City of Prattville

101 West Main Street
Prattville, Alabama 36067

Municipal Separate Storm Sewer System (MS4)
2020 Annual Report

NPDES Permit No. ALS000010

January 2021

Prepared By:

HYDRO
ENGINEERING
SOLUTIONS

A DIVISION OF HYDRO, LLC

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SECTION 1

General Information

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.	Mayor
Name	Title

(signature)	11/20/2021
Signature	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:

Jonathan Larkin Public Works Assistant Director Stormwater Coordinator 101 West Main Street Prattville, AL 36067 (334) 595-0482	Dewayne Smith, P.E., CPESC, CPSWQ, CPMSM Consultant Hydro Engineering Solutions 2124 Moore's Mill Road, Suite 120 Auburn, AL 36830 (334) 740-6000
Brian Kane, P.E., CPESC Consultant Hydro Engineering Solutions 2124 Moore's Mill Road, Suite 120 Auburn, AL 36830 (334) 332-8035	

Any questions concerning the City of Prattville's (City) Municipal Separate Storm Sewer System (MS4) 2020 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 2019 through 30 September 2020 to comply with the NPDES Permit and the above listed five (5) program elements to the maximum extent practicable.

On 13 March 2020, a public health state of emergency was declared by the State Health Officer in response to the Covid-19 pandemic and subsequently an executive order was issued by Governor Kay Ivey effective 19 March 2020 in an effort to combat the virus. This "Safer at Home" order set restrictions on public, school and business gatherings and required many routine operations within the city to be evaluated and adjusted to limit exposure and mitigate the spread of Covid-19. As a result, desired goals of the MS4 program within the City were impacted negatively, but were met effectively.

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 35.49 square miles and is bordered on the east by the City of Millbrook. Approximately

17.81 square miles (50.2%) 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

AUTAUGA CREEK

PINE CREEK

NOLAND CREEK

N W E S

0 0.4 0.8 1.6 2.4 3.2
Miles

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

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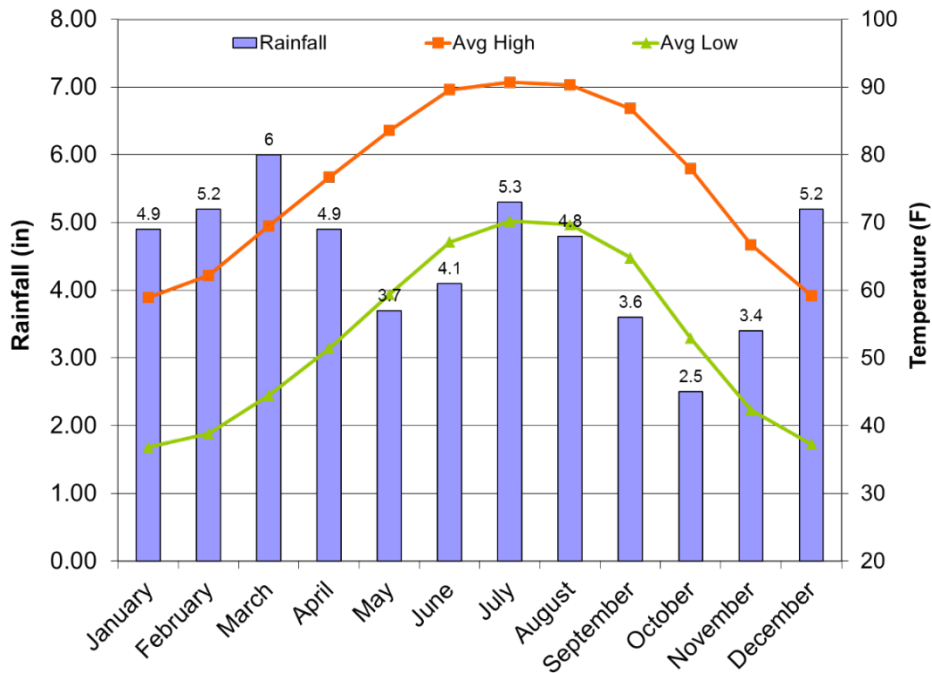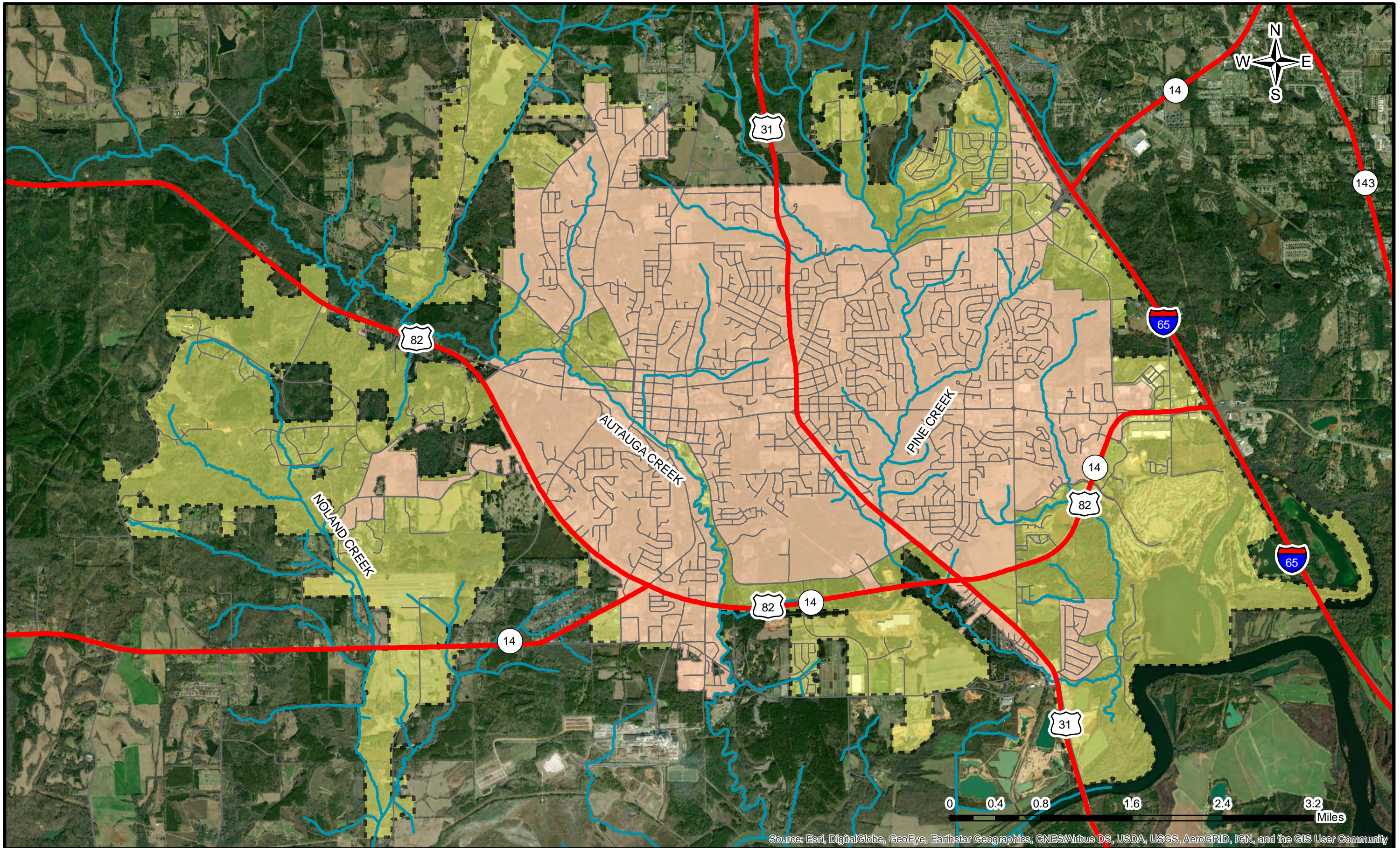
Prattville City Limits — Streets — Streams
Prattville MS4 Area — ALDOT Roads

CITY OF PRATTVILLE
City of Prattville MS4

Figure 1-2

September 2020

1.4.2. Population

Since becoming 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. The 2019 estimate for total population is approximately 35,957 residents, indicating a population increase of 1,997 (approximately 5.9%) over the past nine (9) years.

Figure 1.3 Historical Population
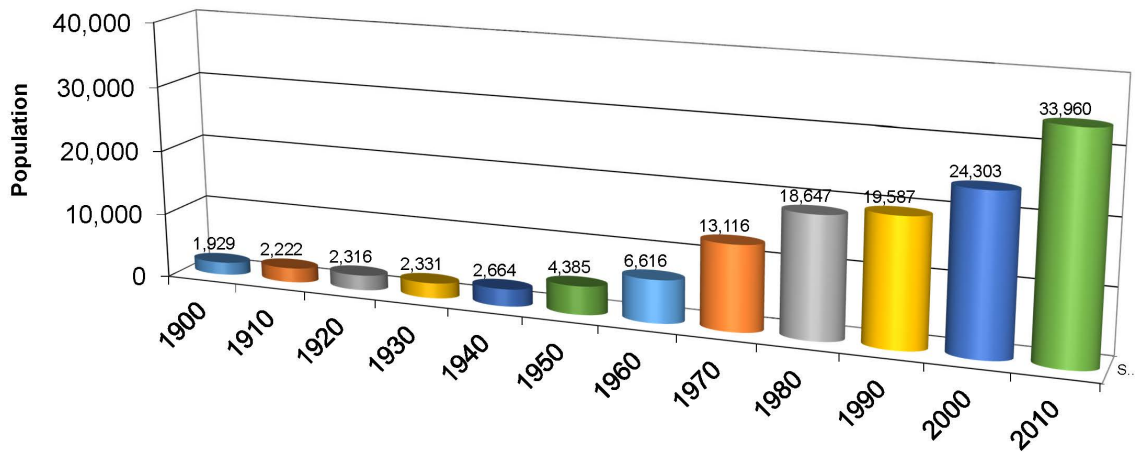
1.4.3. Land Use

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.
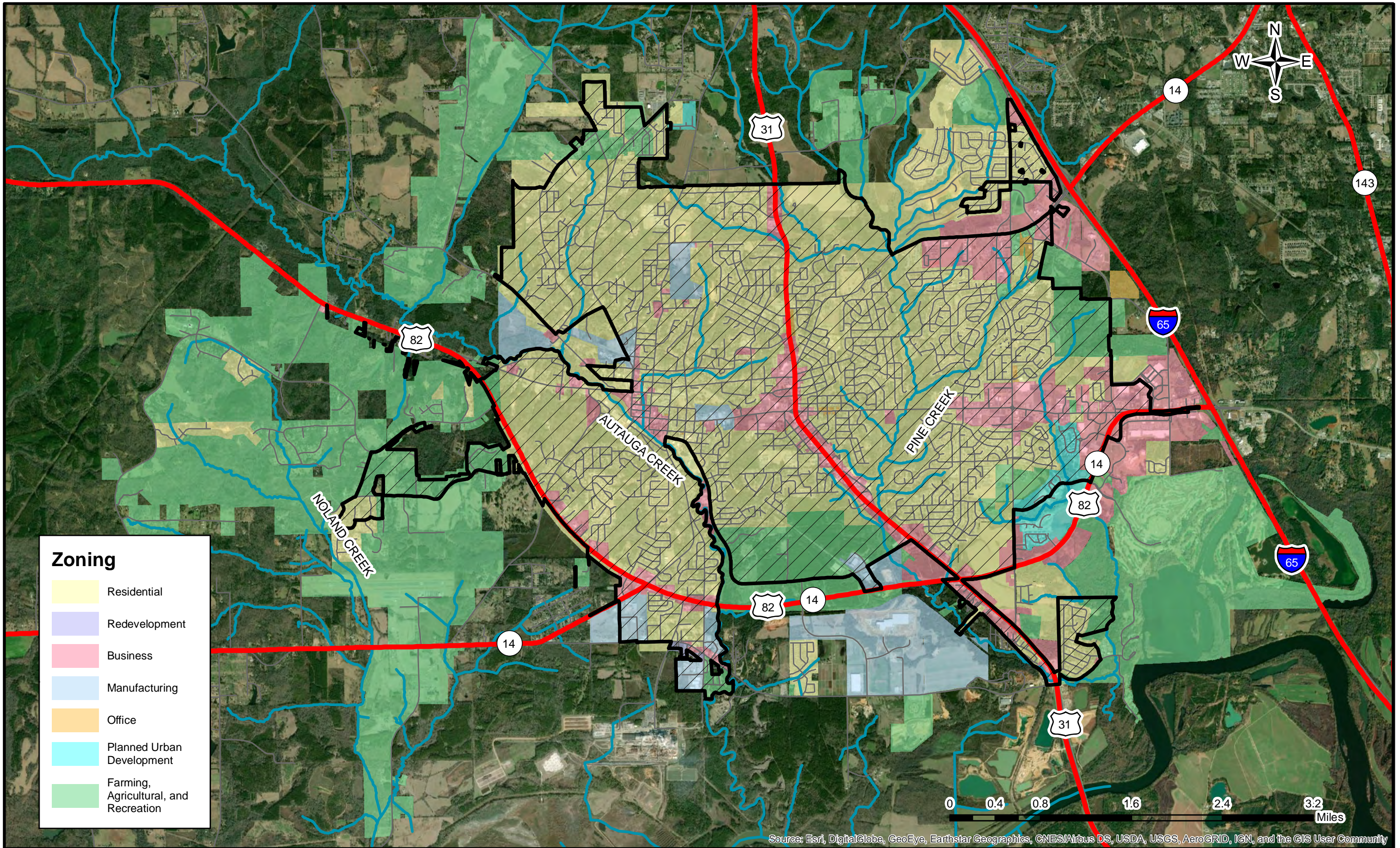
Zoning

- Residential
- Redevelopment
- Business
- Manufacturing
- Office
- Planned Urban Development
- Farming, Agricultural, and Recreation

NOLAND CREEK

AUTAUGA CREEK

PINE CREEK

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

0   0.4   0.8   1.6   2.4   3.2
Miles

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Prattville MS4 Area — Streets

ALDOT Roads — Streams

CITY OF PRATTVILLE
Land Use Summary

Figure 1-4

September 2020

Table 1.1 Zoning Districts

District	City		MS4 Area	
	Area (mi^2)	Area (%)	Area (mi^2)	Area (%)
Residential	15.552	43.8	12.923	72.6
Redevelopment	0.028	0.1	0.022	0.1
Business	3.662	10.3	2.250	12.6
Manufacturing	1.808	5.1	0.465	2.6
Office	0.110	0.3	0.059	0.3
Planned Unit Development	0.424	1.2	0.172	1.0
Agriculture	13.906	39.2	1.919	10.8
Total	35.490	100.0	17.809	100.0

1.5. Known Problems

According to ADEM's 2020 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

2.1. 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. 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.

2.2.1. 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 support the City's SWMP include the following:

Autauga Creek Improvement Committee (ACIC)
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/
- Water Festival organization.

Alabama Soil and Water Conservation Committee (ASWCC)
www.alconsevationdistricts.gov
- ASWCC provides the City with technical resources to support various program components.

ADEM
www.adem.alabama.gov
- 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.

2.2.2. Website

The City has developed a website (http://www.prattvilleal.gov/) that provides 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)
- Erosion and Sediment Control

- Post Construction Stormwater Runoff

- Stormwater Resources
    - How Can YOU Prevent Stormwater Pollution?
    - EPA Educational Materials
    - Brochures, guides, and booklets

- Sanitation
    - Household garbage collection
    - Yard trash collection
    - 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 A.

2.2.3. 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.

The City currently maintains the following social media platforms.

- Facebook: https://www.facebook.com/PrattvilleALgov/;
- Twitter: https://twitter.com/PrattvilleALgov;
- YouTube: https://www.youtube.com/user/PrattvilleALgov/; and,
- Instagram: https://www.instagram.com/PrattvilleALgov/.

Figure 2.1 City Social Media Pages
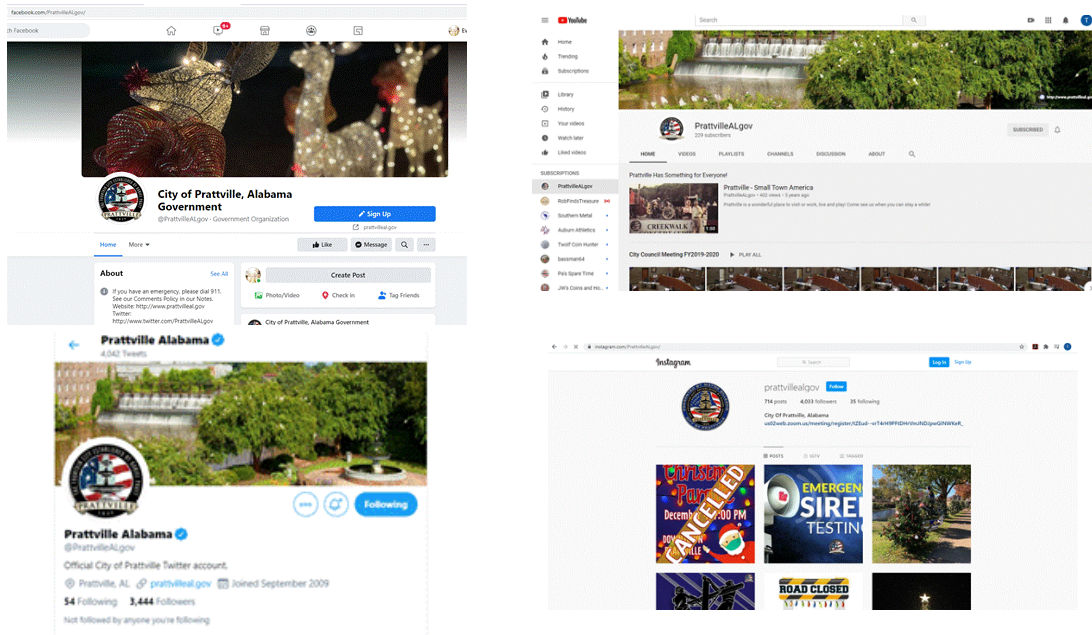
To show the effectiveness of social media in communicating with the public, Figure 2.2 provides a chart depicting the steady growth in the number of people following the City's social media sites. This chart shows that residents are seeking information about City events, programs, and schedules through 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 Social Media Followers
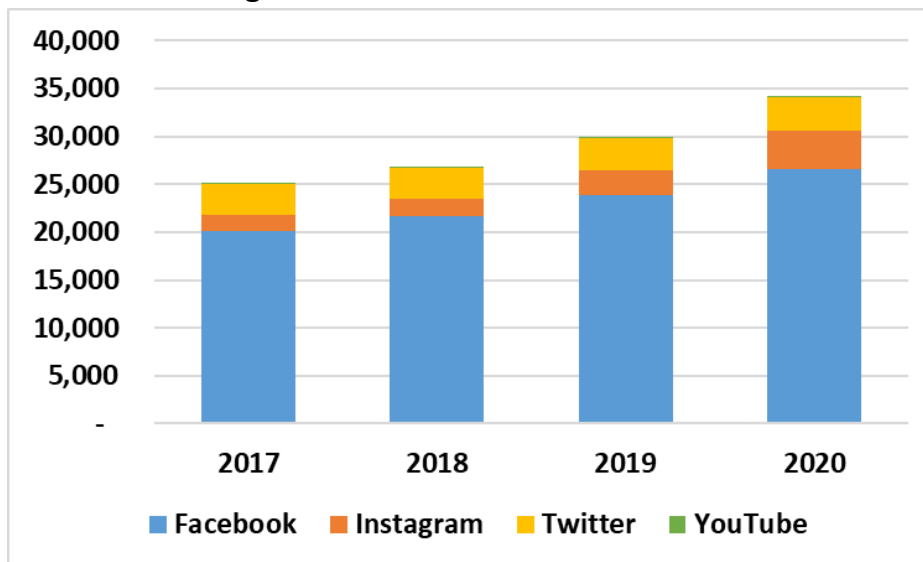
2.2.4. Public Service Announcements

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=ct5bOi3tRCY

  - https://www.youtube.com/watch?v=sj3el4U7-Ic

  - https://www.youtube.com/watch?v=YZWOgbY4LD8

- Garbage Can Tips – The City provided a YouTube video showing proper can placement, how to dispose of garbage in the can, and where instructions are located on the can. This may increase proper usage of cans and could potentially decrease stray litter. The YouTube feed is available at: https://www.youtube.com/watch?v=bOaN-dN3wTg.

- Recycling in Our Community – During the permit year, the City published a video describing the four different ways City residents can recycle. Recycling is available through curbside pickup, drop off at the Recycling Center, drop off at recycling dumpsters located throughout the City, and simply placing recyclables in the garbage. More detail of the City's recycling program is discussed in Section 2.3.4. The YouTube feed is available at: https://www.youtube.com/watch?v=FTAQb6XyaEQ.

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

2.2.5. 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 "Storm water 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 A. Table 2.1 provides a summary of the brochures that have been developed.

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).

Due to the state's "Safer at Home" order because of the COVID-19 pandemic, the City curtailed many public functions during the permit year, limiting the physical distribution of educational material.

2.2.1. Training

On 26 June 2020, the City's Storm Water Coordinator gave a presentation to five (5) City employees from the Planning Department about the City's MS4 program. The presentation included reviewing the City's MS4 information listed on the website, components of the MS4, and various procedures and forms. A copy of the employee training sign-in sheet is provided in Appendix E. Due to the state's "Safer at Home" order because of the COVID-19 pandemic, in-person training was limited during the permit year.

Table 2.1 Brochures

Description	Target Pollution Source	Target Audience	Distribution
Brochures			
Storm Drain Stewardship	General Information	Homeowners Renters Schools Business Owners Contractors Professionals Developers	Website
Fact Sheets			
Protecting Water Quality from Urban Runoff	General Information	Homeowners Renters Schools Business Owners Contractors Professionals Developers	Website
Booklets			
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
Posters			
Stormwater and the Construction Industry	Construction Site Runoff ESC Plans BMP Maintenance	Contractors Professionals Developers	Website

2.3. 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.

2.3.1. 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 (7) 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.

2.3.2. 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 as 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.autaugacreek.org. Selected brochures developed and distributed by ACIC are provided in Appendix A.

Figure 2.3 Autauga Creek Blueway Trail

2.3.3. 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. Due to the "Safer at Home" order issued because of the Covid-19 pandemic, the Autauga County Water Festival was canceled as schools were closed during the typical Festival dates.

2.3.4. Recycling

The City 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. For this permit year, approximately 11,576 tons of recyclable material was recovered for the City through the RePower South facility.

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 389 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 2.4.

Figure 2.4 Recycling Locations

Prattville Recycling Center   Overlook Park

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

2.3.1. 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 2.5.

Figure 2.5 Pet Waste Disposal Station

2.3.2. 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). Due to the "Safer at Home" order issued because of the COVID-19 pandemic, cleanup activities were not scheduled.

2.4. 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 2.6.

2.4.1. 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 was not revised or updated during this permit year.

2.4.2. Public Education

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

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://prattvilleal.gov/helpdesk/citizen-helpdesk.html. This reports citizen complaints through the City's online portal and distributes requests to associated Departments automatically.

2.4.1. Outfall Inventory

The City continued efforts to locate, map, and screen storm water outfalls during the permit year. During this permit year, 130 outfalls have been located and evaluated for the presence of non-stormwater discharges. The City completed the area in Figure 2.6 designated for permit year 2020. 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.
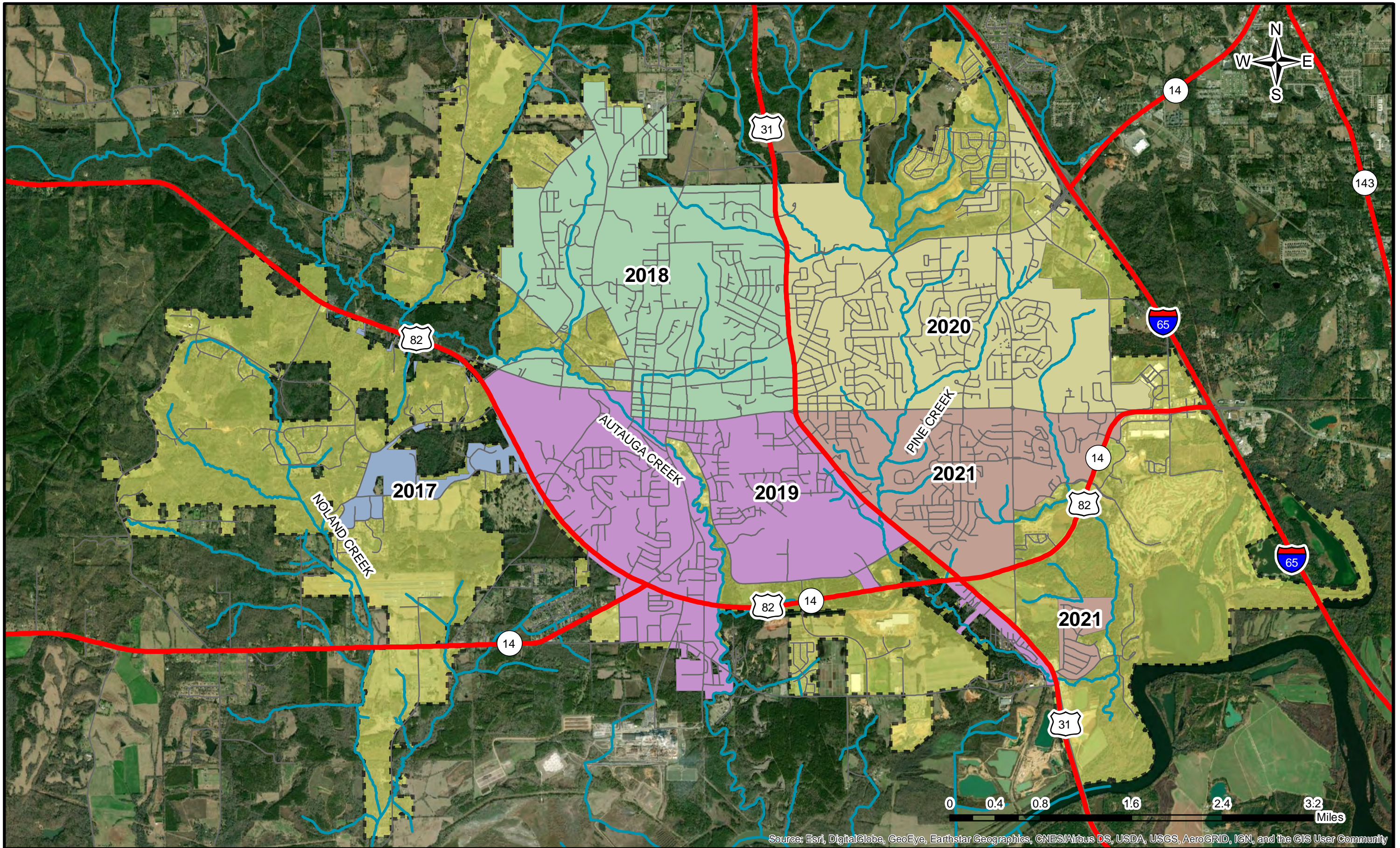
City of Prattville — Outfall Mapping and Screening Schedule

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

Map labels: 2017, 2018, 2019, 2020, 2021, 2021, NOLAND CREEK, AUTAUGA CREEK, PINE CREEK

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

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CITY OF PRATTVILLE
Outfall Mapping and Screening Schedule

Figure 2-6

September 2020

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 2.7. A summary of the outfalls screened from 1 October 2019 through 30 September 2020 is provided in Table 2.2 and shown in Figure 2.8. Copies of the outfall mapping forms are provided in Appendix B.

Figure 2.7 ArcGIS Collector Application Screenshot
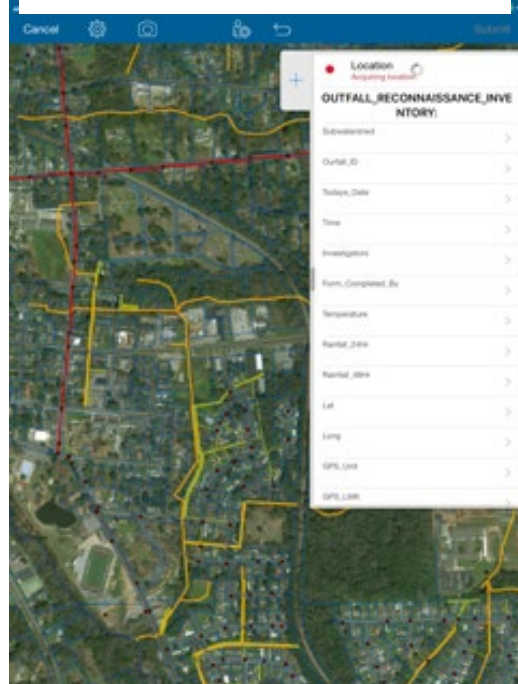
Table 2.2 2020 Outfalls Screened by Watershed

Watershed	Total	2017	2018	2019	2020	2021
Noland Creek	4	4				
Autauga Creek	192		92	100		
Pine Creek	156	3	19		128	
Fay Branch	2				2	
Totals	348	7	111	100	130	

2.4.1. Priority Areas

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

Outfalls
- ● 2017 Outfalls (7)
- ● 2018 Outfalls (111)
- ● 2019 Outfalls (100)
- ● 2020 Outfalls (136)

NOLAND CREEK
AUTAUGA CREEK
PINE CREEK
FAY BRANCH

0   0.425   0.85   1.7   2.55   3.4
Miles

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

HYDRO ENGINEERING SOLUTIONS

- Prattville City Limits
- ALDOT Roads
- Streams
- Prattville MS4 Area
- Streets

CITY OF PRATTVILLE
Outfall Inventory

Figure 2-8

September 2020

2.4.2. Training

On 26 June 2020, the City's Storm Water Coordinator gave a presentation to five (5) City employees from the Planning Department about the City's MS4 program. The presentation included reviewing the City's MS4 information listed on the website, components of the MS4, and various procedures and forms. A copy of the employee training sign-in sheet is provided in Appendix E. Due to the state's "Safer at Home" order because of the COVID-19 pandemic, in-person training was limited during the permit year.

The City's Storm Water Coordinator is experienced in non-storm water discharge location, investigation, illicit discharge determination and abatement. The Storm Water Coordinator performs all outfall screening and illicit discharge investigations within the City's MS4. Investigations conducted by the City are described in the "Illicit Discharge Investigations" section of this report.

2.4.3. Illicit Discharge Investigations

The City investigated five (5) 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.

- 410 East Main Street – The City Storm Water Coordinator observed an appliance repair shop washing appliances improperly, causing wash water to enter the nearby creek. The Stormwater Manager explained the issue to the present employees and the business resolved the issue.

- Meharry Street – The City Storm Water Coordinator observed a tire dump while inspecting an unrelated issue. No suspected violator was apparent. The Stormwater Manager notified the Urban Management Department, and the tires were removed the next day.

- 901 Doster Road – The City Storm Water Coordinator observed red mud on a hillside next to a commercial facility. The facility is located outside the City's MS4 but is in the City Limits. The Stormwater Manager explained the issue to the facility ownership. The original facility contractor said they would retrofit the existing outfall standpipe to address the issue.

- Graham Haven Lake – ADEM notified the City of a complaint regarding an oil sheen on pond in a residential subdivision. The City Storm Water Coordinator investigated the same day as the notification but could only find

traces of oil residue and sheen near the tributary and upstream watershed. The source was not apparent.

- 400 South Memorial Drive – The City received a citizen complaint pertaining to a restaurant dumping grease into the parking lot. The City Storm Water Coordinator inspected and issued a Notice of Violation (NOV). There were no grease trap cleaning records on site, the roof drain was tied to the sanitary sewer, and continual grease dumping has clogged an adjacent storm water inlet.

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 B. A comparison of complaints received during the past four (4) 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.

2.4.1. 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.

Table 2.3 Complaint Types by Permit Year

Complaint Type	2017	2018	2019	2020	Total
Sanitary Sewer	1	4	5		10
Illegal Dumping/Trash	2	1	1	1	5
Oil/Household Hazardous Waste	1	2		1	4
Construction Site Runoff	2				2
Restaurant/Grease		1	1	1	3
Wash Water		1		1	2
Ditch Erosion		1		1	2
Other/No Discharge		1			1
Totals	6	11	7	5	29

Table 2.4 Reporting Mechanism by Permit Year

Reporting Mechanism	2017	2018	2019	2020	Total
Phone Call	1	3	5	1	10
Contact Mayor	2	1	1		4
City Employee	3	4	1	3	11
Social Media		1			1
ORI		1			1
ADEM		1		1	2
Totals	6	11	7	5	29

2.5. Construction Site Runoff

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

2.5.1. Legal Authority

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

2.5.2. 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.

2.5.1. Training and Certification

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

2.5.2. 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.

2.5.3. Inspections

The City has a form for construction site BMP inspections and a general erosion and sediment control plan for residential construction. There were no revisions or updates to either from during this permit year. Copies of the Construction Site Inspection Form and General Residential BMP standard details are contained in Appendix E of the SWMP Plan.

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 of a Citizen Serve inspection is provided in Appendix C. A summary of BMP inspections performed through Citizen Serve is provided in Appendix C.

2.5.4. Enforcement

Occasionally, the City shall request that ADEM enforce compliance with NPDES permittees in non-compliance. Enforcement actions taken by the City during this permit year include the following:

- Forty (40) General BMP inspections with deficiencies noted and maintenance required;

- Twenty-four (24) failed General BMP Inspections requiring Re-inspection;

- Three (3) Verbal Warnings;

- Three (3) Written Warnings;

- One (1) Notice of Violation (NOV) Letter; and,

- One (1) Stop Work Order.

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

2.5.5. 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.

2.6. 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.

2.6.1. Legal Authority

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

2.6.2. Post-Construction Technical Memorandum

The City's Post-Construction Storm Water Ordinance establishes design standards through a Design Memorandum. The City developed a technical memorandum describing how it will implement a post-construction storm water management program for qualifying new development or redevelopment. 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. To document design information for post-construction BMPs, the City has developed design forms for BMPs that include detention ponds, retention ponds, underground detention, bioretention areas, and hydro dynamic separators. Copies of the design forms are provided in Appendix E. Components of the technical memorandum include the following:

- Overview;
- Applicable Developments;
- Implementation;
- Waiver Request;
- Water Quality Requirements;
- Low Impact Development;

- Design Standards;
- As-Built Certification;
- Annual Inspections;
- Homeowner's Association (HOA) Requirements; and,
- Operation and Maintenance.

The technical memorandum was finalized and became effective on 5 October 2018. The City updated the Technical Memorandum on 21 March 2020 to include updated design, annual inspection, and operations and maintenance requirements. A copy of the Technical Memorandum is provided in Appendix D.

2.6.3. 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. The City updated the Waiver Request forms on 21 March 2020 to include supplemental instructions.

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 D. The City reviewed and approved three (3) Waiver Requests during the permit year.

2.6.4. 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.

2.6.5. 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*.

2.6.6. 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.

On 21 March 2020, the City updated the Program's existing Design Forms and added three (3) new Post-Construction BMP Design Forms. New Design Forms for Underground Detention, Bioretention Area, and Hydrodynamic Separator BMPs were developed and became effective during the permit year.

During the permit year, ten (10) development projects using the Design Form in the Technical Memo were received by the City and reviewed. Within the projects, fifteen (15) Post-Construction BMP Design Forms were submitted. The City approved twelve (12) of these BMPs for construction. Copies of the Design Forms are provided in Appendix D.

2.6.7. 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, As-Built Certification Forms were 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 appropriate As-Built Certification Form.

On 21 March 2020, the City updated the Program's existing As-Built Certification Forms and added three (3) new Post-Construction As-Built Certification Forms. New As-Built Certification Forms for Underground Detention, Bioretention Area, and Hydrodynamic Separator BMPs were developed and became effective during the permit year.

During the permit year, seven (7) As-Built Certifications were received by the City, reviewed, and approved for either a Certificate of Occupancy (CO) or final plat approval. Copies of the As-Built Certification Forms are provided in Appendix D.

2.6.8. 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 D. The City received six (6) OMAs during the permit year.

2.6.9. 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.

On 21 March 2020, the City updated the Program's existing Annual Inspection Forms and added three (3) new Annual Inspection Forms. New Annual Inspection Forms for Underground Detention, Bioretention Area, and Hydrodynamic Separator BMPs were developed and became effective during the permit year.

Copies of the Annual Inspection Forms are provided in Appendix E. The City received one (1) Annual Inspection Form during the permit year.

2.6.10. Maintenance Escrow Agreement

For residential subdivisions with Homeowner'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.

On 21 March 2020, the City updated the Escrow Account / Maintenance Request Form. A copy of the Escrow Account Agreement and Escrow Account / Maintenance Request Form is provided in Appendix D. The City received three (3) Escrow Account / Maintenance Request Forms during the permit year.

2.6.11. Post-Construction BMP Inventory

The City created an inventory of the constructed and certified Post-Construction BMPs during the permit year, as shown in Figure 2.9. This inventory only includes BMPs that have been constructed, submitted an As-built Certification form, and received a Certificate of Occupancy or final plat.
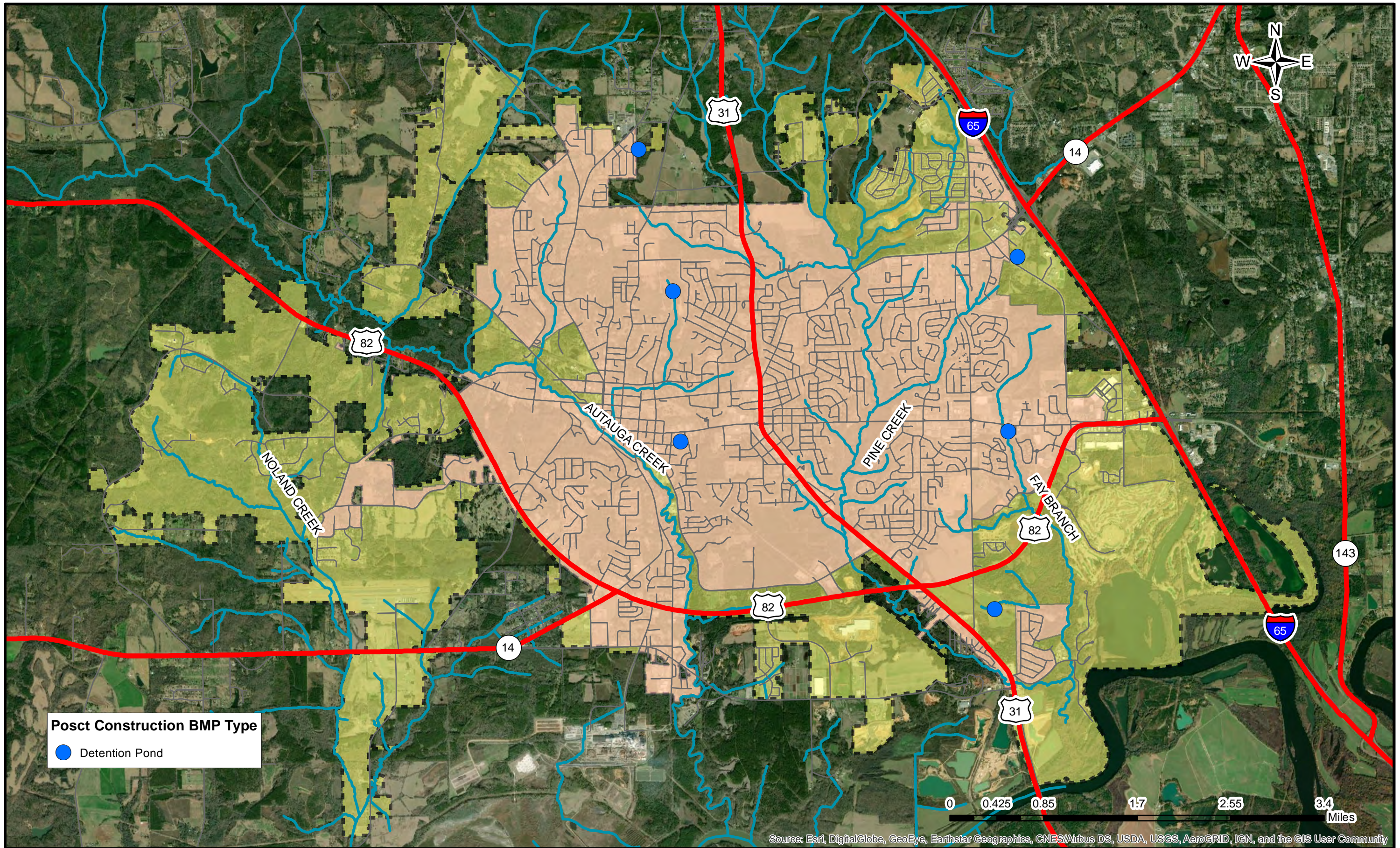
CITY OF PRATTVILLE
Post Construction BMP Inventory

Figure 2-9

September 2020

Posct Construction BMP Type

● Detention Pond

Prattville City Limits — ALDOT Roads — Streams

Prattville MS4 Area — Streets

HYDRO ENGINEERING SOLUTIONS

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

0   0.425   0.85   1.7   2.55   3.4
Miles

2.7. 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.

2.7.1. 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 102 properties that consist of support facilities, parks, ball fields, and building grounds that occupy approximately 1,080 acres (1.6871 square miles).

2.7.1.1. 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
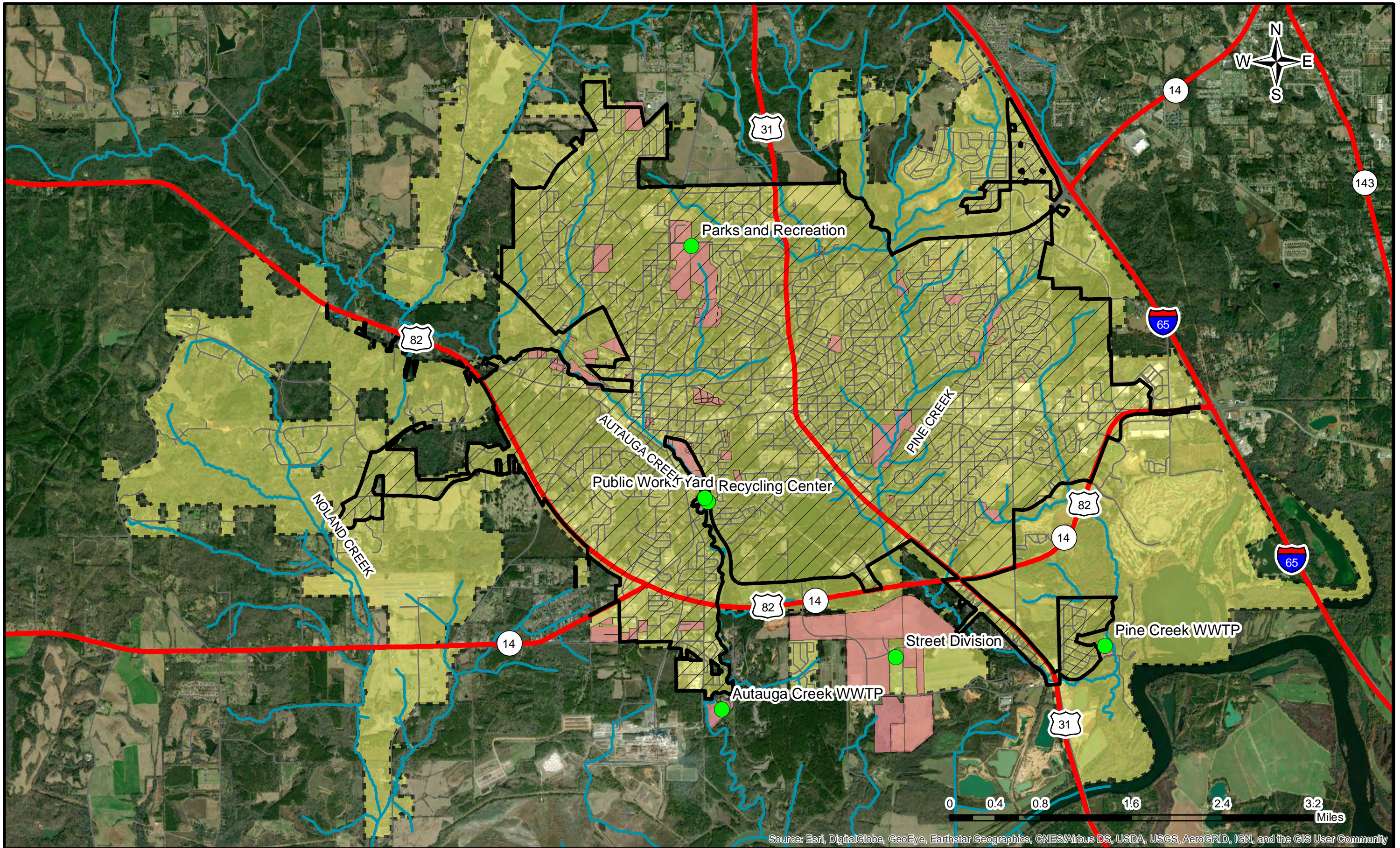
Parks and Recreation

AUTAUGA CREEK

PINE CREEK

NOLAND CREEK

Public Works Yard **Recycling Center**

Street Division

Pine Creek WWTP

Autauga Creek WWTP

0 0.4 0.8   1.6   2.4   3.2
Miles

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

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HYDRO ENGINEERING SOLUTIONS

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

CITY OF PRATTVILLE

Municipal Facility Inventory

Figure 2-10

September 2020

2.7.1.2.   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 E.

2.7.1.3.   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.

2.7.1.4.   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:

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City of Prattville
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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 E.

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 Work Log for each of the crews. Examples of the checklists are provided in Appendix F.

2.7.1.5.   Training

On 26 June 2020, the City's Storm Water Coordinator gave a presentation to five (5) City employees from the Planning Department about the City's MS4 program. The presentation included reviewing the City's MS4 information listed on the website, components of the MS4, and various procedures and forms. A copy of the employee training sign-in sheet is provided in Appendix E. Due to the state's "Safer at Home" order because of the COVID-19 pandemic, in-person training was limited during the permit year.

2.7.2.   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.

2.7.2.1.   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
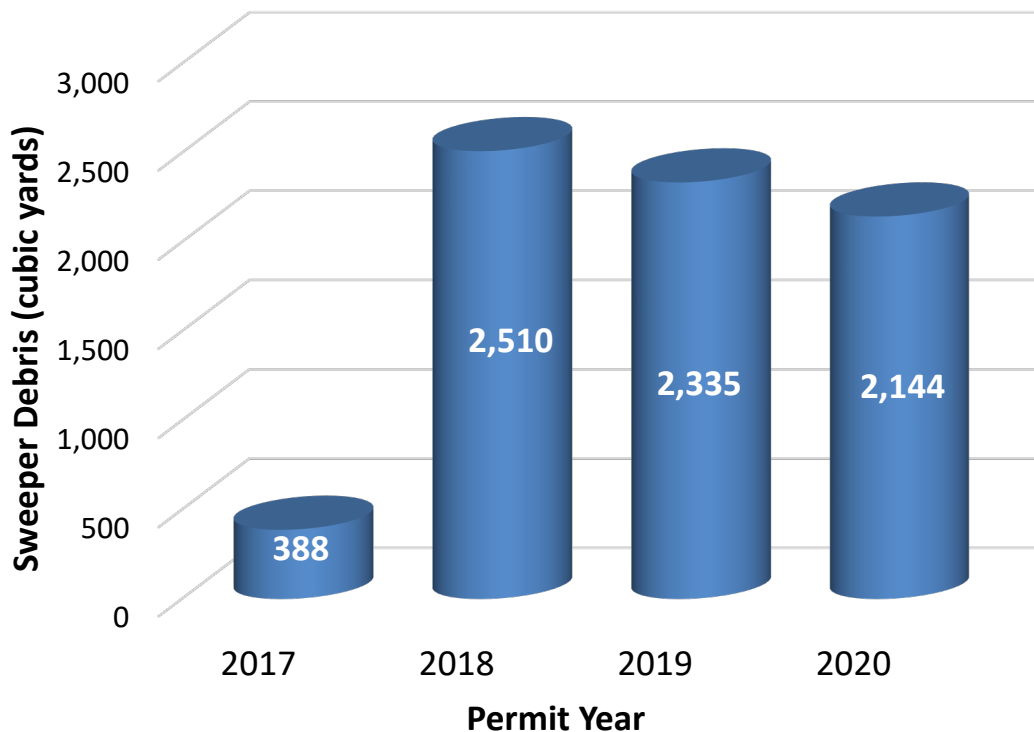
2.7.2.2. Litter Control

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
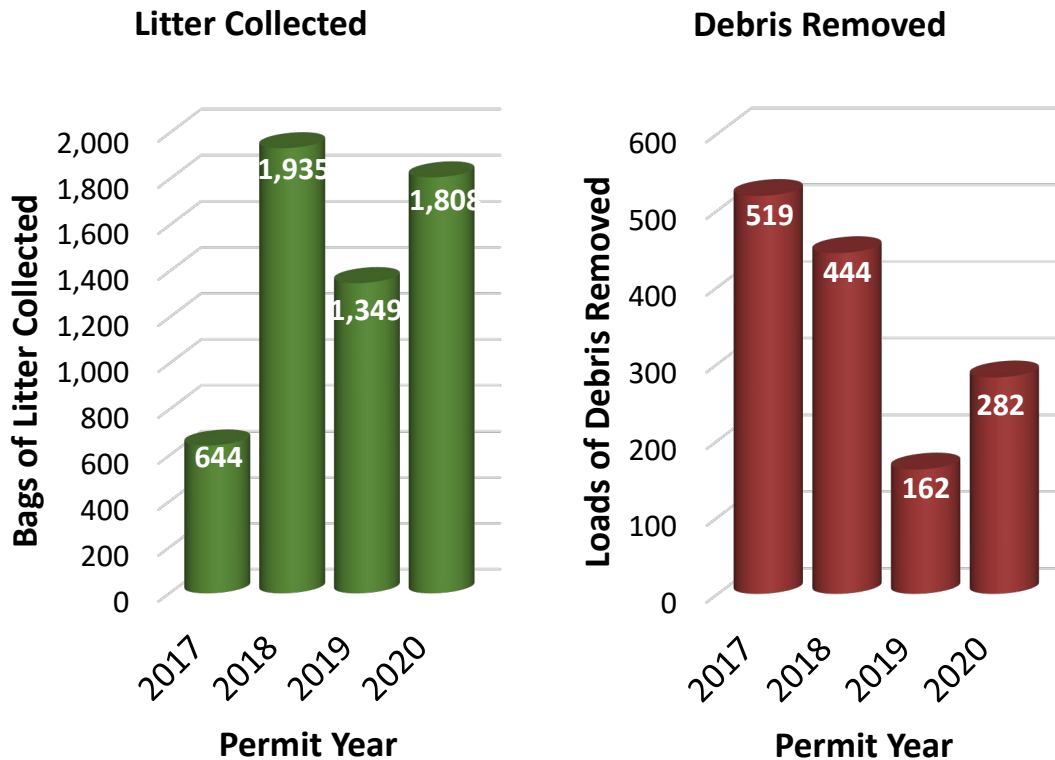
2.7.2.3.   Deicing Activities

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.

2.7.3.   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.

2.7.3.1.   PHF General NPDES Permit

In January 2017, the City was granted authorization under ADEM's General NPDES Permit No. ALG870012 for discharges associated with the application of pesticides. Since the City sprays over 6,400 acres for mosquito control, the City was required to obtain coverage under this permit. As required by the permit, the City has developed and implemented a Pesticide Discharge Management Plan.

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

2.7.3.2.   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.

2.7.3.3.   Facility Inventory

The City maintains approximately 102 properties that consist of support facilities, parks, ball fields, and building grounds that occupy approximately 1,080 acres (1.6871 square miles). The locations of City Property are shown in Figure 2.10.

2.7.3.4. 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.

2.7.3.5. Certification and Licensing

Chemical application is either performed by the Public Works Department or the Parks and Recreation Department. The City has four (4) staff that are certified as a commercial applicator. Copies of the current certifications are provided in Appendix E.

2.7.3.6. 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 E.

2.7.3.7. 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. Copies of the application log and an example are provided in Appendix E.

2.7.3.8. 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.

2.8. 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.

2.9. 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.

2.9.1. 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.

2.9.2. 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.

2.9.3. 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 354 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 an effective SWMP to protect the natural resources within the City.

SECTION 3

Summary Tables

The purpose of the table is to document in a concise form the program activities and the permitee'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
			    26,561 Followers
			Twitter
			    3,444 Followers
			Youtube Channel
			    228 Subscribers
			Instagram
			    4,033 Followers

	Brochures Track	Yes	Available on Website 1 Brochure 1 Fact Sheet 3 Booklets 1 Poster
	Public Service Announcements Track	Yes	5 Public Service Announcements available online
	Training Track	Yes	1 MS4 presentation 5 City staff
Public Involvement (Minimum of 1 activity / year)	Citizen Reporting Tool Track	Yes	Available on City's website
	Water Festival Track	No	Event cancelled due to COVID-19 pandemic

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 389 tons Single-stream Recycling 11,576 tons
	Public Events Track	No	CityFest cancelled due to COVID-19 pandemic

Comments

1. Supporting information, documentation, and data summarized in the table are provided in Appendix A.

2. Records and information are maintained in the Public Works Department.

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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	130 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 5 City Staff
	Complaints Track	Yes	5 Complaints
	Illicit discharge investigations Track	Yes	5 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	5 illicit discharges abated

Comments:

1. Information and data associated with the Illicit Discharge and Detection Program are provided in Appendix B.

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	302 New Residential 8 New Commercial 209 Other Residential 61 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	552 General BMP 221 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	24 General BMP Failed Inspections 3 Verbal Warnings 3 Written Warnings 1 NOV Letters 1 Stop Work Order 0 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 C.

2. Supporting information for the Construction Site Runoff Program is provided in Appendix C.

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 updated 21 March 2020
	Plan Review Checklist and Procedures Update as needed	Yes	Technical Memorandum updated Waiver Forms and Design Forms updated
	Plans Reviewed Track	Yes	14 Projects reviewed 3 Waivers approved 12 BMPs approved 3 BMPs denied
Post-Construction BMPs	As Built Certification Requirements Update as needed	Yes	Requirements updated 21 March 2020
	BMP Inventory Track	Yes	7 BMPs finished during permit year
	As Built Certification Requirements Track	Yes	7 BMP As Built Certifications during permit year

Program Component	SWMP Activity Schedule		
	Required	**Complied**	**Accomplished**
Maintenance	Maintenance Requirements Update as needed	Yes	Requirements updated 21 March 2020
	Operations and Maintenance Agreements (OMA) Track	Yes	6 OMAs during permit year
	Annual Inspections Track	Yes	1 Annual Inspection during permit year
	Escrow Account Agreements Track	Yes	3 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 D.

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	No update or revision required
	Training Track	Yes	1 MS4 presentation 5 City staff
Roads	Ditch Debris Removal Track	Yes	282 loads of debris removed
	Litter Control Track	Yes	1,808 bags of litter
	Street Sweeping Track	Yes	2,144 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	4 City staff are Certified Applicators
	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

<u>Comments:</u>

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

SECTION 4

Summary of Proposed Program Changes

4.1. SWMP Review and Update

During the preparation of this annual report, the SWMP Plan was reviewed. Since all revisions were administrative, the City was not required to seek public input. There were no additions or deletions of the type of BMPs presented in the SWMP Plan. 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

Permit Year 2020 is from 1 October 2019 through 30 September 2020. 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 storm water 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	2020 Budget	2021 Budget
Fire	$ 7,134,230	$ 7,352,350
Sanitation	$ 3,186,717	$ 3,558,100
Wastewater	$ 9,741,138	$ 12,526,713
Urban Management	$ 1,617,490	$ 1,792,842
Parks and Recreation	$ 2,592,610	$ 2,852,432
Engineering	$ 1,565,581	$ 1,448,504
Planning	$ 1,142,386	$ 1,021,540
Public Works	$ 820,941	$ 1,129,551
Facilities Maintenance	$ 708,813	$ 1,045,496
Vehicle Maintenance	$ 416,069	$ 379,743
Building	$ 349,137	$ 373,487
Total	$ 29,275,112	$ 33,480,758

The City's stormwater program is managed by the Public Works Department. For the 2020 Permit Year, the Public Works Department spent $86,744 for the City's storm water management program. For the 2021 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 2020 and draft budget for 2021 are provided in Appendix F.