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# City of Prattville

101 West Main Street  
Prattville, Alabama 36067



# Municipal Separate Storm Sewer System (MS4) 2019 Annual Report

NPDES Permit No. ALS000010

January 2020

Prepared By:



2124 Moore's Mill Road ♦ Suite 120 ♦ Auburn, Alabama 36830

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# SECTION 1

General Information



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# 1. General Information

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## 1.1. Signatory Requirements

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information 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.

Bill Gillespie, Jr.  
Name

*Bill Gillespie, Jr.*  
Signature

Mayor  
Title

16 / Jan / 2020  
Date

Address: 101 West Main Street  
Prattville, AL 36067  
Phone: (334) 595-0101





## 1.2. List of Contacts

Part IV.4 of National Pollutant Discharge Elimination Systems (NPDES) Permit Number ALS000010 requires the Permittee to provide a list of contacts and responsible parties (e.g. agency, name, phone number) that had input to and are responsible for the preparation of the annual report. City Staff from Administration, Public Works, Engineering Services, General Government, Public Safety, and Performing Creative Arts and Recreation contributed materials and data for incorporation into this annual report.

Personnel directly responsible for the preparation of this annual report include the following.

### Contact List:

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Auburn, AL 36830  
(334) 740-6000

Any questions concerning the City of Prattville's (City) Municipal Separate Storm Sewer System (MS4) 2019 Annual Report shall be directed to Mr. Jonathan Larkin.

## 1.3. Overview and Summary

In 1990, the U.S. Environmental Protection Agency (EPA) promulgated regulations establishing Phase I of the National Pollutant Discharge Elimination Systems (NPDES) storm water program. The Phase I program for municipal separate storm sewer systems (MS4s) requires operators of "medium" and "large" MS4s that generally serve populations of 100,000 or greater to implement a storm water management program as a means to control polluted discharges from certain municipal, industrial and construction activities into the MS4.

In 1999, EPA promulgated regulations establishing Phase II of the NPDES storm water program. The Phase II program extends coverage of the NPDES storm



water program to regulated “small” MS4s. A regulated “small” MS4 is defined as an MS4 located within an “urbanized area” as defined by the Census Bureau or as designated by the NPDES permitting authority.

The Alabama Department of Environmental Management (ADEM) presently has primary jurisdiction over permitting and enforcement of the Storm Water Program for Alabama. On 17 June 2016, ADEM issued MS4 Phase II Individual Permit (NPDES Number ALS000010) for storm water discharges associated with the City’s MS4. The City’s NPDES Permit became effective on 1 July 2016 and will expire on 30 June 2021.

The City’s SWMP has been developed to include the storm water pollution prevention and management programs described in the NPDES Permit. Part II.B of the NPDES Permit describes five (5) program elements that are required to be incorporated in the City’s SWMP:

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

This annual report summarizes the City’s efforts for the reporting period from 1 October 2018 through 30 September 2019 to comply with the NPDES Permit and the above listed five (5) program elements to the maximum extent practicable.

#### **1.4. MS4 Area**

The City of Prattville is located in the central part of the state along the Alabama River in Autauga and Elmore Counties. The City occupies approximately 34.60 square miles and is bordered on the east by the City of Millbrook. Approximately 17.79 square miles (51.9%) of the City is located within Montgomery, Alabama Urbanized Area as defined by 2010 Census. Areas of the City located within the Urbanized Area is the City’s regulated MS4 area.

The Alabama Department of Transportation (ALDOT) MS4 extends through the City’s MS4 Area. As a result, ALDOT is responsible for activities within their MS4.

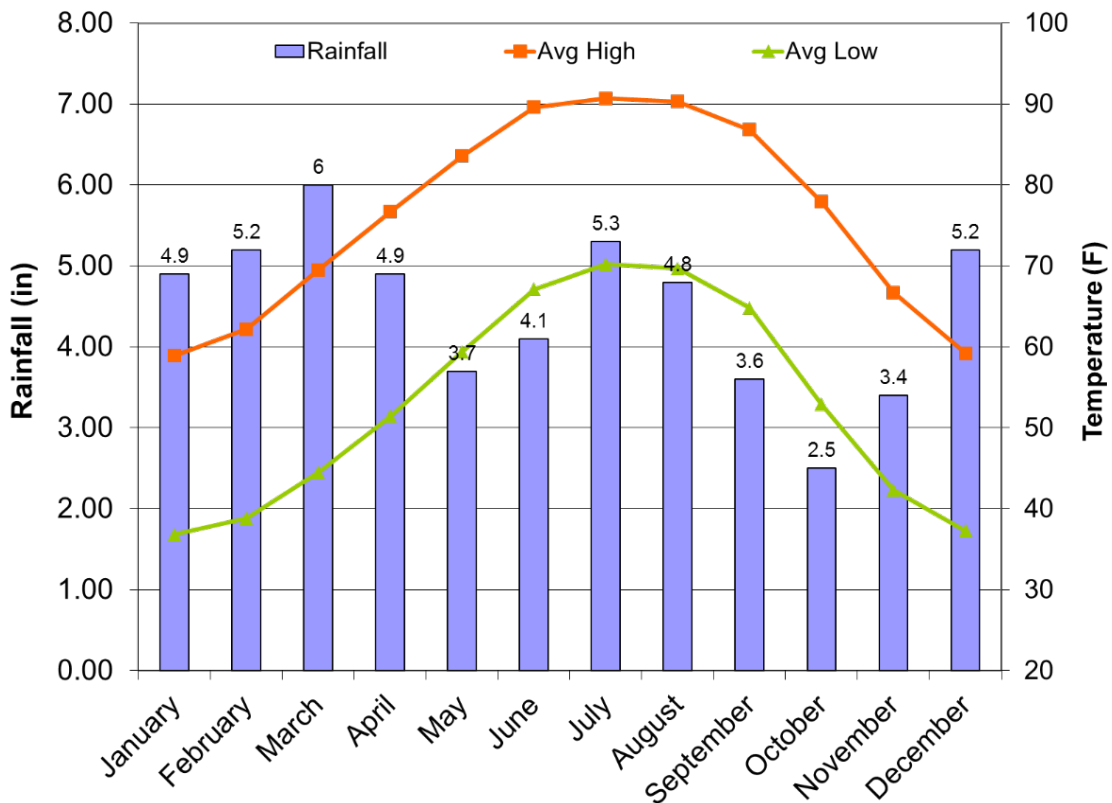
The City’s corporate limits, MS4 Area, Autauga and Elmore City boundaries, major roads, major streams, and surrounding communities are presented in Figure 1.2.



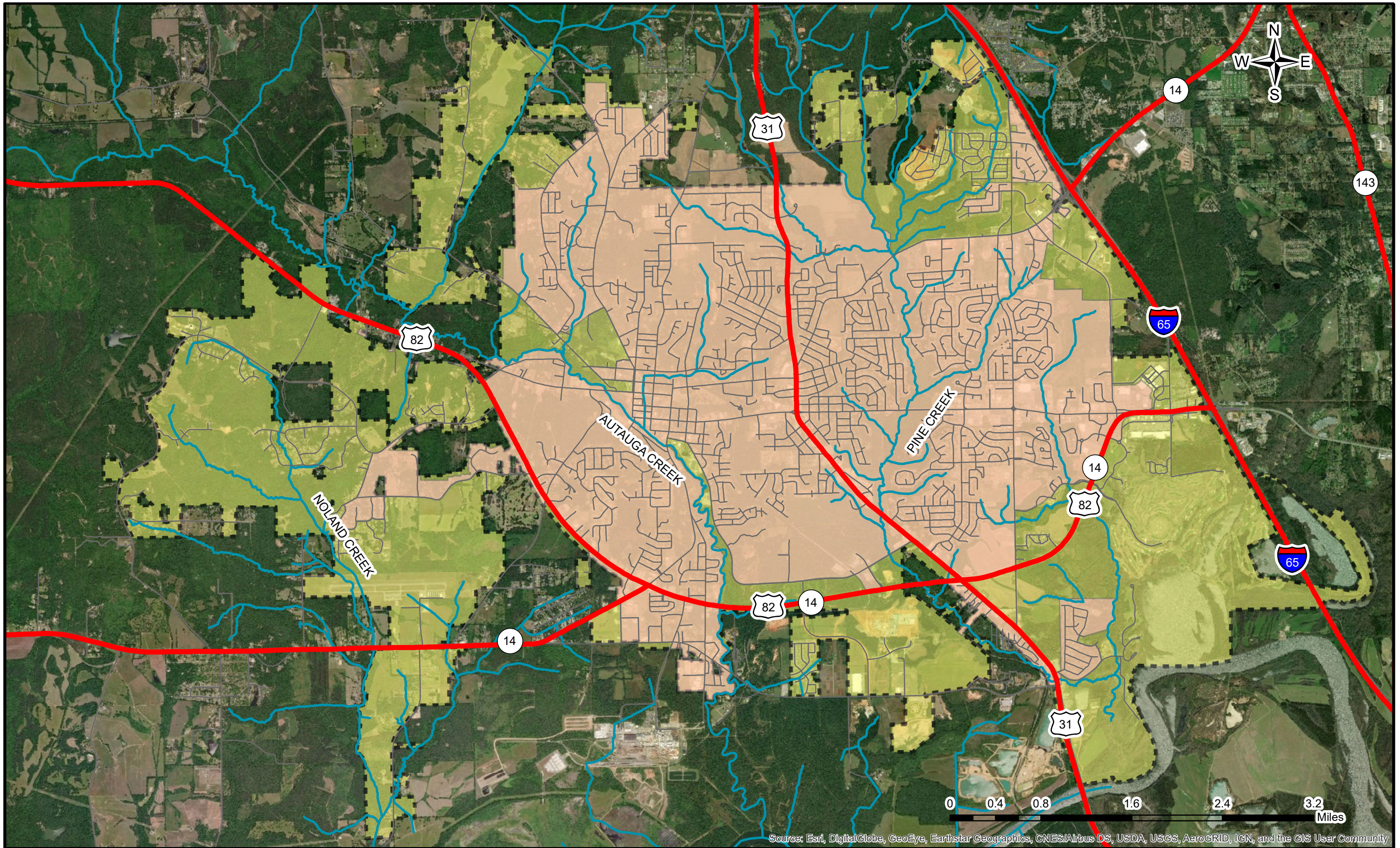
### 1.4.1. Climate

The City has a humid subtropical climate, with short mild winters, warm springs and autumns, and long, hot, humid summers. Winter temperatures average 47.9°F in January with lows rarely dipping below 20°F. Summer temperatures average 80.4°F in July with highs exceeding 90°F for more than 72 days per year. The City receives approximately 53.6 inches of rainfall annually. Rainfall tends to be evenly distributed throughout the year with dryer periods occurring during late summer and early fall. Light snowfall occurs in some winters. Average monthly rainfall and temperature are summarized in Figure 1.1. Significant snow fall events are rare in the City.

**Figure 1.1 Average Rainfall and Temperatures**







Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community



Prattville City Limits	Prattville MS4 Area	Streams
ALDOT Roads	Streets	



**CITY OF PRATTVILLE**  
City of Prattville MS4

Figure 1-2  
September 2019



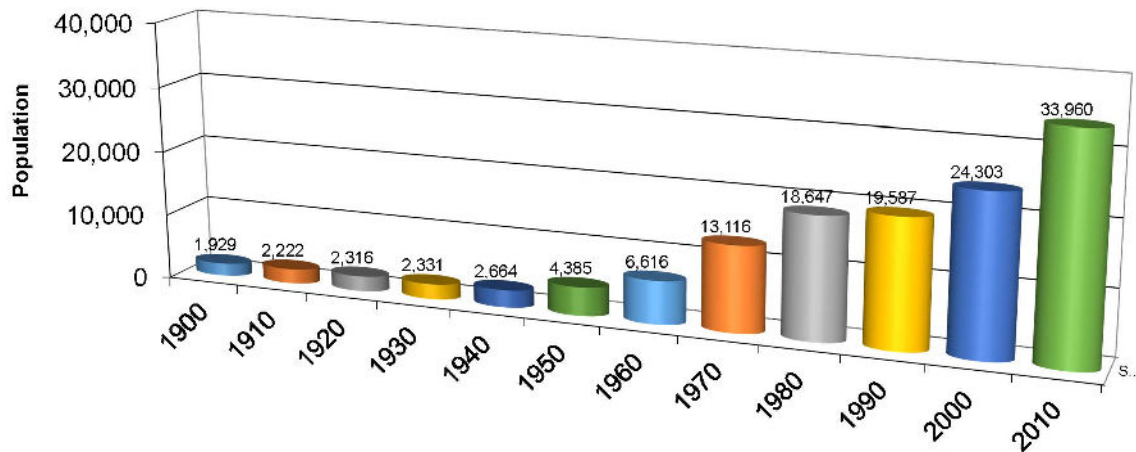


### 1.4.2. Population

Since the City was incorporated in 1839, the City experienced a small increase in population until 1960. From 1960 to 2010, the City experienced a significant population growth. Figure 1.3 provides a graph showing the historical population of the City since 1900.

The 2010 Census estimated the total population of the City to be 33,960. As compared to the population in 2000 of 24,303, the City experienced a population increase of 9,657 (approximately 39.7%) over the past 10 years.

**Figure 1.3 Historical Population**

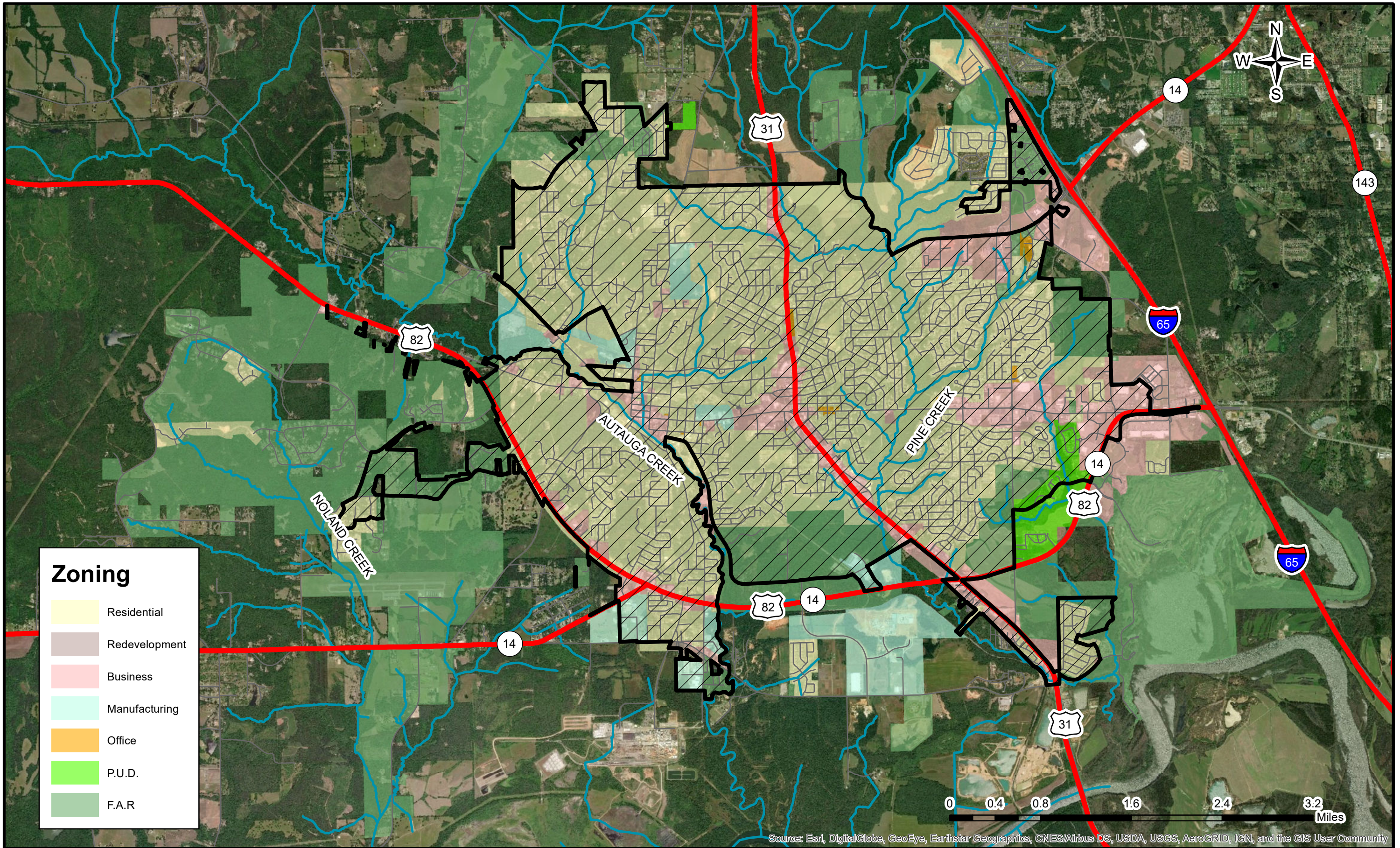


### 1.4.3. Land Use

The City utilizes various zoning districts for the development of land within the City. These zoning categories have been generalized into residential, redevelopment, business, manufacturing, office, planned unit development, and agricultural districts. A summary of the zoning districts is summarized in Table 1.1 and shown in Figure 1.4.

Overlapping the land use with watershed boundaries help the City to identify and implement Best Management Practices (BMPs) targeted to improve water quality.





Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

**Zoning**

- Residential
- Redevelopment
- Business
- Manufacturing
- Office
- P.U.D.
- F.A.R.

- Prattville MS4 Area
- Streets
- ALDOT Roads
- Streams



**CITY OF PRATTVILLE**  
Land Use Summary

Figure 1-4  
September 2019







**Table 1.1 Zoning Districts**

District	City		MS4 Area	
	Area (mi <sup>2</sup> )	Area (%)	Area (mi <sup>2</sup> )	Area (%)
Residential	14.695	42.5	12.615	70.9
Redevelopment	0.028	0.1	0.022	0.1
Business	3.501	10.1	2.199	12.4
Manufacturing	1.566	4.5	0.465	2.6
Office	0.059	0.2	0.058	0.3
Planned Unit Development	0.483	1.4	0.170	1.0
Agriculture	14.271	41.2	2.251	12.7
Total	34.603	100.0	17.781	100.0

## 1.5. Known Problems

According to ADEM's 2018 303(d) list, there are no streams within the City that have been designated as impaired. Additionally, there are no streams with EPA approved Total Maximum Daily Loads (TMDLs) located within the City.



## SECTION 2

Program Evaluation





## 2. Program Evaluation

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### 2.1. Program Objectives

The primary objective of the SWMP is to effectively prohibit the discharge of non-storm water discharges into the MS4 and reduce the discharge of pollutants from the MS4 to the MEP. The City has implemented, maintained, and revised the SWMP as necessary to comply with the requirements of the NPDES permit.

The City has made significant progress over the past year in developing and implementing its SWMP to the MEP. Major accomplishments are summarized below.

### 2.2. ADEM Audit

ADEM conducted an audit of the City's MS4 program on 7 March 2019. ADEM's audit findings confirmed that the City has developed and implemented a satisfactory SWMP and is compliant with the NPDES permit. A list of personnel participating in the audit and the ADEM Audit Report are provided in Appendix A.

### 2.3. Public Education

The MS4 NPDES permit requires the City to develop, implement, and evaluate a public education and public involvement program. Goals of the program are to:

- Educate the community about the impacts of storm water discharges into streams, rivers, lakes, and ponds;
- Identify steps that the community can take to help reduce pollutants in storm water runoff;
- Provide opportunities for public input and feedback;
- Engage the public to actively participate; and,
- Facilitate opportunities to provide public education.

As the public gains a greater understanding of the benefits of a storm water program, the City is likely to gain more support for the SWMP and increased compliance with the NPDES permit requirements. Public education and public involvement provide a mechanism to help the public understand how their actions can potentially impact storm water quality. Public participation can also help



reduce the amount of pollution generated and identify potential pollution causing activities and/or sources.

The City has utilized a variety of techniques to inform its citizens about activities that are occurring throughout the City as well as provide information to help educate the local community on how to protect water resources. At a minimum, the City's SWMP Plan committed to performing one public education BMP during each permit year. Activities utilized by the City during this permit year are summarized in the following sections.

### **2.3.1. Local Partnerships**

The City has formed partnerships with local and statewide organizations to capitalize on education materials and programs that have already been developed. Ongoing activities with partnership organizations that supports the City's SWMP include the following:

Autauga Creek Improvement Committee (ACIC)

[www.autaugacreek.org](http://www.autaugacreek.org)

- City provides links to organization on website; and,
- Maintains Canoe Trail Park.

Alabama Cooperative Extension System (ACES)

[www.offices.aces.edu/autauga/](http://www.offices.aces.edu/autauga/)

- Water Festival organization.

Alabama Soil and Water Conservation Committee (ASWCC)

[www.alconsevationdistricts.gov](http://www.alconsevationdistricts.gov)

- ASWCC provides the City with technical resources to support various program components.

ADEM

[www.adem.state.al.us](http://www.adem.state.al.us)

- Coordinate on non-storm water discharge investigations.

The City's contributions to the above referenced organizations may include but are not limited to staff participation, financial contributions, land contributions, and/or technical assistance. Additional educational activities performed by each entity are further documented on their website.



### 2.3.2. Website

The City has developed a website (<http://www.prattvilleal.gov/>) that provides a lot of information about the City. It also provides some general information regarding what the public can do to help minimize pollution and how to protect the quality of stormwater runoff. Some topics provided on the website include but are not limited to the following:

- Storm Water Management Program
  - NPDES Permit ALS000010
  - SWMP Plan
  - Annual Report(s)
- Stormwater Resources
  - Erosion and Sediment Control
  - Post Construction Stormwater Runoff
  - How Can YOU Prevent Stormwater Pollution?
  - EPA Educational Materials
  - Brochures, guides, and booklets
- Sanitation
  - Household garbage collection
  - Yard trash collection
  - “Garbage Can Tips” Public Service Announcement
  - Recycling Center and information
  - Hazardous Waste Disposal
    - Household Cleaner Alternatives
    - Gardening and Pest Control Alternatives
- Wastewater
  - Recycling Grease
- Building Department
  - Codes and Permits
  - Development Forms
- Floodplain Management

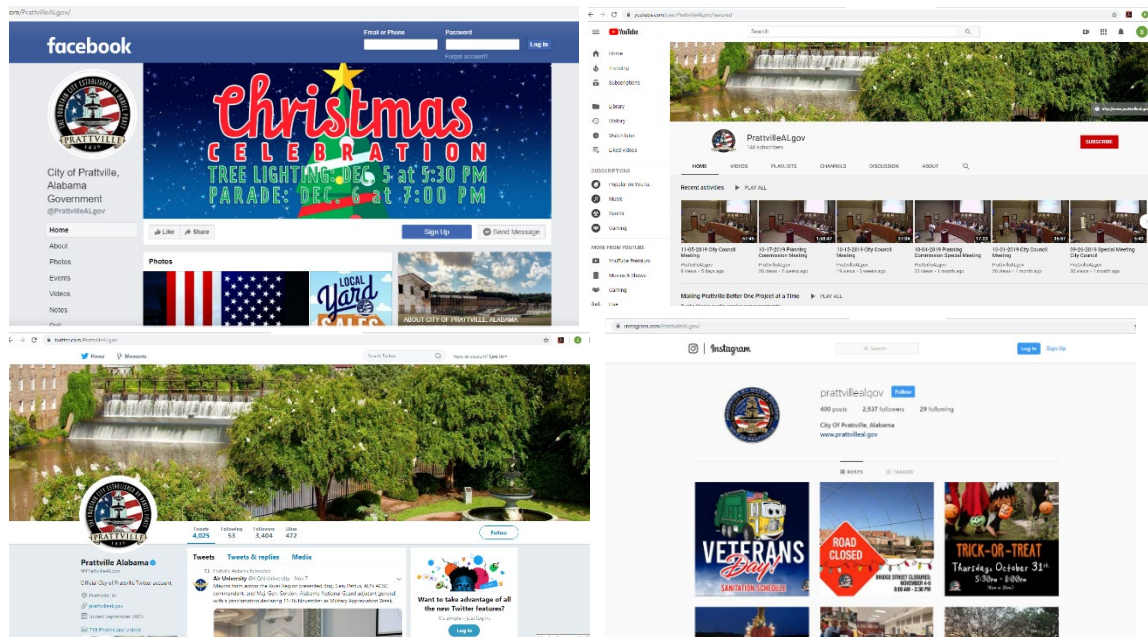
Through the website, citizens are provided access to the City’s regulations, ordinances, permitting requirements, and a variety of other information. The website is maintained and updated on an as needed basis. Screen shots of selected pages are included in Appendix B.



### 2.3.3. Social Media

The City is active on several social media platforms. This allows the City the opportunity to send direct messages in a timely manner to residents, businesses, property owners, and others actively following the City on these platforms. This offers a cost effective, environmentally friendly mechanism to potentially inform the public regarding storm water related issues. Selected screenshots of the City's social media sites are provided in Figure 2.1.

Figure 2.1 City Social Media Pages



The City currently maintains the following social media platforms.

Facebook: <https://www.facebook.com/PrattvilleALgov/>

- 23,920 Followers
- 23,970 “Likes”

Twitter: <https://twitter.com/PrattvilleALgov>

- 3,404 Followers
- 4,025 Tweets

YouTube: <https://www.youtube.com/user/PrattvilleALgov/>

- 146 Subscribers
- 63,034 Views since 24 September 2009

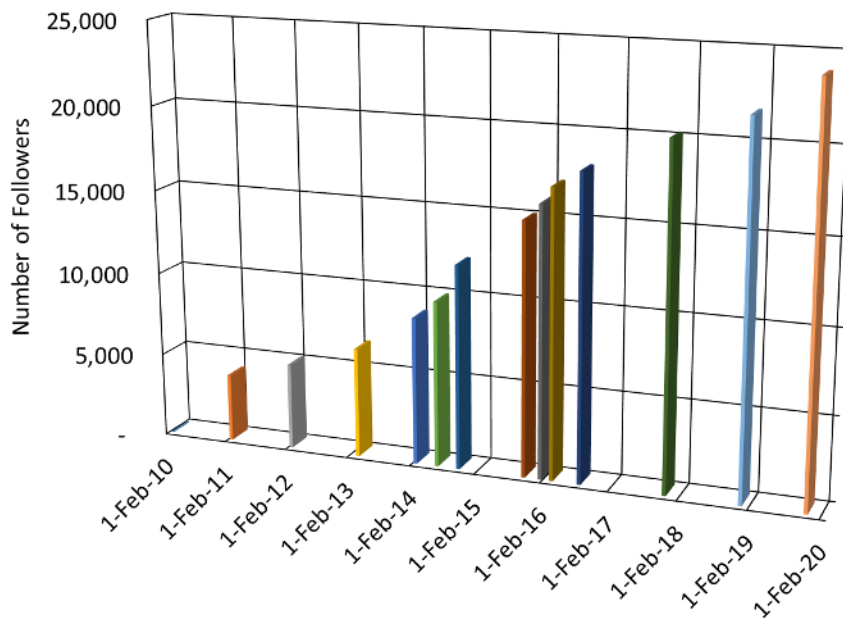
Instagram: <https://www.instagram.com/PrattvilleALgov/>

- 2,535 Followers
- 400 Posts



To show the effectiveness of social media in communicating with the public, Figure 2.2 provides a chart depicting the steady growth in the number of people following the City’s Facebook page. This chart shows that residents are seeking information about City events, programs, and schedules through social media platforms. Social media as an information conduit has gained traction since its inception as residents seek up-to-date alerts, timely information, and deeper understanding of City services.

**Figure 2.2 Facebook Followers**



#### 2.3.4. Public Service Announcements

Several public service announcements (PSAs) were developed to help educate citizens on reoccurring problems with pollution that impacts the City’s MS4. The City has created a YouTube channel to allow continual access to these PSAs at <https://www.youtube.com/user/PrattvilleALgov>. A summary of the PSAs available to the public includes the following:

- Litter PSAs – Four (4) videos with various volunteer organizations, Public Works Department employees, Mayor Gillespie, and other residents removing litter from public areas. The videos encourage residents not to litter and “Do Your Part” to remove existing litter. Residents are encouraged to use the “hashtag” phrase #WHYLitter. The YouTube feeds are available at:
  - [https://www.youtube.com/watch?v=sYA-jMG\\_1c](https://www.youtube.com/watch?v=sYA-jMG_1c)



- <https://www.youtube.com/watch?v=ct5bOi3tRCY>
- <https://www.youtube.com/watch?v=sj3el4U7-lc>
- <https://www.youtube.com/watch?v=YZWOgbY4LD8>
- Garbage Can Tips – The City replaced residents’ garbage cans and provided a Youtube video showing proper can placement, how to dispose of garbage in the can, and where instructions are located on the can. Giving every resident a new garbage can may encourage residents to utilize the cans more frequently, decreasing litter. The YouTube feed is available at: <https://www.youtube.com/watch?v=bOaN-dN3wTg>.

The City has also embedded one litter PSA and the Garbage Can Tips PSA on Public Works Department webpages.

### **2.3.5. Brochures**

The City of Prattville has developed several brochures, booklets, and handouts to provide general information about storm water related issues. Brochures are made available through the City’s website at the “Stormwater Resources” webpage. Some brochures are developed to address either a specific storm water related issue or to a particular audience. These brochures are typically provided to the audience of interest.

During the development of the City’s SWMP, the City determined that using the website is the most cost-effective mechanism to communicate with residents. This provides the City with more flexibility and creativity to reach a wide public audience. There are many advantages to this strategy, including the following:

- Environmental impact of reduced printing;
- Reduced cost of printing;
- Distribution to a wide-reaching audience independent of visiting a physical location;
- Ability to reach an audience at all times through the website; and,
- Increased communication with City employees, residents, community groups, and neighborhood leaders.

Copies of the existing brochures and booklets available on the website are provided in Appendix B. Table 2.1 provides a summary of the brochures that have been developed.



**Table 2.1 Brochures**

Description	Target Pollution Source	Target Audience	Distribution
<b>Brochures</b>			
Storm Drain Stewardship	General Information	Homeowners Renters Schools Business Owners Contractors Professionals Developers	Website
<b>Fact Sheets</b>			
Protecting Water Quality from Urban Runoff	General Information	Homeowners Renters Schools Business Owners Contractors Professionals Developers	Website
<b>Booklets</b>			
Down Stream – A Guide for Preventing Urban Runoff and Stormwater Pollution	General Information	Homeowners Renters Schools Business Owners	Website
Do Your Part – Be Septic Smart	Septic System Management	Homeowners Renters Business Owners	Website
Stormwater Requirements for Construction	Construction Site Permitting Informational Links	Contractors Professionals Developers	Website
Catch a Ride on the Water Cycle	General information Coloring Book	Children	400 distributed at CityFest
<b>Posters</b>			
Stormwater and the Construction Industry	Construction Site Runoff ESC Plans BMP Maintenance	Contractors Professionals Developers	Website

The City coordinated with the following groups to utilize existing materials and develop educational materials that are unique to the City.

- Environmental Protection Agency (EPA);
- Erie County, New York;
- City of Bryan, Texas; and,
- Mid-America Regional Council (MARC).





The City distributed 400 gift bags with copies of the “Catch a Ride on the Water Cycle” coloring book at CityFest in downtown Prattville on 10 and 11 May 2019.

### **2.3.6. Training**

On 26 June 2019, the City’s Storm Water Coordinator gave a presentation to 81 City employees from the Public Works Department about the City’s MS4 program. The presentation included examples of issues the City has encountered and abated including illicit discharges and connections, construction site runoff, food service issues, and litter problems. A copy of the presentation and Employee training sign-in sheet is provided in Appendix F.

## **2.4. Public Involvement**

The City has utilized a variety of techniques to implement its public involvement, and outreach program. Mechanisms and activities that have been implemented this permit year are summarized in the following sections.

### **2.4.1. Public Reporting**

The City has implemented a citizen reporting tool for the general public to provide suggestions and/or to report incidents that may potentially impact the MS4. A citizen can report an issue of concern, nuisance, or request maintenance by visiting: <http://www.prattvilleal.gov/helpdesk/citizen-helpdesk.html>. This reports citizen complaints through the City’s online portal and distributes requests to associated Departments automatically.

The City uses a work order system as the backbone of the City’s reporting portal. The work order system provides the City with an effective tool to work with citizens and resolve their issues.

- Requests from citizens do not get lost or misfiled. All calls entered are stored, routed to the correct department(s), and managed through the work order system. At any time, information and status of a citizen’s request is available.
- The Citizen Helpdesk has been incorporated into the City’s website. This provides a virtual citizen service center available 24 hours a day, seven days a week.



To help track storm water related issues, the City has added a “storm water” tab to the work order system. This may help the City determine frequency and location of recurring stormwater-related issues.

### 2.4.2. Autauga Creek Improvement Committee (ACIC)

In July 2011, the Mayor formed the Autauga Creek Improvement Committee (ACIC) to help protect one of the City’s most iconic natural resources, Autauga Creek. A core group of citizens jumped on board and quickly began the process of removing debris and trash from Autauga Creek. As the ACIC continued to evolve, it obtained status as a nonprofit 501(c)(3) organization and developed the following mission statement:

*“To provide a natural, scenic, and educational recreation experience through ecological conservation and preservation of quality public access to Autauga Creek Canoe Trail”*

In the past couple of years, ACIC has not only secured a spot for Autauga Creek on the Alabama Scenic River Trail, but also acquired the designation as a National Recreational Trail. Signs have been posted along the 14-mile blueway trail to help provide visitors with information about the trail. The sign installed at Doster Well Park and a map of the four (4) mile section of the blueway trail are provided in Figure 2.3. ACIC provides educational opportunities and materials as well as supports cleanup activities along the blueway trail. Information about ACIC is provided at [www.ataugacreek.org](http://www.ataugacreek.org). Selected brochures developed and distributed by ACIC are provided in Appendix B.

**Figure 2.3 Autauga Creek Blueway Trail**



### 2.4.3. Autauga County Water Festival

Autauga County Water Festival is open to all fourth-grade students in Autauga County, including all public schools, private schools, and home school students. The festival is designed to be a fun, educational, and memorable event in a field day atmosphere. The purpose of this event is to educate children about all aspects of water and other related natural resources through interactive hands-on activities. The goal of the festival is to instill in each student a general environmental awareness and stewardship ethic. The City is not only a sponsor of the festival, but also provides volunteers that help organize and host the festival. This year's festival was held on 30 April 2019 and had 213 students in attendance. Photos from the event are included in Figure 2.4.

**Figure 2.4 Autauga County Water Festival**



### 2.4.4. Recycling

During the permit year, the City revamped its recycling program due to the changes in Alabama Department of Correction's recycling program support. The City now offers single-stream recycling as a part of the existing garbage collection process. On 20 August 2019, The City authorized the mayor to enter into an agreement with RePower South for delivery of the City's waste stream to the Montgomery Recycling and Recovery Facility. The facility removes recyclable material and salvageable items before disposing any waste to the landfill. This allows the residents of Prattville to recycle by simply including recyclables in their standard garbage. This program became effective on 26 August 2019.

The City does operate one (1) truck with three (3) crew members dedicated to collecting cardboard and paper products separated by the residents at the curb. For this permit year, the City has collected and recycled approximately 303 tons of cardboard.



The City operates a Recycling Center located at 122 Ridgewood Road. The Center is open on Mondays and Wednesdays from 8:00 AM to 3:00 PM and Saturdays from 7:30 AM to 3:30 PM. On Saturdays, the City also collects garbage and yard debris. The City accepts the following items for recycling:

- Aluminum cans;
- Paper;
- Newspaper;
- Magazines;
- Cardboard;
- Steel and tin cans;
- Appliances;
- Plastics (codes 1 and 2); and,
- Phone books.

The City maintains a drop off location for recyclables in the parking lot of Overlook Park located at 299 Jay Street. The drop off location has bins for paper and cardboard. Pictures of the Recycling Center and new drop off location are provided in Figure 2.5.

The City also operates 17 additional cardboard drop off locations on City properties. These dumpsters are emptied twice weekly.

**Figure 2.5 Recycling Locations**



Prattville Recycling Center



Overlook Park

### 2.4.1. Pet Waste Stations

The City has seven (7) pet waste disposal stations at various locations in Prattville parks and public areas. These stations are regularly maintained including emptying, refilling bags, and general maintenance. The City typically purchases

3,000 bags each permit year. A photograph of the pet waste disposal system installed at Pratt Park is provided in Figure 2.6.

**Figure 2.6 Pet Waste Disposal Station**



#### **2.4.2. Autauga PALS Cleanups**

The City and the Autauga County Commission occasionally have citizens performing mandated community service within the City. This service includes litter cleanups associated with People Against a Littered State (PALS). During the permit year, 17 miles of roadway within the City were cleaned by citizens performing community service. Roadways included:

- Various Park Roads;
- McQueen Smith Road;
- Fairview Avenue;
- County Road 4;
- Highway 82 Bypass; and,
- Highway 31 South.

PALS also sponsored a City park cleanup over multiple days. A cleanup at Pratt Park on 21 September 2019 included 82 volunteers and a cleanup at Old Kingston Park on 28 September 2019 included six (6) volunteers. Copies of the community service roadside cleanup summary and the 2019 Parks Cleanup Day Report are provided by Autauga PALS is included in Appendix B.





## **2.5. Illicit Discharge Detection and Elimination (IDDE)**

The City is continuously implementing an Illicit Discharge Detection and Elimination (IDDE) Program in accordance with the SWMP Plan. The City has been divided into five (5) areas to map and screen outfalls during within a five (5) year period. Boundaries of each area are shown in Figure 2.7.

### **2.5.1. Legal Authority**

On 5 June 2018, the City of Prattville adopted an Illicit Detection and Elimination (IDDE) Ordinance (Ordinance No. 2018-007). The IDDE ordinance establishes the legal authority for the City to prohibit, monitor, and eliminate illicit discharges and/or illicit connections to the City's MS4. The ordinance has not been revised or updated during this permit year.

### **2.5.2. Public Education**

Public education activities associated with the IDDE program are described in Sections 2.3 and 2.4 of this report.

### **2.5.1. Public Reporting**

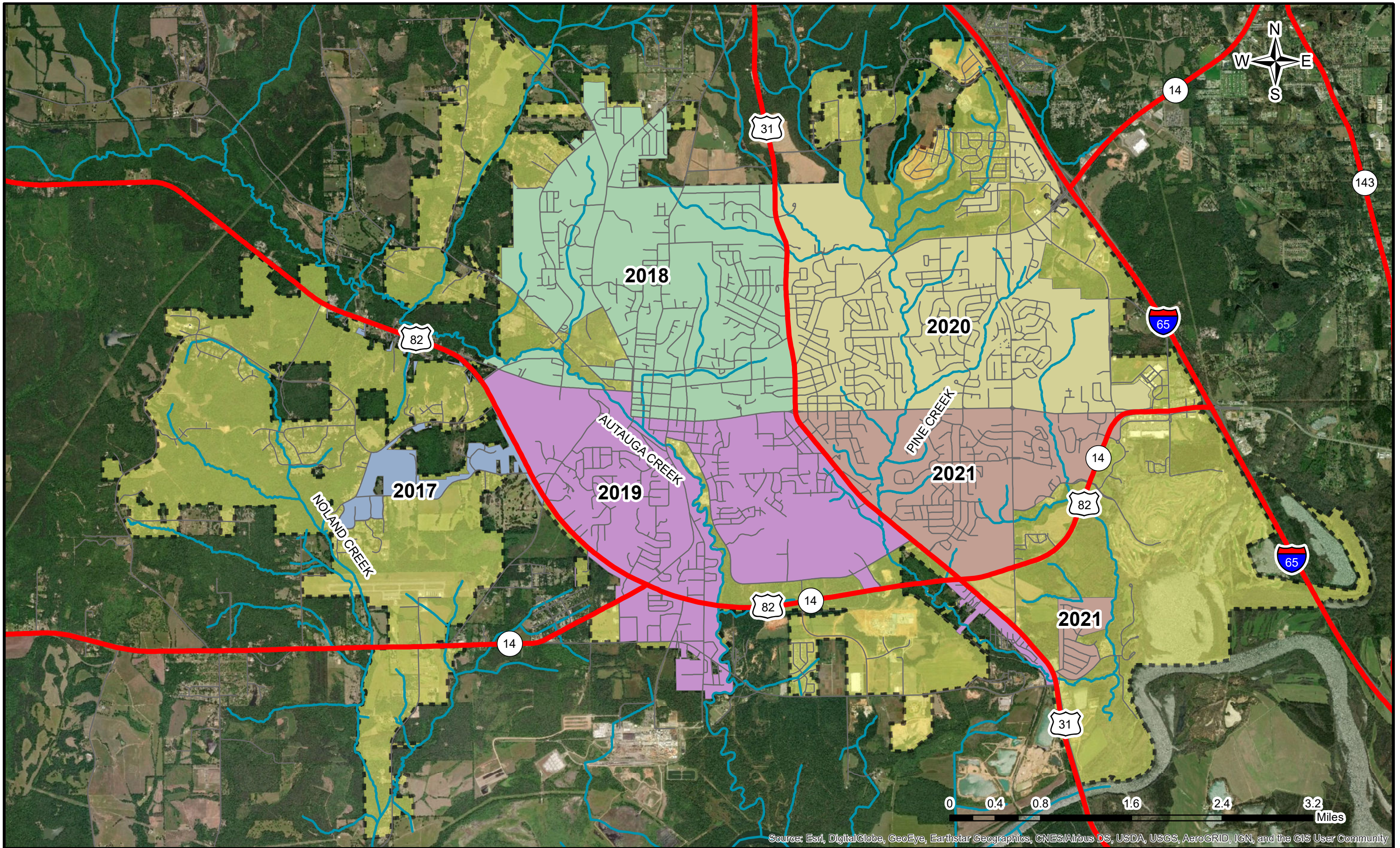
The City has implemented a citizen reporting tool for the general public to provide suggestions and/or to report incidents that may potentially impact the MS4. A citizen can report an issue of concern, nuisance, or request maintenance by visiting: <http://prattvilleal.gov/helpdesk/citizen-helpdesk.html>. This reports citizen complaints through the City's online portal and distributes requests to associated Departments automatically.

### **2.5.1. Outfall Inventory**

The City continued efforts to locate, map, and screen storm water outfalls during the permit year. During this permit year, 100 outfalls have been located and evaluated for the presence of non-stormwater discharges. The City completed the area in Figure 2.7 designated for permit year 2019. There were no illicit discharges identified during the inspections.

The City's IDDE Program describes the approach and use of best available technology for completing an Outfall Reconnaissance Inventory (ORI) to map and screen stormwater outfalls. A mobile application, through ArcGIS Collector, was used to convert the ORI form into an electronic format.





Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community



Prattville City Limits	Streets	2017	2019	2021
ALDOT Roads	Streams	2018	2020	



**CITY OF PRATTVILLE**  
Outfall Mapping and Screening Schedule

Figure 2-7  
September 2019

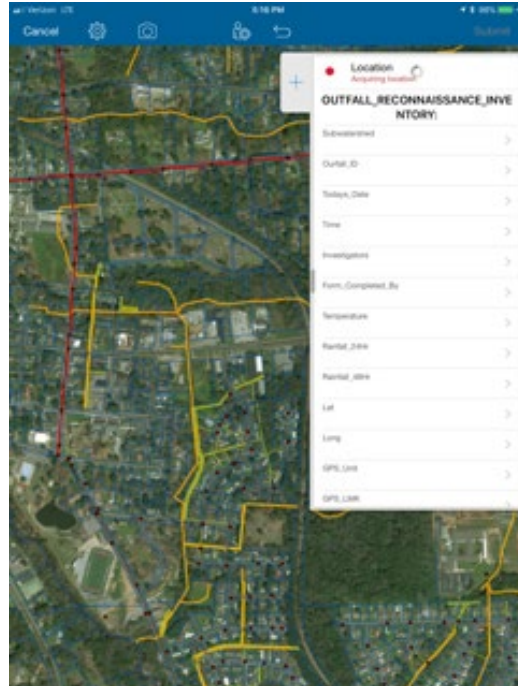


This mobile application provides field crews with the following enhanced capabilities:

- GPS mapping to facilitate outfall location;
- Electronic data collection;
- Minimize the types of equipment needed for field work;
- Ability to report a problem immediately when it is discovered; and,
- Data collected is in ArcGIS format.

Data collected during the ORI is maintained in the City’s GIS dataset for stormwater outfalls. Screen shots of the ArcGIS Collector mobile application are provided in Figure 2.8. A summary of the outfalls screened from 1 October 2018 through 30 September 2019 is provided in Table 2.2 and shown in Figure 2.9. Copies of the outfall mapping forms are provided in Appendix B.

**Figure 2.8 ArcGIS Collector Application Screenshot**



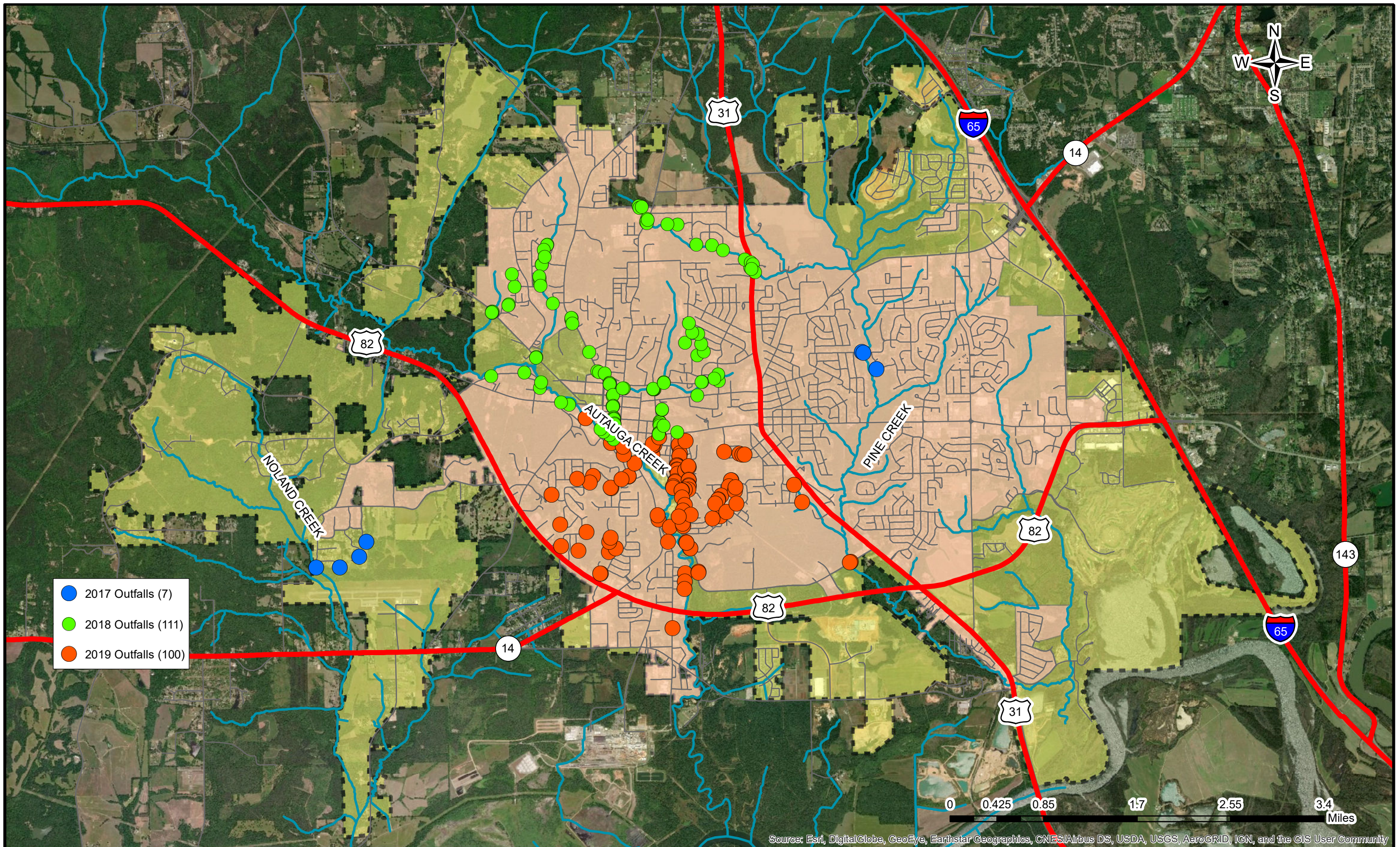
**Table 2.2 2019 Outfalls Screened by Watershed**

Watershed	Total	2017	2018	2019	2020	2021
Noland Creek	4	4				
Autauga Creek	192		92	100		
Pine Creek	22	3	19			
Totals	218	7	111	100		

### 2.5.1. Priority Areas

Based on the major outfall screening activities, the City has not identified any areas that should be designated as priority areas that would require more frequent screening.









### **2.5.2. Training**

On 26 June 2019, the City's Storm Water Coordinator gave a presentation to 81 City employees from the Public Works Department about the City's MS4 program. The presentation included examples of issues the City has encountered and abated including illicit discharges and connections, construction site runoff, food service issues, and litter problems. A copy of the presentation and Employee training sign-in sheet is provided in Appendix F. Investigations conducted by the City are described in the "Illicit Discharge Investigations" section of this report.

### **2.5.3. Illicit Discharge Investigations**

The City investigated seven (7) instances of suspect illicit discharges based on complaints received through the City's Complaint Tracking System, Facebook posts, or calls received by various City Departments. A summary of each complaint and investigation is listed below.

- 2399 Cobbs Ford Road – A City employee reported a large amount of garbage in a detention pond. The owner was given a verbal warning and told to clean up the pond.
- 138 North Washington Street – A resident reported remnants of a previous sanitary sewer overflow in a storm drain inlet. The remnants were cleaned, and full circle wrap was installed on the sanitary sewer pipe connection to prevent future leakage.
- 269 Murfee Drive – A resident called and reported flooding at their residence originating from this location. Upon inspection, the City found that a PVC pipe was connected to the homeowner's washing machine and discharging into the resident's yard. The City issued a Warning Notice the same day of the inspection.
- 730A Hillcrest Drive – A resident called and reported sewage odor at this location. Upon inspection, the City found that a residential sanitary sewer lateral was broken and discharging underneath the house. The City issued a Warning Notice the same day of the inspection.
- 978 Upper Kingston Road – A City employee reported a break in a sanitary sewer lateral probably caused by utility work. The lateral was repaired and replaced within one hour.
- 458 Ceresa Drive – A resident reported a sewage leak at a private residence to the Mayor's office. The City performed an inspection,



confirmed a private sanitary sewer leak, and shut the resident's water off until the issue was resolved.

- 1780 East Main Street – The City received a complaint from a citizen regarding a restaurant dumping grease at the site. Upon inspection, the City discovered that the restaurant was dumping grease into a nearby storm sewer inlet and dumpster. Also, the restaurant's grease trap was full of the dumpster drainage. The restaurant was issued a Notice of Violation (NOV) on 23 May 2019 requiring the restaurant to cease grease dumping, clean the site, and pump out the grease trap.

All of the non-storm water discharges were abated and subsequently confirmed by City personnel. A copy of the City investigation records is provided in Appendix D. A comparison of complaints received during the past three (3) permit years is shown in Table 2.3 and Table 2.4. These tables show that the City's efforts to inform residents about public reporting methods is effective. Residents may use various methods to alert the City of potential non-stormwater discharges.

### **2.5.1. Grease Control Program**

In order to minimize the disposal of used grease into the sanitary sewer system, the City has implemented a fats, oils, and grease control program. This program requires a food service establishment to install, operate, and maintain a grease interceptor or trap. A food service establishment is required to submit an annual report summarizing any maintenance activities performed on the grease interceptor or trap. Periodic inspections of the food service establishment are performed by the City.

### **2.5.2. Sanitary Sewer System**

A majority of the City's MS4 area is serviced by the City's sanitary sewer system. The City owns and operates the sanitary sewer collection system and two (2) Wastewater Treatment Plants. If any problems with the sanitary sewer system are encountered, they are reported to the Public Works Wastewater Department.



**Table 2.3 Complaint Types by Permit Year**

Complaint Type	2017	2018	2019	Total
Sanitary Sewer	1	4	5	10
Illegal Dumping/Trash	2	1	1	4
Oil/Household Hazardous Waste	1	2		3
Construction Site Runoff	2			2
Restaurant/Grease		1	1	2
Wash Water		1		1
Ditch Erosion		1		1
Other/No Discharge		1		1
Totals	6	11	7	24

**Table 2.4 Reporting Mechanism by Permit Year**

Reporting Mechanism	2017	2018	2019	Total
Phone Call	1	3	5	9
Contact Mayor	2	1	1	4
City Employee	3	4	1	8
Social Media		1		1
ORI		1		1
ADEM		1		1
Totals	6	11	7	24

## 2.6. Construction Site Runoff

Major accomplishments in the Construction Site Runoff Program are summarized below.

### 2.6.1. Legal Authority

On 5 June 2018, the City of Prattville adopted an Erosion and Sediment Control (ESC) Ordinance (Ordinance No. 2018-007). The ordinance has not been revised or updated during this permit year.



### **2.6.2. Permitting and Plan Review**

The City has a process for reviewing, approving, and permitting new development and redevelopment projects consisting of land-disturbing activities. Before the commencement of any land disturbing activity that is not exempted from obtaining a permit, the owner and/or operator of the construction site is required to submit a grading permit application for approval of the Construction Best Management Practices (CBMP) Plan. The grading permit application requires the following information:

- Applicant Information;
- Site Information;
- Project Description;
- Type of Construction;
- If the proposed construction activity is required to obtain a General NPDES Permit for construction activity from ADEM, a copy of the Notice of Intent (NOI) submitted to ADEM and a copy of ADEM's authorization under the General NPDES Permit;
- CBMP Plan;
- Surety Bond or Letter of Credit; and,
- Application Fee.

There were no revisions or updates to the grading permit during the permit year. Copies of the grading permit package and technical memorandum are provided in the SWMP Plan.

### **2.6.1. Training and Certification**

Currently, the City has five (5) Qualified Credentialed Inspectors (QCIs). A copy of the QCI certificates is provided in Appendix D.

### **2.6.2. Education and Training Materials**

The City has provided links on its website for education, training materials, and resources for construction site operators, as discussed in Section 2.3 of this report.

### **2.6.3. Inspections**

The City has a form for construction site BMP inspections and a general erosion and sediment control plan for residential construction. There were not revisions or updates to either from during this permit year. Copies of the Construction Site

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Inspection Form and General Residential BMP standard details are contained in Appendix E of the SWMP Plan. Copies of the inspection examples performed in the permit year are provided in Appendix D.

The Building Department tracks General BMP inspections through Citizen Serve software by permit number. Prior to performing requested building inspections, the Building Inspectors check ESC BMPs for proper installation, damage, performance, etc. An example copy of a Citizen Serve inspection is provided in Appendix D.

#### **2.6.4. Enforcement**

Occasionally, the City shall request that ADEM enforce compliance with NPDES permittees in non-compliance. During the permit year, the City filed one (1) complaint concerning a construction site to ADEM for violations of their NPDES permit. These sites received a consent order from ADEM. Other enforcement actions taken by the City during this permit year include the following:

- Forty (40) failed General BMP Inspections requiring Re-inspection;
- Thirty-three (33) Verbal Warnings;
- Ten (10) Written Warnings;
- Seven (7) Notices of Violation (NOVs) Letters;
- One (1) Stop Work Order; and,
- One (1) Request to ADEM for assistance.

A copy of the enforcement actions is provided in Appendix D.

#### **2.6.5. Public Reporting**

The City has implemented a citizen reporting tool for the general public to provide suggestions and/or to report incidents that may potentially impact the MS4. A citizen can report an issue of concern, nuisance, or request maintenance by visiting: <http://www.prattvilleal.gov/helpdesk/citizen-helpdesk.html>. This reports citizen complaints through the City's online portal and distributes requests to associated Departments automatically.

### **2.7. Post Construction Storm Water Management**

The City has developed a city-wide concept that provides a systematic basis for thinking about the City's future. The future development pattern of the City has



been organized with appropriate recognition given to the City's green infrastructure, its street and utility infrastructure, and major existing uses of land.

### **2.7.1. Legal Authority**

On 5 June 2018, the City of Prattville adopted a Post Construction Storm Water Management Ordinance (Ordinance No. 2018-008). The ordinance has not been revised or updated during this permit year.

### **2.7.2. Post Construction Technical Memorandum**

The City's Post Construction Storm Water Ordinance establishes design standards through a Design Memorandum. During the permit year, the City developed a technical memorandum describing how it will implement a post-construction storm water management program for qualifying new development or redevelopment. Since the most common BMPs used to address post-construction storm water management are detention and retention ponds, the technical memorandum was developed to address detention and retention ponds first. Additional BMPs may be included in the future. Components of the technical memorandum include the following:

- Overview;
- Applicable Developments;
- Implementation;
- Waiver Request;
- Water Quality Requirements;
- Low Impact Development;
- Design Standards;
- Detention and Retention Ponds;
- As-Built Certification;
- Annual Inspections;
- Home Owner's Association (HOA) Requirements; and,
- Operation and Maintenance.

The technical memorandum was finalized and is effective on 5 October 2018. A copy of the Technical Memorandum is provided in Appendix E.

### **2.7.3. Waiver Request**

The City recognizes that there are existing project sites that have been constructed or previously approved, prior to the effective date of the technical memorandum, that may qualify for a waiver from the updated post-construction storm water management requirements. Also, there may be projects which reduce the existing impervious area within the development. As a result, the City has developed two (2) Post-Construction Storm Water Management Waiver Request Forms to address existing project sites and sites with impervious area reductions.



In order for a project site to be considered for a waiver, the waiver request form must be completed and submitted to the City for review and approval. If a waiver has been submitted for a development that has not been completed and the density of the development is increased and/or modified, the developer is required to resubmit a waiver request for this development.

Copies of the Waiver Request Forms are provided in Appendix E. The City reviewed and approved three (3) Waiver Requests during the permit year.

#### **2.7.4. Water Quality Requirements**

Post-construction storm water runoff quality is an important component of the City's SWMP. For all qualifying new development or redevelopment, Post-construction storm water management shall include water quality BMPs to detain and treat the first 1.14 inches of rainfall that occurs on the project site.

#### **2.7.5. Low Impact Development**

The City shall encourage landowners and developers to incorporate the use of low impact development (LID) into development plans. The City has reviewed and adopted the latest version of the *Low Impact Development (LID) Handbook for the State of Alabama*.

#### **2.7.6. Post Construction BMP Plan Review**

The City already has a permitting and plan review process that is shown in the SWMP Plan. During the development of the Post-Construction Storm Water Management Program, the City has incorporated the post construction BMP plan review into the existing process.

During the permit year, five (5) development projects using the Design Form in the Technical Memo were received by the City, reviewed, and approved for construction. Copies of the Design Forms are provided in Appendix E.

#### **2.7.1. As-built Certification**

As a part of the NPDES permit, the City must insure the BMPs that have been designed and approved are constructed and operated in accordance with their original design and intent. In an effort to confirm that the constructed BMPs meet the designer's intent, an As-Built Evaluation and Certification form has been developed. It is the Owner's responsibility to have as-built information, such as pond volume, embankment size and elevations, invert size and elevations, and spillway elevations, field surveyed by a Professional Land Surveyor. It is the





Engineer-of-Record's responsibility to utilize the field surveyed information to fill out the As-Built Evaluation and Certification Form.

A copy of the As-Built Evaluation and Certification Form is provided in Appendix E. The City did not receive any As-Built Evaluation and Certification Forms during the permit year.

### **2.7.1. Operation and Maintenance Agreement**

It is the responsibility of the Owner to operate and maintain the storm water management facility and/or BMPs in accordance with the original design intent and approval. If the original Owner or Developer has sold the project or passed ownership on to a Homeowner's Association, then it is the new Owner or HOA's responsibility to maintain the facility and provide any required inspection and maintenance. Prior to Final Plat Approval, the owner must submit an Operations and Maintenance Agreement (OMA) to the City for approval.

Should maintenance be needed at a facility as a result of the Annual Inspection, the Owner is required to provide the City with documentation describing the maintenance required and a schedule for completing all maintenance activities. Once all maintenance activities are completed, the Owner is required to provide documentation to the City of the maintenance performed and that the BMP operates as it was designed. Under the City's OMA, if the owner or developer does not complete the construction of BMPs fully or does not maintain BMPs according to the required standards, the City can perform any necessary measures to bring the BMPs into compliance. The owner is responsible for reimbursing the City for any reasonable costs associated with the completion or maintenance of the BMPs.

A copy of the OMA is provided in Appendix E. The City did not receive any OMAs during the permit year.

### **2.7.2. Annual Inspection**

In order for post-construction BMPs to continue to function in accordance with their original design and installation, annual inspections are required by the City's NPDES permit. The Owner of the project is required to have these annual inspections performed and must then submit the required Annual Inspection Form to the City. The Annual Inspection Form shall provide documentation concerning the condition of each facility in terms of vegetative cover, erosion that may be occurring, the condition of inlets into the pond and the pond outlet, embankment conditions, and any maintenance required and/or performed. The City shall





evaluate the documentation submitted to confirm that the storm water management facilities are continuing to function as designed.

A copy of the Annual Inspection Form is provided in Appendix E. The City did not receive any Annual Inspection Forms during the permit year.

### **2.7.3. Maintenance Escrow Agreement**

For residential subdivisions with Home Owner's Associations (HOAs), the City's Post-Construction Management Ordinance requires the establishment of an escrow account to ensure that adequate funds are available to provide for the operation, long-term maintenance, inspection, repair, and replacement or reconstruction of Post-Construction BMPs. An escrow account should be established to, at minimum, cover 50% of the constructed cost of each BMP the HOA is responsible for. The City requires HOAs to sign a Maintenance Escrow Account Agreement form and report the annual financial status of the escrow account with the Escrow Account / Maintenance Request Form the City provides in the Technical Memorandum.

Copies of the Escrow Account Agreement and Escrow Account / Maintenance Request Form are provided in Appendix E. The City did not receive any Escrow Account Agreement and Escrow Account / Maintenance Request Forms during the permit year.

## **2.8. Pollution Prevention and Good Housekeeping**

The pollution prevention / good housekeeping program is a key element to help the City to reduce potential pollutants from entering storm water runoff. This control measure requires the City to evaluate existing facilities and operations to identify areas of improvement that will help ensure a reduction in the amount and type of potential pollutants. The City's activities are summarized in the following sections.

### **2.8.1. Municipal Facilities**

The City provides a wide range of services to its citizens by various City Departments and facilities located throughout the City. The City maintains approximately 117 properties that consist of support facilities, parks, ball fields, and building grounds that occupy approximately 1,314 acres (2.0531 square miles).



### 2.8.1.1. Facility Inventory

The majority of municipal properties consist of parks and athletic fields which are actively utilized by the public throughout the year. Maintenance and upkeep of these facilities are performed on a routine basis. Routine inspections of parks and athletic fields will not be performed. The City has identified six (6) facilities where operational activities occur to support City services as summarized in Table 2.5 and are shown in Figure 2.10.

**Table 2.5 Municipal Support Facilities**

Facility Name	Department	Division	NPDES Permit
Public Works Yard	Public Works	Public Works	NA
Recycling Center		Sanitation	NA
Pine Creek WWTP		Wastewater	AL0027723
Autauga Creek WWTP		Wastewater	AL0026654
Parks and Recreation Yard	Parks and Recreation	Parks and Recreation	NA
Street Division Yard	Engineering	Engineering	NA

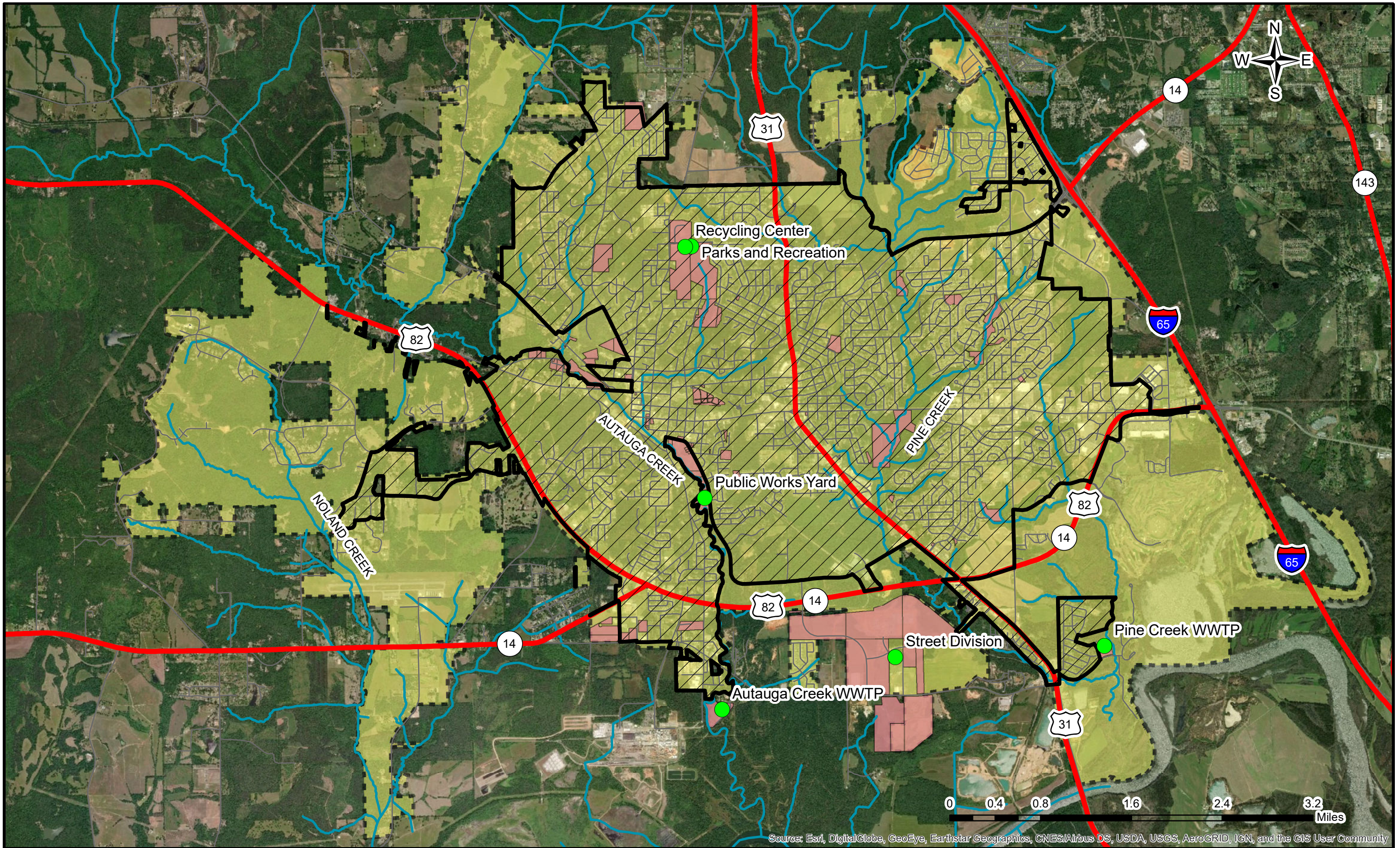
### 2.8.1.2. Municipal Facility Inspections

The City has developed a Municipal Facility inspection form to document annual inspections of Municipal Facilities identified in Table 2.5. This form includes the following information.

- Facility Type;
- Inspection Type;
- Parking Areas;
- Vehicle Maintenance Areas;
- Trash Storage Areas;
- Material Storage Areas;
- Equipment Storage Areas;
- Fueling Station;
- Washing Station; and,
- Follow-up Actions and/or Maintenance Required.

During the permit year, the City performed inspections of the six (6) facilities identified in Table 2.5. Copies of the inspection forms are provided in Appendix F.





Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community



Prattville City Limits	City Property	ALDOT Roads	Streams
Prattville MS4 Area	Municipal Facility	Streets	



**CITY OF PRATTVILLE**  
Municipal Facility Inventory

Figure 2-10  
September 2019





### **2.8.1.3. Standard Operating Procedures**

The City has developed Standard Operating Procedures (SOPs) for the various activities required for implementing the Pollution Prevention and Good Housekeeping Program. SOPs the City currently maintains include to the following:

- Pesticides, Herbicides, and Fertilizers usage;
- Rain day schedules and activities for Urban Management crews; and,
- Emergency procedures for Spills and Leaks at Fire Stations 1 and 3 and Street Division Yard.

The City may develop additional SOPs and update existing SOPs for City maintenance activities, on an as needed basis. Existing SOPs are provided in Appendix G of the SWMP Plan.

### **2.8.1.4. Facility Maintenance**

Maintenance activities are performed by either the Parks and Recreation Department or the Urban Management Department. A summary of the responsibilities for each department is provided below:

The Parks and Recreation Department is responsible for maintenance of the playing fields and recreational facilities. The Parks and Recreation Department has three (3) crews with each crew assigned specific facilities. Activities performed at each facility is tracked on a on a Parks Checklist. An example of the Parks Checklist is provided in Appendix F.

The Urban Management Department is responsible for the perimeter areas of parks, grounds maintenance, mowing, litter patrol, and ditch maintenance. Resources allocated for each activity includes:

- Parks – Three (3) crews with each crew assigned to specific facilities
- Grounds Maintenance – Two (2) crews
- Mowing – Two (2) crews
- Ditch Maintenance – Two (2) crews; for ditch maintenance, the City has been divided into nine (9) separate sections. Within each section, ditches maintained by the City have been identified with a unique alpha-numeric code. Maps for each section are provided in Appendix G of the SWMP Plan.



The Urban Management Department records a Daily Checklist for each of the crews. Examples of the checklists are provided in Appendix F.

#### **2.8.1.5. Training**

On 26 June 2019, the City's Storm Water Coordinator gave a presentation to 81 City employees from the Public Works Department about the City's MS4 program. The presentation included examples of issues the City has encountered and abated including illicit discharges and connections, construction site runoff, food service issues, and litter problems. A copy of the presentation and Employee training sign-in sheet is provided in Appendix F.

#### **2.8.2. Roads**

The City is continuously implementing an effective road maintenance program to prevent potential pollutants from entering the storm sewer system. Components of the program include the following:

- Street Sweeping;
- Litter Control;
- Leaf Collection; and,
- Mitigation of hazardous road conditions associated with icing.

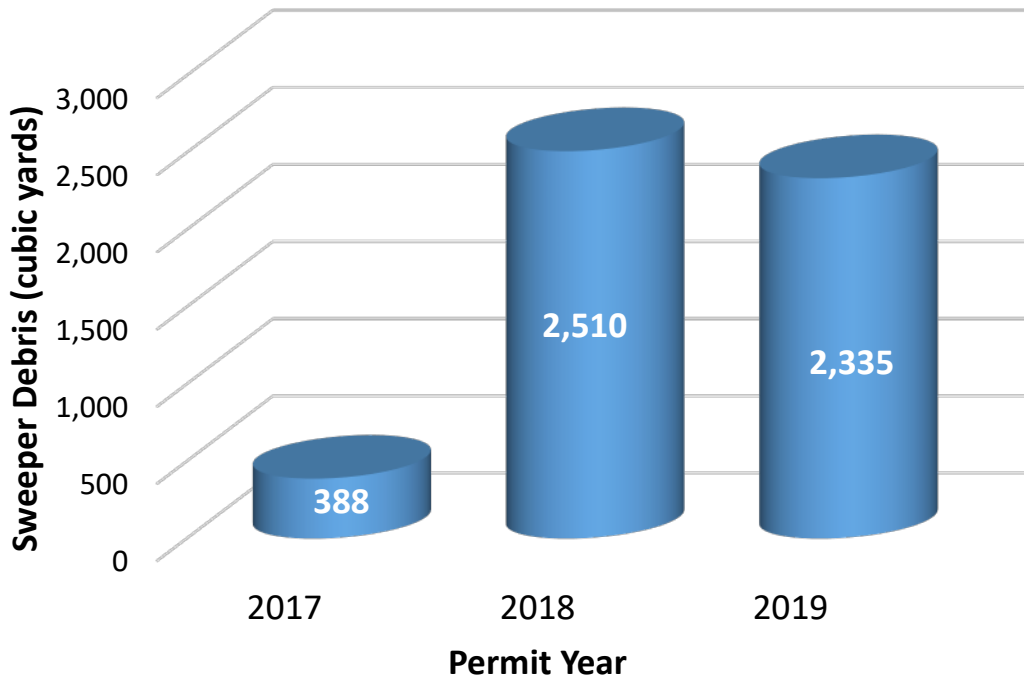
##### **2.8.2.1. Street Sweeping**

The Public Works Department has two (2) street sweepers dedicated for street sweeping. Curbed streets are typically swept once a week. Streets scheduled for resurfacing are swept and cleaned prior to resurfacing. Routine sweeping schedules have been developed to maximize the use of street sweepers. Maps showing the streets swept are included in Appendix G of the SWMP Plan.

The City has developed a Street Sweeping Collection Log to track the amount of debris removed from street sweeping activities. This information is incorporated into the Urban Management Debris Removal Summary, which tracks debris removed from street sweeping, litter control, and ditch maintenance activities. Copies of the Street Sweeping Collection Log and Urban Management Debris Removal Summary are provided in Appendix F. During the permit year, the City swept and removed approximately 2,335 cubic yards of material. A graph showing a comparison of street sweeper material collected is shown in Figure 2.11.



**Figure 2.11 Street Sweeper Debris – Permit Year Comparison**



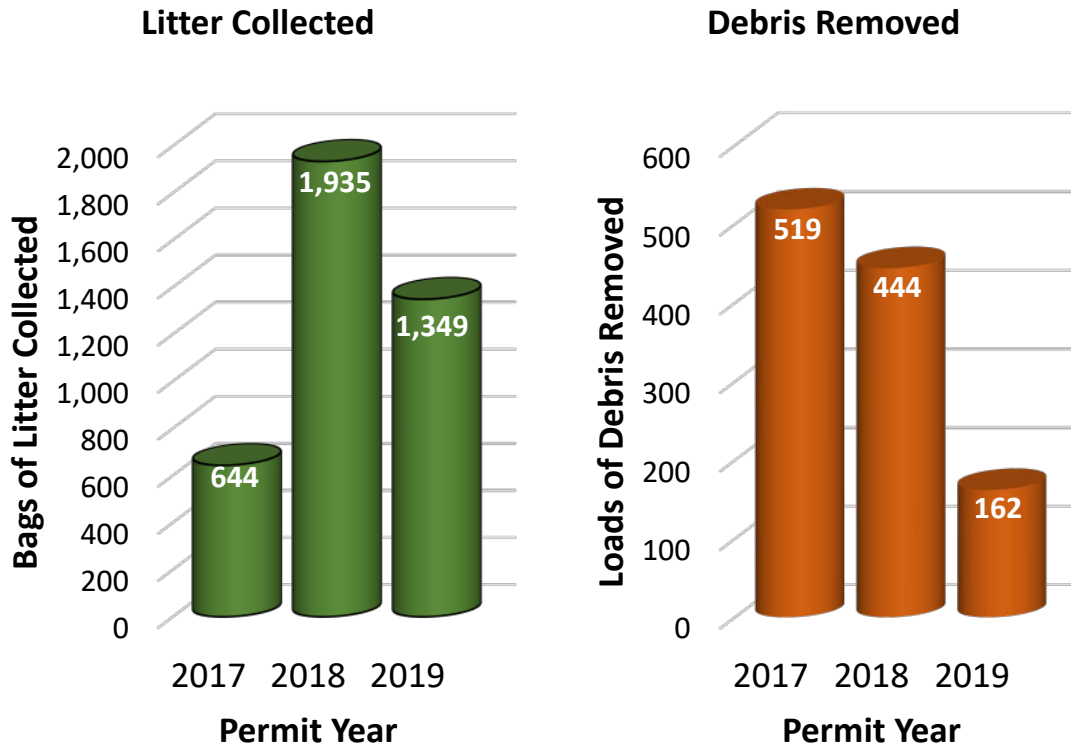
**2.8.2.2. Litter Control**

Roadside litter control BMPs implemented by the City to address health and aesthetic concerns also improve the quality of stormwater runoff by limiting trash in runoff conveyance systems. Public Works Department crews routinely collect and dispose of litter, trash, and debris.

The Urban Management Department records Daily Checklists for each maintenance crew during the permit year. The forms incorporate tracking the amount of litter removed in bags. This information is incorporated into the Urban Management Debris Removal Summary, which tracks debris removed from street sweeping, litter control, and ditch maintenance activities. Copies of the Urban Management Daily Checklists and Urban Management Debris Removal Summary are provided in Appendix F. During the permit year, the City collected and disposed of approximately 1,349 bags of litter and 162 loads of debris. Graphs showing comparison by permit year of litter collected and debris removed is shown in Figure 2.12.



**Figure 2.12 Litter and Debris Removal – Permit Year Comparison**



**2.8.2.3. Deicing Activities**

Based upon the City’s location, winter weather is infrequent. The City spreads sand on roads with snow or ice cover. After winter weather has subsided, the City removes the sand using a small front-end loader and a street sweeper. Salt is not used for any deicing activities. The City did not have any deicing events during the permit year.

**2.8.3. Pesticide, Herbicide, and Fertilizer**

The City is continuously implementing an effective pesticide, herbicide, and fertilizer (PHF) program to prevent potential pollutants from entering the storm sewer system.

**2.8.3.1. PHF General NPDES Permit**

The City is currently applying for coverage under the ADEM General NPDES Permit for discharges associated with the application of pesticides. The City tracks



mosquito (pesticide) spraying activities through the Mosquito Spray Log. A copy of the log is provided in Appendix F.

**2.8.3.2. PHF Standard Operating Procedures**

Application, storage, and disposal of pesticides, herbicides, and fertilizers shall be performed in accordance with Federal and State regulations and in accordance with the manufacturer’s recommendations. The City has developed the following Standard Operating Procedures (SOPs) for mixing, application, clean up, storage, training, and record keeping:

- SOP PHF-01 – Mixing, application, clean-up, and chemical calculations

A copy of the SOP is provided in Appendix G of the SWMP Plan.

**2.8.3.3. Facility Inventory**

The City maintains approximately 117 properties that consist of support facilities, parks, ball fields and building grounds that occupy approximately 1,314 acres (2.0531 square miles). The locations of City Property are shown in Figure 2.10.

**2.8.3.4. PHF Storage Facilities**

The City tries to optimize the use of pesticides, herbicides and fertilizers as well as minimize the quantity of chemicals stored. Chemical storage facilities are summarized in Table 2.6 and shown in Figure 2.10.

**Table 2.6 PHF Storage Facilities**

Facility	Address
Parks and Recreation Yard	161 Ridgewood Road
Public Works Yard	530 Doster Road

The City’s PHF storage facilities were inspected during the annual Municipal Facility Inspection of the Parks and Recreation Yard and Public Works Yard.

**2.8.3.5. Certification and Licensing**

Chemical application is either performed by the Public Works Department or the Parks and Recreation Department. The City has one (1) person that is certified as a commercial applicator. A copy of the current certification is provided in Appendix F.





#### **2.8.3.6. Chemical Inventory**

The City may use a variety of pesticides, herbicide, and fertilizer chemicals on road rights-of-way and City Areas. An inventory of chemicals stored at the Public Works Yard is provided in Appendix F.

#### **2.8.3.7. PHF Application**

The Public Works Department has developed a log to document PHF applications. Included in the form is information such as application location, type and rate of chemical applied, weather conditions, and applicator name. A copy of the application log is provided in Appendix F.

#### **2.8.3.8. PHF Disposal**

Typically, the City purchases chemicals as needed per application. This minimizes and/or eliminates the need for chemical disposal. During this permit year, the City either applied or stored chemicals it purchased.

### **2.9. Monitoring Activities**

There are no 303(d) listed or TMDL waters located within the City's MS4 Area. In accordance with Part III.1 of the City's NPDES MS4 Permit, the City is not required to develop and implement a monitoring program.

If waters within the City's MS4 Area become listed on the 303(d) list, the City shall develop a monitoring program to evaluate the pollutants of concern.

### **2.10. Program Evaluation**

The City has developed realistic, achievable, and measurable goals and performance milestones to measure the progress in implementing its SWMP. The most basic measure to evaluate the program effectiveness is to evaluate whether the program goals are being met. During this permit year, the City has met all of its measurable goals and performance milestones as defined in the SWMP Plan.

#### **2.10.1. Strengths**

The biggest program strength is that the City has moved forward with developing, managing, and implementing a SWMP. City staff are actively involved in the development, management, and daily implementation of BMPs that will protect and help improve storm water quality. This also allows the City's SWMP to be a dynamic program with the ability to evolve as necessary to meet the specific needs



of the City. Advantages of the City's SWMP include but are not limited to the following:

- City leadership actively supports the storm water program;
- City leadership can develop policies and initiatives that are in the best interest of the City, its citizens, and the environment;
- The City has a vested interest in the success of their SWMP;
- The Public Works Department has been tasked with the responsibility to coordinate with other City departments to develop, manage, and implement the SWMP;
- City staff has a better understanding and knowledge base of the facilities, infrastructure, and activities that are occurring within the City. This allows City staff to proactively address potential problems before they arise;
- City staff are involved daily with the implementation of the SWMP; and,
- The City has existing programs that are used to minimize and/or eliminate the potential for discharging pollutants in storm water runoff. Some of these programs have been operating for many years.

### **2.10.2. Weaknesses**

While the City has made significant progress in developing a SWMP, the City faces many challenges as the SWMP continues to evolve. Program weakness include the following:

- Program Implementation – The SWMP is new to the City and requires the City to develop programs for activities that have not previously been performed. As the City develops and implements its SWMP, the City anticipates that the SWMP will change and evolve as staff develop a better understanding of the NPDES permit, rules, and regulations.
- Funding – Since the MS4 NPDES permit is driven by an unfunded mandate, the City does not have a dedicated funding source to develop and implement the SWMP. As the City's develops and implements the SWMP, additional staff and resources may be needed to support the activities described in new program elements.



- Enforcement – New rules, regulations, and ordinances are being developed in support of the SWMP. Informing the community of new rules, regulations, and ordinance changes will be an ongoing process. Although gradual improvement in compliance will occur over time, there still will be compliance and enforcement issues.
- Public Expectations – The public is aware of environmental related issues and proactively involved in community affairs. Sometimes public expectations exceed the resources and capabilities of the City.

### **2.10.3. Effectiveness**

Currently, there are no 303(d) listed or TMDL waters located within the City's MS4 Area. The City has implemented BMPs through the SWMP to maintain this designation and further improve stormwater quality within the City's MS4. Some examples of the effectiveness of the City's SWMP include:

- Public Education – The City has tracked growth in public awareness through public participation in social media platforms. Residents have consistently utilized the City's website and social media to stay informed of the City's SWMP and any new developments as the program has developed.
- Public Involvement – The City has received complaints and reports through various conduits including phone calls to City Departments, Citizenserve requests, calls to the Mayor, City employee reports, and Facebook messages. This shows the effectiveness of the City's public education program. The City has provided several opportunities for the public to participate in stormwater related activities.
- IDDE – The City has implemented an effective outfall mapping and screening program. During the mapping and screening of 218 outfalls the City has identified only one non-storm water discharge. This implies that citizens are aware of storm water-related issues and protecting the City's natural resources.
- Construction Site Runoff – The City has implemented an effective construction site runoff program to help educate and hold the development community accountable for their construction activities. Enforcement actions taken by the City have helped the development community to improve its erosion and sediment control practices to reduce the loss of sediment from construction sites.



- Post Construction Stormwater Management – The City has developed and implemented a post-construction storm water management program that provides water quality benefits and storm water management to minimize the impact of development. The program provides for review of post-construction storm water management practices in the design phase, construction phase and operation phase.
- Pollution Prevention and Good Housekeeping – The City has implemented municipal facility inspections, street sweeping, litter patrols, PHF BMPs, and other BMPs to minimize the potential of pollutants from being discharged in stormwater runoff. Also, City employees have reported eight (8) storm water-related issues to the City, implying that the training received is effectively promoting awareness and knowledge of the reporting process.

The City has developed and is implementing a very effective SWMP to protect the natural resources within the City.



## SECTION 3

Summary Tables



## 3. Summary Tables

The purpose of the table is to document in a concise form the program activities and permittee's compliance status with quantifiable permit requirements. The following tables in this section provide a summary of the City of Prattville's MS4 program activities.

### 3.1. Public Education and Public Involvement

Program Component	SWMP Activity Schedule		
	Required	Complied	Accomplished
Public Education (Minimum of 1 activity / year)	Local Partnerships Track	Yes	1 ACES member assists with ESC inspections
	Web Site Update as needed	Yes	Website has been updated
	Social Media Track	Yes	Facebook 23,922 Followers Twitter 3,404 Followers Youtube Channel 146 Subscribers Instagram 2,537 Followers
	Brochures Track	Yes	Available on Website 1 Brochure 1 Fact Sheet 3 Booklets 1 Poster
	Public Service Announcements Track	Yes	4 Public Service Announcements available online
	Training Track	Yes	1 MS4 presentation 81 City staff
Public Involvement (Minimum of 1 activity / year)	Citizen Reporting Tool Track	Yes	Available on City's website
	Water Festival Track	Yes	1 Event Approx. 213 students



Program Component	SWMP Activity Schedule		
	Required	Complied	Accomplished
Public Involvement (Minimum of 1 activity / year) continued	Pet Waste Disposal Stations Track	Yes	7 Stations maintained 3,000 bags purchased annually
	Recycling Track	Yes	City Cardboard Recycling 303 tons Began single-stream Recycling
	Public Events Track	Yes	CityFest 400 coloring books distributed

**Comments**

1. Supporting information, documentation, and data summarized in the table are provided in Appendix B.
2. Records and information are maintained in the Public Works Department.



### 3.2. Illicit Discharges and Improper Disposal

Program Component	SWMP Activity Schedule		
	Required	Complied	Accomplished
Legal Authority	Illicit Discharge Ordinance Update as needed	Yes	No updates or revisions required
Outfall Inventory	Mapping and Screening Schedule Update as needed	Yes	Schedule was updated in the SWMP Plan
	Outfall Screening Inspection Form Update as needed	Yes	No updates or revisions required
	Outfall Map Annually	Yes	Map has been updated
	Outfall Mapping and Screening Each Outfall 1 / 5 yr	Yes	100 Outfalls
Illicit Discharges	Citizen Reporting Tools Update as needed	Yes	Available on City's website
	Inspection Form Update as needed	Yes	No updates or revisions required
	Source Tracing Procedures Update as needed	Yes	No updates or revisions required
	ADEM Notification Procedures Update as needed	Yes	No updates or revisions required
	Mitigation Procedures Update as needed	Yes	No updates or revisions required
	Training Update as needed	Yes	No updates or revisions required
	Training Track	Yes	1 MS4 presentation 81 City Staff
	Complaints Track	Yes	7 Complaints
Illicit discharge investigations Track	Yes	7 illicit discharge complaint investigations 0 Non-stormwater discharge investigation from outfall screening	





Program Component	SWMP Activity Schedule		
	Required	Complied	Accomplished
Illicit Discharges (Cont)	Illicit discharges abated Track	Yes	7 illicit discharges abated

**Comments:**

1. Information and data associated with the Illicit Discharge and Detection Program are provided in Appendix C.
2. Records and information are maintained in the Public Works Department.



### 3.3. Construction Site Runoff

Program Component	SWMP Activity Schedule		
	Required	Complied	Accomplished
Legal Authority	Erosion and Sediment Control Ordinance Update as needed	Yes	No update or revision required
	Subdivision Regulations Update as needed	Yes	No update or revision required
Permitting	Permit Application Requirements Update as needed	Yes	No update or revision required
	Permits issued Track	Yes	219 New Residential 18 New Commercial 235 Other Residential 59 Other Commercial
Plan Review	Construction Best Management Practices Plan (CBMPP) Requirements Update as needed	Yes	No update or revision required
	CBMPP Review Checklist and Procedures Update as needed	Yes	No update or revision required
Inspections	Inspection Requirements Update as needed	Yes	No update or revision required
	Inspection Form Update as needed	Yes	No update or revision required
	Inspections Track	Yes	415 General BMP 121 Monthly
Enforcement Actions	Enforcement Strategy Update as needed	Yes	No update or revision required
	Enforcement Tracking System Update as needed	Yes	Tracked through Citizenserve



Program Component	SWMP Activity Schedule		
	Required	Complied	Accomplished
Enforcement Actions (cont.)	Enforcement Actions Track	Yes	40 General BMP Failed Inspections 33 Verbal Warnings 10 Written Warnings 7 NOV Letters 1 Stop Work Order 1 Notice to ADEM
	Citizen Reporting Tools Update as needed	Yes	Available on City's website
	ADEM Notification Procedures Update as needed	Yes	No update or revision required
Training	QCI Training 1 / Year	Yes	5 Staff Certified 1 Consultant Certified

**Comments:**

1. Copies of the QCI training certificates are provided in Appendix D.
2. Supporting information for the Construction Site Runoff Program is provided in Appendix D.



### 3.4. Post-Construction Storm Water Management

Program Component	SWMP Activity Schedule		
	Required	Complied	Accomplished
Legal Authority	Post-Construction Storm Water Management Ordinance Update as needed	Yes	No update or revision required
	Zoning Ordinance Update as needed	Yes	No update or revision required
	Comprehensive Plan Update as needed	Yes	
	Subdivision Regulations Update as needed	Yes	
Permitting	Permit Application Requirements Update as needed	Yes	Requirements developed Effective 5 October 2018
	Permits issued Track	Yes	8 Stormwater permits
Plan Review	Post-Construction Storm Water Management Requirements Update as needed	Yes	Requirements developed Effective 5 October 2018
	Plan Review Checklist and Procedures Update as needed	Yes	Procedures Established Technical Memorandum developed Waiver Forms and Design Form developed
	Plans Reviewed Track	Yes	8 Projects reviewed 3 Waivers approved 5 BMPs approved
Post-Construction BMPs	As Built Certification Requirements Update as needed	Yes	Requirements developed Effective 5 October 2018
	BMP Inventory Track	Yes	No BMPs finished during permit year
	As Built Certification Requirements Track	Yes	No As Built Certifications during permit year



Program Component	SWMP Activity Schedule		
	Required	Complied	Accomplished
Maintenance	Maintenance Requirements Update as needed	Yes	Requirements developed Effective 5 October 2018
	Operations and Maintenance Agreements (OMA) Track	Yes	No OMAs during permit year
	Annual Inspections Track	Yes	No Annual Inspections during permit year
	Escrow Account Agreements Track	Yes	No Escrow Account Agreements during permit year

**Comments:**

1. Supporting information and data associated with the Post-Construction Storm Water Management Program are included in Appendix E.



### 3.5. Pollution Prevention and Good Housekeeping

Program Component	SWMP Activity Schedule		
	Required	Complied	Accomplished
Municipal Facilities	Inventory Update as Needed	Yes	6 Facilities
	Inspection Requirements Update as Needed	Yes	No update or revision required
	Inspections Track	Yes	6 Facilities Inspected
	Standard Operating Procedures (SOPs) Update as Needed	Yes	No update or revision required
	Training Program Update as Needed	Yes	New MS4 Training presentation developed
	Training Track	Yes	1 MS4 presentation 81 City staff
Roads	Ditch Debris Removal Track	Yes	162 loads of debris removed
	Litter Control Track	Yes	1,349 bags of litter
	Street Sweeping Track	Yes	2,335.05 yards of sweeping debris
	Deicing Events Track	Yes	0 events where sand was used
Pesticides, Herbicides and Fertilizers	PHF Storage Facility Inventory Update as Needed	Yes	2 Facilities
	Training Update as Needed	Yes	1 City staff is Certified Applicator
	Standard Operating Procedures (SOPs) Update as Needed	Yes	No update or revision required
	Chemical Inventory Track	Yes	Inventory is current
	Chemical Application Track	Yes	Daily Spray Log
	Chemical Disposal Track	Yes	No disposal required during permit year



**Comments:**

1. Supporting documentation for this program element is provided in Appendix F.



## SECTION 4

Summary of Proposed  
Program Changes





## 4. Summary of Proposed Program Changes

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### 4.1. SWMP Review and Update

During the preparation of this annual report, the SWMP Plan was reviewed. Parts of the SWMP Plan that have been updated as a result of this review are summarized below and provided in Appendix F.

- Table 1.1 SWMP Revision Record;
- Table 4.1 Public Education Program Goals;
- Table 5.4 Illicit Discharge Program Goals;
- Table 6.1 Construction Site Runoff Program Goals;
- Table 7.1 Post Construction Storm Water Management Program Goals;
- and,
- Table 8.4 Pollution Prevention and Good Housekeeping Program Goals.

A full copy of the latest version of the SWMP Plan is included electronically with this report.

### 4.2. Coordination with Surrounding Municipalities

If the City relies upon another city, county, State agency, or other entity to assist with the implementation of the SWMP, ADEM recommends that an inter-jurisdictional agreement between the city, county, State agency, or other entity be executed. Currently, the City does not rely on any other entity to perform any components of the City's SWMP Plan. Therefore, the City does not need or require inter-jurisdictional agreements with any neighboring city, county, and/or State agencies to be compliant with the NPDES Permit.



## SECTION 5

Fiscal Analysis



## 5. Fiscal Analysis

Permit Year 2019 is from 1 October 2018 through 30 September 2019. Many City Departments contribute to the City's SWMP. Since the City's budgeting process does not provided a detailed analysis of the City's effort regarding the stormwater program, the gross annual cumulative budget for departments that contribute to the stormwater program is summarized in Table 5.1.

**Table 5.1 Fiscal Analysis**

Department	2019 Budget	2020 Budget
Fire	\$ 7,124,591	\$ 7,104,240
Sanitation	\$ 2,612,944	\$ 2,628,342
Wastewater	\$ 18,641,359	\$ 9,741,138
Urban Management	\$ 1,603,017	\$ 1,617,490
Parks and Recreation	\$ 3,188,486	\$ 2,674,427
Engineering	\$ 1,145,947	\$ 1,850,700
Planning	\$ 805,970	\$ 1,153,215
Public Works	\$ 827,570	\$ 820,941
Facilities Maintenance	\$ 705,416	\$ 695,187
Vehicle Maintenance	\$ 412,042	\$ 407,489
Building	\$ 425,120	\$ 349,137
Total	\$ 37,492,462	\$ 29,042,306

The City's stormwater program is managed by the Public Works Department. For the 2019 Permit Year, the Public Works Department spent \$89,777 for the City's storm water management program. For the 2020 Permit Year, the City has budgeted approximately the same amount specifically for the storm water management program.

### **Comments:**

1. Cost associated with some existing City programs, salaries, and/or activities that are independent of the storm water program but may provide benefit(s)





to the stormwater program are not included in the storm water program budget. These items and/or activities are incorporated into the individual departments' budgets.

2. The City's final budget for 2019 and draft budget for 2020 are provided in Appendix H.