



CITY OF ANNISTON

NPDES PHASE II MS4 ANNUAL REPORT

Reporting Period: April 1, 2020 –March 31, 2021

Submitted To:

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

May 31, 2021

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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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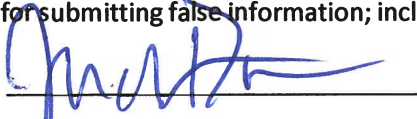
Certifying Official

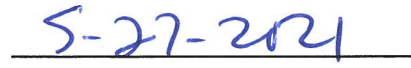
All notices of intent, reports, certifications, or information submitted to the Department, or other information, should be signed and certified in accordance with Part VII.G of the facility's Phase II Stormwater Permit. The certifying official for this Annual Report and a Principal Executive Officer 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, 2020 – March 31, 2021.

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 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 2017-2018 and 2018-2019 reporting period and these changes were detailed in the Annual Reports for those reporting years. The City also updated its SWMPP in the 2019-2020 reporting period and submitted a complete copy of the revised plan to ADEM for review.

Overall, the City feels that the SWMPP 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 SWMPP as well as the protection of their local water resources. This included the implementation of seven (7) Best Management Practice (BMP) recommendations. Additional public educational activities also took place in the City of Anniston that exceeded the SWMPP 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.

c. Proposed Changes to the SWMPP

There are no proposed changes to the SWMPP.

**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 3/15/21 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</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>3/15/21-PSA Aired (city wide)</p> <p>Other educational messages posted:</p> <ul style="list-style-type: none"> • 2/8/21 • 6/14/20 • 6/8/20 • 5/20/20 	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 https://www.anniston.al.gov/storm-water-management-program/ was reviewed and updated with relevant information on stormwater content during the reporting period. The webpage was also 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.</p> <p>Five (5) complaints were received from citizens regarding illicit dumping, illicit discharges and E&S control violations. See Appendix 1.B for documentation of investigations and enforcement.</p>	<p>Ongoing/as needed (city wide)</p> <p>The stormwater website had 110 views during the reporting year.</p> <p>Five (5) complaints were received from citizens regarding illicit dumping, illicit discharges and E&S control violations.</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>	Quarterly (all residential and commercial account holders)	Same as current cycle
1.D Student Education	<p>The Annual Earth Day Event, hosted by the Calhoun County Extension Service, was canceled during the 2020-2021 reporting period due to statewide COVID-19 restrictions. Based on local restrictions in place throughout the reporting year no formal student education event was held. However, other public education & involvement events still took place during the reporting period and educational information is available on the City’s website.</p>	N/A	Same as current cycle

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

1.E Citywide Cleanup	The City coordinated with a local volunteer group, Anniston Changers, to host multiple cleanup events throughout the city. Participants picked up over 10 tons of litter and trash. Citizens also assisted with City landscaping efforts. The events were advertised to the general public, and documentation is included in Appendix 1.E.	Clean up events: <ul style="list-style-type: none"> • 10/17/2020 • 11/21/2020 • 01/16/2021 • 02/20/2021 • 03/20/2021 	Same as current cycle
1.F Public Information Booth	Due to the COVID-19 pandemic, the City was unable to host a Public Information Booth at any public event. However, other public education & involvement events still took place during the reporting period and educational information is available on the City's website.	N/A	Same as current cycle
1.G Litter Reduction	<p>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, and citywide cleanups.</p> <p>In addition, the following activities took place in the City that addressed litter reduction:</p> <ul style="list-style-type: none"> • June 14, 2020 and February 10, 2021: 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. <p>Documentation of these educational activities is included in Appendix 1.A-1.E.</p>	An estimated 2600 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 https://www.anniston.al.gov/storm-water-management-program/ 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	Educational brochures were maintained 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 were replenished when needed.	Ongoing (city wide)	N/A

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 seven (7) 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	<p>The City screened a total of nine (9) outfalls in January-March 2021 in accordance with the dry weather screening protocols the City has implemented to identify and eliminate illicit discharges.</p> <p>Screening activities were documented on inspection sheets, copies of which are included in Appendix 2.A. Photographs are also included.</p>	<p>Seven (7) outfalls previously listed on the City's outfall inventory were screened during the reporting period as well as two (2) new outfalls that were identified while in the field (A213 & A214) that were added to the City's outfall inventory. Dry weather flow was identified at 2 outfalls (A005 & A018) but based on field observations and source tracking, the flow was found to originate from stormwater discharge of private facility ponds and not the result of an illicit discharge. An additional outfall (A034) had dry weather flow and was screened. This outfall appeared to indicate a possible illicit discharge but a source of the pollutant could not be immediately located. This outfall was reinspected and did not indicate presence of a pollutant discharge or flow.</p>	<p>The City is in the process of updating its storm sewer inventory to include additional outfalls and/or removing currently-listed outfalls upon field verification. The inventory map is updated on an ongoing basis and an updated copy is included in Appendix 2.D.</p>
2.B Used Oil Recycling	<p>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.</p>	<p>The City recycled 935 gallons of used oil during the reporting period. Documentation is included in Appendix 2.B.</p>	<p>Same as current cycle</p>
2.C Citizen Complaint Program	<p>Citizens may report a concern or stormwater complaint online via the City's stormwater website located at https://www.anniston.al.gov/stormwater/ 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>The City investigated citizen complaints and other stormwater issues and documented investigations and follow up activities in a stormwater tracking spreadsheet. 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>		<p>Same as current cycle</p>

Table 2
MCM #2
Illicit Discharge Detection and Elimination Program (IDDE)
Part III.B.2

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.	Two outfalls identified during field activities (A213 & A214) were added to the City's MS4 outfall map and inventory.	The City is in the process of updating its storm sewer inventory to include additional outfalls and/or removing currently-listed outfalls upon field verification.
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>1) A SWMP Training & GIS Database Management meeting was held with City supervisory staff in attendance to review the use of GIS to track fieldwork, SWMP requirements, best management practices, & SOPS.</p> <p>2) Stormwater training was provided to Public Works and Parks and Recreation employees on March 30, 2021. The following topics were emphasized during the meeting:</p> <ul style="list-style-type: none"> a. Pollution Prevention Measures b. Water Quality c. Spill Response d. Proper erosion and sedimentation practices and use of erosion control devices <p>Training documentation is provided in 2.G.</p>	<p>1) 3/4/21-Training with City supervisory staff (5 participants)</p> <p>2) 3/20/21- Training with City supervisory & field staff (9 participants)</p>	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 3: 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.	The City updated the stormwater system design and management standards section of the Stormwater Management Ordinance during the reporting period to reference the most updated edition of the Alabama Handbook for Erosion Control, Sediment Control and Stormwater Management on Construction Sites and Urban Areas. A copy of the updated ordinance is included in Appendix 3.A.	Same as current cycle
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 QCI Online Refresher Training. A copy of the training certification is included in Appendix 3.B.	Certificate of completion granted to Michael Branton Cole, Anniston Engineering Department, is included in Appendix 3.B.	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. 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.	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	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.	The City reviewed seventeen (17) site plans for different facilities during the reporting period. Site plan reviews were also repeated for three facilities during the reporting period. Five (5) LDPs were issued during the reporting period. A database summarizing site plan reviews is included in Appendix 3.D.	Same as current cycle

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

3.E. ADEM Notification	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.	The City notified ADEM of three separate IDDE and E&S complaints during the reporting period. 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.	Same as current cycle
3.F Enforcement 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>	A copy of the City's tracking database and enforcement activity records is included in Appendix 3.F & 3.G.	Same as current cycle
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

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.	The City did not update the post construction section (Section 6) of its Stormwater Management Ordinance during the reporting period.	Same as current cycle
4.B Stormwater Design Manual	The City adopted as its stormwater design and BMP manual the most current edition of the 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.	A copy of the updated ordinance is included in Appendix 4.B.	Same as current cycle
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 compliance with the standards set forth in the City's Stormwater Management Ordinance.	The City reviewed seventeen (17) site plans during the reporting period. Five (5) LDPs were issued during the reporting period. A database summarizing site plan reviews is included in Appendix 4.C.	Same as current cycle

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

<p>4.D Privately-Owned Structural BMP Inspection and Maintenance Program</p>	<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 nine (9) private ponds at 7 privately-owned sites and two (2) ponds owned by Calhoun County. The City documented the results of the inspections, including recommendations made to correct any noted deficiencies.</p> <p>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>	<p>Same as current cycle</p>
<p>4.E City Owned/Operated Structural BMP Maintenance</p>	<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.</p> <p>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>
<p>4.F Green Infrastructure Ordinance Review</p>	<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>	<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 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 Inventory and Inspections	<p>The City updated its inventory of municipal facilities. The City inspected these facilities and completed checklists to document the inspection results (see Appendix 5.A for inspection records).</p> <p>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; these checklists are included in Appendix 5.A.</p>	<p>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; these checklists are included in Appendix 5.A.</p> <p>A few minor housekeeping issues were identified that will be corrected including some potential exposure of pollutants to runoff located at the Street Department Armory. Some discoloration was noted near the stormwater drainage grate at this facility that indicated parking lot runoff collected and drained offsite. These issues were discussed with on-site personnel.</p>	Same as current cycle
5.B City Employee Training	<p>1) A SWMP Training & GIS Database Management meeting was held with City supervisory staff in attendance to review the use of GIS to track fieldwork, SWMP requirements, best management practices, & SOPS.</p> <p>2) Stormwater training was provided to Public Works and Parks and Recreation employees on March 30, 2021. The following topics were emphasized during the meeting:</p> <ul style="list-style-type: none"> e. Pollution Prevention Measures f. Water Quality g. Spill Response h. Proper erosion and sedimentation practices and use of erosion control devices <p>Training documentation is provided in 5.B.</p>	<p>3) 3/4/21-Training with City supervisory staff (5 participants)</p> <p>3/20/21- Training with City supervisory & field staff (9 participants)</p> <p>A copy of the training sign in sheet and training materials is included in Appendix 5.B.</p>	Same as current cycle

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

5.C De-Icing Program	<p>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.</p> <p>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.</p>	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. 70 work orders were completed related to the drainage network that included inlet repair, sediment removal, and debris removal. A copy of the work orders may be provided to ADEM upon request.</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>	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 2019 and submitted the results with the 2018 – 2019 and 2019-2020 Annual Reports.

Copies of analytical results are provided in Appendix 6, and summarized below. The September 2020 sampling event that occurred at CC-2 (Woodland Park) was above 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). ADEM personnel were notified of the results and recommended that the City conduct additional testing along Cane Creek to identify a source. Based on these recommendations, two intermediate sampling locations, CC-3 and CC-4, were "added" and tested in order to narrow down a point source that may be contributing to the elevated results.

Additional testing was conducted for three consecutive weeks starting on 10/27/2020 running through 11/9/2020. The October testing identified elevated E.Coli concentrations in Cane creek; subsequent November testing identified normal levels of bacteria, indicating the source of pollutant was diminished. It was noted that in the days preceding the 10/27/2020 results, the City received approximately 2 inches of rain. The city has added a rain gauge to a nearby location to help track future rain events in correlation with grab samples at Cane Creek:

<https://ambientweather.net/dashboard/ee1be21bc55b377defca227798738168>

ADEM was contacted on 12/11/2020 to discuss results and suggested that the City notify the Anniston Water Works & Sewer Board (AWWSB) of the issue and document the communication. Written notification and sampling results were sent to AWWSB on 1/12/2020. The City advised AWWSB to evaluate their sanitary sewer network in the area. Further testing was conducted on 3/3/2021 at the routine sampling locations to verify no additional pollutants were entering the system along the impaired waterway within City limits. Results from the final sampling event produced significantly lower water quality impairments.

A series of maps that displays the results, starting with the results of the routine sampling, is included in Appendix 6.

Date	Sampling Location CC-1 (Iron Mountain Road) Results	Sampling Location CC-2 (Woodland Park) Results		
Previous Reporting Period (2018 – 2019)				
2/5/19	100 #cols/100 ml	350 #cols/100 ml		
Previous Reporting Period (2019 – 2020)				
9/12/19	260 MPN ^A	148 MPN ^A		
2/4/20	70 #cols/100 ml	160 #cols/100 ml		
Current Reporting Period (2020 – 2021)				
Date	Sampling Location CC-1 (Iron Mountain Road) Results	Sampling Location CC-2 (Woodland Park) Results	Sampling Location CC-3 Results	Sampling Location CC-4 Results
9/22/20	290 #cols/100 ml	3,200 #cols/100 ml	NA	NA
10/27/20	2,100 #cols/100 ml	9,100 #cols/100 ml	5,500 #cols/100 ml	6,100 #cols/100 ml
11/2/20	210 #cols/100 ml	380 #cols/100 ml	250 #cols/100 ml	240 #cols/100 ml
11/9/20	190 #cols/100 ml	380 #cols/100 ml	220 #cols/100 ml	260 #cols/100 ml
3/3/21	10 #cols/100 ml	10 #cols/100 ml	NA	NA

^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).