



CITY OF ANNISTON

NPDES PHASE II MS4 ANNUAL REPORT

Reporting Period: April 1, 2019 –March 31, 2020

Submitted To:

Alabama Department of Environmental Management
Stormwater Management Branch
Water Division
1400 Coliseum Boulevard
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May 27, 2020

TABLE OF CONTENTS	I
RESPONSIBLE PARTY AND PLAN CERTIFICATION	1
RESPONSIBLE PARTY	1
CERTIFYING OFFICIAL	1
PLAN CERTIFICATION	2
INTRODUCTION	3
CO-PERMITTEE IMPLEMENTATION COORDINATION	3
IMPAIRED WATERWAYS AND WATER QUALITY MONITORING	3
RECORDKEEPING	4
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 CYCLE	9
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	16
A. STATUS OF COMPLIANCE WITH PERMIT CONDITIONS DURING CURRENT REPORTING CYCLE	16
B. STORMWATER ACTIVITIES TO BE UNDERTAKEN DURING THE NEXT REPORTING CYCLE	16
C. PROPOSED CHANGES TO THE SWMPP	16
5. POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS	19
A. STATUS OF COMPLIANCE WITH PERMIT CONDITIONS DURING CURRENT REPORTING CYCLE	19
B. STORMWATER ACTIVITIES TO BE UNDERTAKEN DURING THE NEXT REPORTING CYCLE	19
C. PROPOSED CHANGES TO THE SWMPP	19
6. IMPAIRED WATERS MONITORING PLAN	22

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):

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

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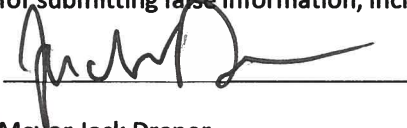
Certifying Official

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:

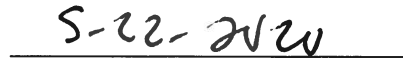
Mayor Jack Draper
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Plan Certification

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



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, 2019 – March 31, 2020.

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 2020 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. The City developed a draft Impaired Waters Monitoring Plan during the last reporting period and submitted it for ADEM's review in conjunction with the City's 2018 – 2019 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. The City also updated its SWMPPP in the 2018-2019 reporting period and submitted a complete copy of the revised plan to ADEM for review.

One change is planned for the SWMPP this reporting period. The City proposes to replace "BMP 1.F Storm Drain Marking" with the following: "BMP 1.F Stormwater Information Booth." The City proposes to provide stormwater educational handouts at an information booth at a community event held within the City of Anniston.

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 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.

BMP 1.F Storm Drain Marking: In lieu of Storm Drain Marking, the City proposes to set up a Stormwater Information Booth at a community event and distribute educational materials.

**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	<p>The City issued a video PSA through the City of Anniston’s Facebook page on 2/20/20 that informed the public about the importance of litter and debris removal and encouraged citizens to properly dispose of wastes. For example, the PSA educated the public about how to place brush & leaves in an area not affected by stormwater; to never place leaves in the street; and to remember that stormwater enters streams and lakes directly without being treated. The PSA can be viewed at: https://www.facebook.com/thecityofanniston/videos/810697249341609/.</p> <p>An educational message was posted on the County Recycling Facebook page notifying citizens of electronic recycling events and the location of recycling drop-offs. Copies of these messages are included in Appendix 1.A.</p>	<p>2/20/20-PSA Aired (city wide)</p> <p>Other educational messages posted:</p> <ul style="list-style-type: none"> • 5/7/19 • 6/7/19 • 8/15/19 • 12/13/19 	Same as current cycle
1.B Stormwater Webpage	<p>The City hosts a stormwater webpage that is linked to the City’s main website. The City’s webpage, which is 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 website analytical data (to document how many times the stormwater webpage was viewed) is included in Appendix 1.B. No complaints were reported through the website from citizens regarding illicit dumping, illicit discharges and E&S control violations.</p>	<p>Ongoing/as needed (city wide)</p> <p>The stormwater website had 1,224 views during the reporting year.</p>	Same as current cycle
1.C Utility Bill Header	<p>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.</p>	<p>Quarterly (all residential and commercial account holders)</p>	
1.D Student Education	<p>The City of Anniston partnered with the Calhoun County Extension, Choccolocco Creek Watershed, Anniston Water Works and Sewer Board and Tyler Union to teach approximately 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 Cane Creek Community Garden. Documentation of the event is included in</p>	<p>April 29 and 30, 2019</p> <p>Approximately 800 4th grade students. The students came from across Calhoun County, including multiple schools</p>	Same as current cycle

	Appendix 1.D and a newspaper article documenting the event, including photographs of students, can be viewed at https://www.annistonstar.com/news/photos-earth-day-field-trip/collection_7329525a-6b8d-11e9-99fa-a392758ef2dd.html#11 .	within the City of Anniston.	
1.E Citywide Cleanup	The City coordinated with Alabama People Against a Littered State (ALPALs) to host a cleanup event on Noble Street in downtown Anniston. Participants picked up 45 bags of litter and trash. Citizens also helped paint a City-owned building and assisted with City landscaping efforts. The event was advertised to the general public, and documentation is included in Appendix 1.E.	April 22, 2019 (31 volunteers).	Same as current cycle
1.F Storm Drain marking	This event was scheduled for January 15, 2020 and re-scheduled for March 11, 2020. Both events had to be cancelled because of inclement weather. Due to the COVID-19 pandemic, the City was unable to re-schedule the Storm Drain Marking event after the weather cancellations.	N/A	The City proposes to replace this BMP with the following BMP: Stormwater Information Booth. Educational handouts will be provided at an information booth that is set up at a community event held within the City of Anniston.
1.G Litter Reduction	The City operated a weekly litter reduction and pickup program with the aid of community service workers. 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, and the citywide cleanup. In addition, the following activities took place in the City that addressed litter reduction: <ul style="list-style-type: none"> • June 7 and December 13, 2019: An electronics recycling event was held. • Recycling notices were also posted to social media several times during the reporting period to encourage general recycling activities. • A permanent recycling bin located at 77 Justice Ave. Documentation of these educational activities is included in Appendix 1.A-1.E.	An estimated 193 community service hours were dedicated to litter pick up	Same as current cycle
1.H Public Input on SWMPP Materials	The City's webpage, which is 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 is included in Appendix 1.H. No comments were received on these materials during the reporting period.	Ongoing (city wide)	Same as current cycle

Additional Public Education Activities	The City maintains educational brochures in the lobby of the Public Works Department to help educate the public about water quality issues and how to prevent stormwater pollution. The brochures are replenished when needed. Copies of these brochures are provided in Appendix 1.I.	Various/Ongoing	
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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.

c. Proposed Changes to the SWMPP

There are no proposed changes to the SWMPP.

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 eleven (11) of the identified MS4 outfalls in February 2020 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. Photographs are also included. Three outfalls (A204, A205, and A208), located within close proximity to each other and with the same terrain, had dry weather flow. Field screening did not indicate the presence of any contaminants or evidence of an illicit discharge. It appears the flow originated from groundwater.	Same as current cycle
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 1,024 gallons of used oil during the reporting period.	Same as current cycle
2.C Citizen Complaint Program	<p>The City investigated citizen complaints and other stormwater issues and documented investigations and follow up activities in a stormwater tracking spreadsheet. Three citizen complaints were received and investigated during the reporting period (4/11/19; 5/1/19; & 3/17/20).</p> <p>Citizens may report a concern or stormwater complaint online via the City’s stormwater website located at http://www.anniston.al.gov/pages/?pageID=193 or by calling City Hall. The City advertises its website via an educational message posted on the City’s garbage bill, and encourages citizens to submit a complaint if they identify illicit discharges of chemicals or trash.</p> <p>A copy of the City’s tracking spreadsheet, screenshot of the City’s webpage, and sample garbage bill is provided in Appendix 2.C.</p>		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	Three outfalls identified during field activities were added to the City’s MS4 outfall map and inventory. Several	Same as current cycle

	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.	outfalls were also removed from the inventory b/c the City identified they were not located within the urbanized area of the City limits.	
2.E Illicit Discharge Enforcement	The City investigated multiple illicit discharge-related complaints and documented the complaints and follow up investigations in a spreadsheet or via other documentation maintained by the City's Code Enforcement Office (photographs and copies of citations).	See Appendix 2.E for documentation of investigations and enforcement.	Same as current cycle
2.F Illicit Discharge Ordinance	The Illicit Discharge regulations (Chapter 29 1/2, Section 8 of the City 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.	The City did not update the Illicit Discharge section of its Stormwater Management Ordinance during the reporting period.	Same as current cycle
2.G Employee Training	<p>Stormwater training was provided to Public Works employees on March 24, 2020. The following topics were emphasized during the meeting:</p> <ul style="list-style-type: none"> • Spill prevention • Proper cleaning techniques and spill notification procedures • Proper erosion and sedimentation practices and use of erosion control devices <p>A laminated glove box guide was provided for every public works department vehicle to help staff remember proper procedures to follow.</p>	A copy of the training sign in sheet and training materials is included in Appendix 2.G.	Same as current cycle

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 eight (8) 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.

c. Proposed Changes to the SWMPP

There are no proposed changes to the SWMPP.

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 Erosion and Sedimentation (E&S) Control Regulations	The E&S regulations (Chapter 29 ½, Section 5 of the City’s Stormwater Management Ordinance) are evaluated on a yearly basis to see what modifications or changes may be needed.	<p>The City updated the general performance standards section of the Stormwater Management Ordinance during the reporting period to stipulate that the standards apply to construction sites that create impervious surfaces equal or greater than 0.5 acres. A copy of the updated ordinance is included in Appendix 2.F.</p> <p>The City is in the process of also updating the E&S requirements 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.</p>	The City will finalize the adoption of a revised Stormwater Management Ordinance that references the most updated edition of the Alabama Handbook.
3.B Qualified Credentialed Inspector (QCI) Program	Lance Armbruster, who implements many aspects of this program for the City, is a Professional Engineer and Qualified Credential Professional. During the reporting period, a City employee took the initial QCI training course during the reporting period. A copy of the training certification is included in Appendix 3.B.	N/A	Same as current cycle
3.C E&S Inspections	<p>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.</p> <p>Results of construction site inspections are documented in a comprehensive summary spreadsheet that lists the identified deficiencies or violations, follow-up actions, and enforcement actions taken.</p>	A copy of the City’s Stormwater Tracking Database/summary site inspection spreadsheet and site inspection checklist is included in Appendix 3.C. Copies of individual inspection checklists are maintained by the City. Due to the large number of records, copies of completed inspection checklists are not included in the Appendix but they may be provided upon request.	Same as current cycle

3.D ESCP Review	<p>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 does not issue LDPs until it is established that the ESCP is consistent with City requirements. The City uses a Site Development Plan Checklist as part of its review procedures. A copy of the checklist is included in Appendix 3.D.</p>	<p>The City reviewed nine (9) site plans during the reporting period. Three (3) LDPs were issued during the reporting period. A database summarizing site plan reviews is included in Appendix 3.D.</p>	Same as current cycle
3.E. ADEM Notification	<p>The City maintains comprehensive documentation of stormwater issues, including illicit discharges and E&S related problems, and submits documentation and information to ADEM as needed regarding issues and violations.</p>	<p>The City did not notify ADEM of any E&S issues during the reporting period. There were no issues that required notification to ADEM. A copy of the tracking database that the City uses to track inspection, issues and any enforcement for stormwater issues is included in Appendix 3.E.</p>	Same as current cycle
3.F Enforcement and 3.G Enforcement Tracking Database	<p>The City's Erosion and Sediment Control regulations provide the City with the authority to take escalating enforcement measures, including written warning letters and stop work orders, if construction sites do not comply with the requirements of the Alabama Handbook.</p> <p>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.</p>	<p>A copy of the City's tracking database and enforcement activity records is included in Appendix 3.F_3.G.</p>	

3.H Construction Site Pollution Control	The City's 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(5)(r) of these regulations currently requires ESCP plans to include the following: "A description of onsite measures to control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site."	A copy of the City's ordinance is included in Appendix 3.H. No changes were made to the ordinance requirements for controlling construction site debris. Please see 3.A above for more information about future ordinance updates.	Same as current cycle
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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.

c. Proposed Changes to the SWMPP

There are no proposed changes to the SWMPP.

**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 Management Ordinance	Post Construction standards are specified within the City’s Stormwater Management Ordinance (Chapter 29 ½, Section 6 of the City code). The City reviewed its current Stormwater Management Ordinance to determine if updates needed to be made to the post construction standards.	<p>The City did not update the post construction section (Section 6) of its Stormwater Management Ordinance during the reporting period.</p> <p>The City is in the process of updating the Stormwater Management Ordinance 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.</p>	The City will finalize the adoption of a revised Stormwater Management Ordinance that references the most updated edition of the Alabama Handbook.
4.B 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.	<p>The City is in the process of updating the Stormwater Management Ordinance 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. The proposed language has been submitted to Council, but due to the COVID-19 pandemic, the City has not yet been able to meet and adopt the revised ordinance.</p>	The City will finalize the adoption of a revised Stormwater Management Ordinance that references the most updated edition of the Alabama Handbook.

4.C Site Plan Reviews	<p>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 compliance with the standards set forth in the City’s Stormwater Management Ordinance.</p>	<p>The City reviewed nine (9) site plans during the reporting period. Three (3) LDPs were issued during the reporting period. A database summarizing site plan reviews and a copy of the checklist used to document the reviews is included in Appendix 4.C.</p>	Same as current cycle
4.D Privately-Owned Structural BMP Inspection and Maintenance Program	<p>The City updated its 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 ten (10) private ponds at 9 privately-owned sites and three (3) ponds owned by Calhoun County. The City documented the results of the inspections, including recommendations made to correct any noted deficiencies. One (1) new maintenance agreement was executed during the reporting period. The City’s inventory, inspection checklists, and new maintenance agreement are provided in Appendix 4.D.</p>	Same as current cycle
4.E City Owned/Operated Structural BMP Maintenance	<p>The City maintains an updated 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>	Same as current cycle
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 ordinances or codes.</p>	Same as current cycle

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 five (5) 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.

c. Proposed Changes to the SWMPP

There are no proposed changes to the SWMPP.

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 Municipal Facility Inspections	City staff performed stormwater site inspections for the following eight (8) City facilities during this permit period: one (1) 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 5.A.	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	Stormwater training was provided to Public Works employees on March 24, 2020. The following topics were emphasized during the meeting: <ul style="list-style-type: none"> • Spill prevention • Proper cleaning techniques and spill notification procedures • Proper erosion and sedimentation practices and use of erosion control devices A laminated glove box guide was provided for every public works department vehicle to help staff remember proper procedures to follow.	A copy of the training sign in sheet and training materials is included in Appendix 5.B.	Same as current cycle
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	Street sweeping was performed on a continuous, daily basis. The route included all City streets with curb and gutter.	The street sweeper operated an estimated 1,230 hours by a dedicated employee during the reporting period.	Same as current cycle
5.E MS4 Maintenance Program	<p>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 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>The City also replaced 70 feet of collapsed concrete ditch near 230 West 14th Street and installed 100 feet of 48 inch RCP at 1912 Valley Creek Road to prevent bank collapse and erosion.</p>		Same as current cycle

6. Impaired Waters Monitoring Plan

Based on the 2020 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). The City developed an Impaired Waters Monitoring Plan in 2019 and submitted a copy of the draft plan with the City’s 2018-2019 Annual Report. 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 and submitted those results with the 2018 – 2019 Annual Report. During the current reporting period, water quality sampling was conducted at two (2) locations on Cane Creek. One sampling event was conducted on September 12, 2019 and the second sampling event was conducted on February 4, 2020.

Copies of analytical results are provided in Appendix 6, and summarized below. For both the February 2019 and February 2020 sampling events, the results were below the water quality criteria established by ADEM for the designated use of Fish and Wildlife for non-coastal waters (maximum of 2,507 colonies/100 ml and maximum of 298 colonies/100 ml for incidental and whole body water contact). The bacterial count results for the September 12, 2019 were reported by the “Most Probable Number”, or MPN , by the laboratory, which is a different unit of measurement than the number of colonies per 100 ml; therefore, the results cannot be compared equally to the water quality limits established by ADEM. The City plans to report future sampling events by the number of bacteria colonies per 100 ml of water in order to compare the results to ADEM’s water quality standards.

Date	Sampling Location CC-1 (Iron Mountain Road) Results	Sampling Location CC-2 (Woodland Park) Results
Previous Reporting Period		
2/5/19	100 #cols/100 ml	350 #cols/100 ml
Current Reporting Period (2019 – 2020)		
9/12/19	260.3 (Raw=MPN) (a)	148.3 (Raw=MPN) (a)
2/4/20	70 #cols/100 ml	160 #cols/100 ml

a/Results reported in “Most Probable Number” (MPN). This is a measurement of the statistical probability of the number of bacteria, and may not correlate equally with results reported by the number of colonies (# cols/100 ml).