(s)	Description of Activities Conducted During Reporting Period	Results of Information Collected and Analyzed (if applicable)	Stormwater Controls/BMP(s) Planned for Next Reporting Cycle
2.A IDDE Program	The City screened eight (8) of the identified MS4 outfalls in February 2019 in accordance with the dry weather screening protocols the City has implemented to identify and eliminate illicit discharges.	Screening activities were documented on inspection sheets, copies of which are included in Appendix 2.A. None of the outfalls screened had evidence of an illicit discharge.	The City has developed more comprehensive dry weather screening procedures and will include them in the revised SWMPP for ADEM’s review and approval.
2.B Used Oil Recycling	The City Public Works Department accepts used oil from residents for recycling. This program was ongoing throughout the current reporting period. Drop off was available to the public 24 hours a day, 7 days a week at the Public Works Facility. The City contracted with a used oil recycler to ensure that oil collected was properly handled.	The City recycled 300 gallons of used oil during the reporting period.	Same as current cycle
2.C Citizen Complaint Program	The City investigated citizen complaints and other IDDE-related stormwater issues as well as E&S control violations and documented these follow up activities in a stormwater spreadsheet. A copy of the spreadsheet is provided in Appendix 2.C.	The City received a citizen complaint from a property owner on August 7, 2018. The City’s Code Enforcement officer investigated the complaint on August 7 th and a follow-up inspection to close out the complaint was completed on August 8, 2018. The City documented the complaint and investigations in a spreadsheet. A copy of the spreadsheet and supporting documentation, including site photographs, are provided in Appendix 2.C.	Same as current cycle
2.D MS4 Outfall Map	The City maintains an inventory and map of MS4 Outfalls and structural BMPs that is updated annually based on information available to the City and through field investigations. A copy of an updated MS4 outfall map and inventory is provided in Appendix 2.D.	Three outfalls identified during field activities were added to the City’s MS4 outfall map and inventory. No outfalls were removed from the City’s current inventory.	The City proposes to change the name of this map.
2.E/2F Illicit Discharge	The Illicit Discharge regulations (Chapter 29 1/2 , Section 8 of the City	No updates to the Illicit Discharge regulations were made. The link to	The City proposes to clarify the BMP

<p>Ordinance and Enforcement</p>	<p>code) are evaluated on a yearly basis to see what modifications or changes may be needed. The City enforces the ordinance, and documents illicit discharge-related investigations and follow up activities.</p>	<p>the most updated ordinance is https://www.municode.com/library/al/anniston/codes/code_of_ordinances?nodeId=CO_CH29_1-2STMA_ARTISTMARE_S29_1-2_1GEPR. The City investigated several illicit discharge-related complaints and documented the complaints and follow up investigations. (See spreadsheet entries for 4/20/18; 1/9/19 and 2/13/19 in Appendix 2.E)</p>	<p>language (scope of BMP will remain unchanged).</p>
<p>2.G Employee Training</p>	<p>Four employees, both at the staff and supervisory levels, attended an offsite training program in August 2018 that was provided by the Alabama Soil and Water Conservation Commission. The program provided technical training in erosion and sediment control. A supervisory staff member also attended an annual regional Watershed Water conference on November 8, 2018. Documentation of training activities is provided in Appendix 2.F.</p>	<p>N/A</p>	<p>The City proposes to expand this BMP to include offsite and in house training.</p>

3. Construction Site Stormwater Runoff Control

a. Status of Compliance with Permit Conditions in Current Reporting Cycle

Table 3 below summarizes the activities the City has undertaken during the reporting period to control erosion and sedimentation from construction site runoff within the City of Anniston, including the results of any information collected and analyzed. This included the implementation of nine (9) BMP recommendations.

b. Assessment of Controls and Stormwater Activities to be Undertaken During the Next Reporting Cycle

These BMPs were effective at reaching the targeted audiences, and the City intends to continue implementing construction site stormwater runoff controls during the upcoming permit cycle as listed in Table 3 of this Annual Report and Table 2: Minimum Control Measures Compliance Matrix of the City's SWMPP.

The City proposes to modify the SWMPP as noted below.

c. Proposed Changes to the SWMPP

The City proposes to update the SWMPP as follows. These changes do not reduce or substantially alter the City's Construction Site Stormwater Runoff Control BMPs and procedures. Please note the City is in the process of completing a thorough review of its SWMPP, and plans to submit a complete copy of the revised SWMPP to ADEM shortly after submittal of this Annual Report. Any additional changes to the SWMPP will be noted.

- BMP 3.A: The E&S Ordinance will be modified during the next reporting cycle to reference the most updated edition of the Alabaman Handbook for Erosion Control, Sediment Control and Stormwater Management on Construction Sites and Urban Areas (July 2018 edition).

Table 3
MCM #3
Construction Site Stormwater Runoff Control
Part III.B.3

BMP(s)	Description of Activities Conducted During Reporting Period	Results of Information Collected and Analyzed (if applicable)	Stormwater Controls/BMP(s) Planned for Next Reporting Cycle
3.A/3.G Erosion and Sedimentation (E&S) Control Regulations & Construction Site Pollution Control	The E&S regulations (Chapter 29 ½, Section 5 of the City code) are evaluated on a yearly basis to see what modifications or changes may be needed. Section 29 ½, Chapter 5 of these regulations currently includes the following standards for construction site operators: "control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site."	The City did not update the E&S regulations during the reporting cycle. The link to the most updated ordinance is https://www.municode.com/library/a/anniston/codes/code_of_ordinances/?nodeId=CO_CH29_1-2STMA_ARTISTMARE_S29_1-2_1GEPR	The E&S Ordinance will be modified during the next reporting cycle to reference the most updated edition of the Alabama Handbook for Erosion Control, Sediment Control and Stormwater Management on Construction Sites and Urban Areas, July 2018.
3.B Qualified Credentialed Inspector (QCI) Program	Lance Armbruster, who oversees this program for the City, is a Professional Engineer and Qualified Credential Professional. Individuals performing routine stormwater inspections completed Qualified Credentialed Inspector refresher courses and/or received technical training in erosion and sediment control and met continuing education requirements for existing QCI certifications during the reporting period. Documentation of the training activities is included in Appendix 3.B.	N/A	Same as current cycle
3.C E&S Inspections	The City inspects qualifying construction sites to ensure they meet the standards set in the City's Erosion & Sediment Control regulations. City staff who received their QCI certification perform site inspections and document the results utilizing an inspection checklist.	The City documented the results of construction site inspections in a comprehensive summary spreadsheet that lists the identified deficiencies or violations, follow-up actions required, and enforcement actions taken. A copy of the City's Stormwater Tracking Database/summary site inspection spreadsheet is included in Appendix 3.C. A copy of the checklist used to document site inspections is also included in Appendix 3.C. Copies of individual inspection checklists are maintained by the City. Due to the large number of records, the City has	Same as current cycle

		not included copies of completed inspection checklists in the Appendix but they may be provided upon request.	
3.D/3.F Site Plan Review & Alabama Handbook	The City's Stormwater Management Ordinance requires all applicants for LDPs to submit an Erosion and Sediment Control Plan (ESCP). The ESCP must be designed by an acceptably accredited professional and conform to the requirements found in the Alabama Handbook. The City did not issue LDPs until it was established that the ESCP was consistent with City requirements. The City used a Site Development Plan Checklist as part of its review procedures. A copy of the checklist is included in Appendix 3.D_3.F.	The City reviewed twenty-one (21) site plans during the reporting period. Nine (9) LDPs were issued. A database summarizing site plan reviews is included in Appendix 3.D_3.F.	Same as current cycle
3.E. ADEM Notification	The City maintains comprehensive documentation of stormwater issues, including illicit discharges and E&S related problems, and submitted documentation and information to ADEM as needed regarding issues and violations.	Documentation of notifications made to ADEM since the last Annual Report submittal is provided in Appendix 3.E.	Same as current cycle
3.H Enforcement Tracking Database	The City maintains a comprehensive database of all enforcement actions taken at qualifying construction sites. This database includes the location and contact information for the site, types of enforcement actions taken, date of action, recommended remediation measures, dates of any follow-up inspections, dates of any correspondence with the site operator/developer, dates of any correspondence with ADEM, if applicable, and the nature of that correspondence. The City also maintains documentation of enforcement activities such as emails, photographs, and notifications made to ADEM.	A copy of this database and enforcement activity records, including notifications made to ADEM as part of the City's enforcement follow-up activities, is included in Appendix 3.H.	Same as current cycle
3.I Erosion and Sediment Control Record Keeping	The City maintains E&S-related documentation on file at the facility, including copies of all inspection records, enforcement activities taken, correspondence with ADEM, employee training, and records of citizen complaints.	E&S records are provided in Appendices 3.A-3.H.	Same as current cycle (maintain E&S Records)

4. Post Construction Stormwater Management in New Development and Redevelopment

a. Status of Compliance with Permit Conditions During Current Reporting Cycle

Table 4 below summarizes the activities the City has undertaken during the reporting period to control post construction stormwater runoff within the City of Anniston, including the results of any information collected and analyzed. This included the implementation of six (6) BMP recommendations.

b. Stormwater Activities to be Undertaken During the Next Reporting Cycle

The City ensures that new development sites meet the requirements of the City Stormwater Management Ordinance, and that inspections and Maintenance Agreements are executed for any new private stormwater controls, such as detention ponds.

The City proposes to modify the SWMPP as noted below.

c. Proposed Changes to the SWMPP

The City proposes to update the SWMPP as follows. These changes do not reduce or substantially alter the City's Post Construction Stormwater Management BMPs and procedures. Please note the City is in the process of completing a thorough review of its SWMPP, and plans to submit a complete copy of the revised SWMPP to ADEM shortly after submittal of this Annual Report. Any additional changes to the SWMPP will be noted.

- BMPs 4.A/4.B: The City plans to update the Stormwater Management Ordinance (Chapter 29 ½ of the City code) to reference the most current edition of the Alabama Handbook for Erosion Control, Sediment Control and Stormwater Management on Construction Sites and Urban Areas, July 2018.
- BMP 4.D: The City proposes to change the name to reflect that the City has implemented a process to inventory and inspect private stormwater controls.

**Table 4
 MCM #4
 Post-Construction Site Stormwater Runoff Control
 Part III.B.4**

BMP(s)	Description of Activities Conducted During Reporting Period	Results of Information Collected and Analyzed (if applicable)	Stormwater Controls Planned for Next Reporting Cycle
4.A Stormwater Design Manual	The City adopted as its stormwater design and BMP manual the 2003 Alabama Handbook for Erosion Control, Sediment Control, and Stormwater Management on Construction Sites and Urban Areas, prepared by ADEM. The handbook is incorporated by reference into the City's Stormwater Management Ordinance. All stormwater management plans for all qualifying development projects are required to implement structural and/or non-structural BMPs in compliance with the Alabama Handbook and the Stormwater Ordinance.	During this reporting period, there were no updates to these standards.	The City plans to update the Stormwater Management Ordinance(Chapter 29 ½ of the City code) to reference the most current edition of the Alabama Handbook for Erosion Control, Sediment Control and Stormwater Management on Construction Sites and Urban Areas, July 2018.
4.B Stormwater Management Ordinance	Post Construction standards are specified within the City's Stormwater Management Ordinance (Chapter 29 ½, Section 6 of the City code), which was adopted in 2008 and updated again in 2014. The City reviewed its current Stormwater Management Ordinance to determine if updates needed to be made to ensure that the City's ordinance meets the requirements of the NPDES Phase II MS4 permit.	During this reporting period, there were no updates made for these standards. The link to the most updated ordinance is https://www.municode.com/library/al/anniston/codes/code_of_ordinances?nodeId=CO_CH29_1-2STMA_ARTISTMARE_S29_1-2_1GEPR	The City plans to update the Stormwater Management Ordinance to reference the most current edition of the Alabama Handbook for Erosion Control, Sediment Control and Stormwater Management on Construction Sites and Urban Areas, July 2018.
4.C Site Plan Reviews	The City performed site plan reviews of the stormwater management plans for all development and redevelopment projects that applied for an LDP. The stormwater management plans were reviewed for	The City reviewed twenty-one (21) site plans during the reporting period. Nine (9) LDPs were issued. A	Same as current cycle

	compliance with the standards set forth in the City's Stormwater Management Ordinance.	database summarizing site plan reviews is included in Appendix 4.C.	
4.D Maintenance Agreement	<p>The City completed an inventory of private stormwater management facilities (i.e., private stormwater retention/detention ponds). The City inspected these facilities and completed checklists to document the inspection results (see Appendix 4.D for inspection records).</p> <p>The City requires that Maintenance Agreements be executed for applicable onsite stormwater management facilities.</p>	<p>The City inspected nine (9) private ponds at 8 sites. The City documented the results of the inspections, including recommendations made to correct any noted deficiencies. Two (2) new maintenance agreements were also executed during the reporting period. The City's inventory, inspection checklists, and new maintenance agreements are provided in Appendix 4.D.</p>	<p>The name of this BMP will be changed as follows: 4.D Privately-Owned Structural BMP Inspection and Maintenance Program</p>
4.E City Owned/Operated Structural BMP Maintenance	<p>The City completed an inventory of City-owned stormwater management facilities (i.e., stormwater retention/detention ponds). The City inspected these facilities and completed checklists to document the inspection results (see Appendix 4.E for inspection records).</p>	<p>The City currently has three (3) detention ponds that it is responsible for maintaining. During this reporting period, the city inspected all three of these ponds. Records of the inspections and recommended maintenance activities are included in Appendix 4.E. Pond locations are inventoried on the outfall inventory map also included in Appendix 4.E.</p>	<p>Same as current cycle</p>
4.F Green Infrastructure Ordinance Review	<p>A review of the City's Green Infrastructure Ordinance was conducted during a previous reporting period. A copy of the completed checklist is included in Appendix 4.F.</p>	<p>No amendments were made to local ordinance or codes.</p>	<p>Same as current cycle</p>

5. Pollution Prevention/Good Housekeeping for Municipal Operations

a. Status of Compliance with Permit Conditions During Current Reporting Cycle

Table 5 below summarizes the activities the City has undertaken during the reporting period to prevent pollution and improve housekeeping for municipal operations, including the results of any information collected and analyzed. This included the implementation of six (6) BMP recommendations.

b. Stormwater Activities to be Undertaken During the Next Reporting Cycle

These BMPs were effective at reaching the targeted audiences, and the City intends to continue implementing good housekeeping measures during the upcoming permit cycle as listed in Table 5 of this Annual Report and Table 2: Minimum Control Measures Compliance Matrix of the City's SWMPP.

The City proposes to modify the SWMPP as noted below.

c. Proposed Changes to the SWMPP

The City proposes to update the SWMPP as follows. These changes do not reduce or substantially alter the City's Pollution Prevention/Good Housekeeping Management BMPs and procedures. Please note the City is in the process of completing a thorough review of its SWMPP, and plans to submit a complete copy of the revised SWMPP to ADEM shortly after submittal of this Annual Report. Any additional changes to the SWMPP will be noted.

- BMP 5.B: The City proposes to modify this BMP to expand training opportunities, including offsite training as well as in house training.

**Table 5
 MCM #5
 Pollution Prevention/Good Housekeeping for Municipal Operations
 Part III.B.5**

BMP(s)	Description of Activities Conducted During Reporting Period	Results of Information Collected and Analyzed (if applicable)	Stormwater Controls/BMP(s) Planned for Next Reporting Cycle
5.A City Facility Inspections	City staff performed stormwater site inspections for the following nine (9) City facilities during this permit period: two (2) Public Works facilities, five (5) Fire Stations, and two (2) Parks and Recreation facilities. City staff completed an inspection checklist at each site and documented site inspections with photographs; these checklists and photographs are included in Appendix E.	There was no evidence of pollutants leaving the site at any of these facilities during the site inspections. A few minor housekeeping issues were identified that will be corrected.	Same as current cycle
5.B Employee Good Housekeeping Education	Four employees, both at the staff and supervisory levels, attended an offsite training program in August 2018 that was provided by the Alabama Soil and Water Conservation Commission. The program provided technical training in erosion and sediment control. A supervisory staff member also attended an annual regional Watershed Water conference on November 8, 2018. Documentation of training activities is provided in Appendix 5.B.	N/A	The City proposes to revise this BMP to include both in house and/or external training.
5.C De-icing Program	All bulk material, such as sand and aggregate, was protected onsite by a three (3) foot retaining wall with sediment ponds installed to allow for settling of any materials before they enter the stormwater system. When de-icing is necessary, the City attempts to limit the use of road salts and use a sand/calcium chloride mixture, when possible. Calcium Chloride was never stored outside and was kept in #50 sealed bags inside the City's warehouse.	There were no de-icing events this reporting period.	Same as current cycle
5.D Street Sweeping and Litter Pick Up	Street sweeping was performed on a continuous, daily basis. The route included all City streets with curb and gutter. The City of Anniston also hosted a city-wide cleanup and facilitated litter pick up throughout the City with the assistance of community service workers (see BMPs 1.E and 1.G).	The street sweeper operated an estimated 1,230 hours by a dedicated employee during the reporting period. Community service workers collected litter for approximately 1, 185 hours, and 2.1 tons of trash were collected during the city-wide cleanup.	Same as current cycle
5.E MS4 Maintenance Program	Right-Of-Way (ROW) Maintenance included removal of debris and sediment from catch basins, inlets, and ditches; removal of litter and mowing; ditch maintenance; removal of trees and stump grinding; and condition assessments	N/A	Same as current cycle

	<p>and repairs of drainage structures, when needed. Drainage cleanouts and structures that needed repair or replacement were entered into the Work Order Database system and/or other City records.</p> <p>The City dedicated crew to leaf removal during the months of October to April. This crew operated leaf vacuum machines that removed leaves from the MS4 including storm drains, inlets, ditches, etc.</p>		
<p>5.F Water Quality Impact Assessment</p>	<p>The City operates a Capital Improvement Program to address structural flood management and drainage issues. The City conducts a water quality impact assessment during the design phase of 100% of drainage and flooding related CIPs (as funding becomes available for their implementation).</p>	<p>The City did not conduct any new CIPs this year and therefore no water quality impact evaluations were performed.</p>	<p>Same as current cycle</p>

6. Impaired Waters Monitoring Plan

Based on the 2018 303(d) list developed by ADEM, there currently is one impaired stream segment (Cane Creek) within the City's MS4 (i.e., the urbanized areas of incorporated areas of Anniston). Therefore, the City has developed a draft Impaired Waters Monitoring Plan, a copy of which is included in Appendix 6, for ADEM's review and approval. The City proposed to sample at least two sites on Cane Creek in the draft Impaired Waters Monitoring Plan.

The City initiated water quality sampling of Cane Creek in February 2019. Copies of analytical results are provided in Appendix 6, and summarized below.

Site Location	Sampling Result (#cols/100 ml)- 2/5/19
CC-1 (Iron Mountain Road)	100
CC-2 (Woodland Park)	350