
City of Prattville

101 West Main Street
Prattville, Alabama 36067



Municipal Separate Storm Sewer System (MS4) 2022 Annual Report

NPDES Permit No. ALS000010

January 2023

Prepared By:



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



Table of Contents

1. General Information	1-1
1.1. Signatory Requirements	1-1
1.2. List of Contacts	1-2
1.3. Overview and Summary.....	1-2
1.4. MS4 Area	1-3
1.4.1. Climate	1-4
1.4.2. Population	1-6
1.4.3. Land Use	1-6
1.5. Known Problems.....	1-8
2. Program Evaluation	2-1
2.1. Program Objectives	2-1
2.2. Public Education	2-1
2.2.1. Local Partnerships.....	2-2
2.2.2. Website.....	2-2
2.2.3. Social Media.....	2-3
2.2.4. Public Service Announcements	2-5
2.2.5. Brochures	2-6
2.2.1. Training.....	2-8
2.3. Public Involvement.....	2-8
2.3.1. Citizen Reporting Tools.....	2-8
2.3.2. Autauga Creek Improvement Committee (ACIC).....	2-8
2.3.3. Autauga County Water Festival	2-9
2.3.4. Recycling.....	2-10
2.3.1. Pet Waste Stations.....	2-11
2.3.2. Autauga PALS Cleanups.....	2-12
2.4. Illicit Discharge Detection and Elimination (IDDE).....	2-12
2.4.1. Legal Authority	2-12
2.4.2. Public Education.....	2-12
2.4.1. Citizen Reporting Tools	2-12
2.4.1. Outfall Inventory	2-13
2.4.1. Priority Areas.....	2-15
2.4.2. Training.....	2-16
2.4.3. Illicit Discharge Investigations	2-16
2.4.1. Grease Control Program	2-17
2.5. Construction Site Runoff	2-18
2.5.1. Legal Authority	2-18
2.5.2. Permitting and Plan Review	2-18
2.5.1. Training and Certification	2-18
2.5.2. Education and Training Materials.....	2-19
2.5.3. Inspections	2-19
2.5.4. Enforcement	2-19
2.5.5. Public Reporting	2-19
2.6. Post-Construction Storm Water Management.....	2-20
2.6.1. Legal Authority	2-20



2.6.2.	Post-Construction Technical Memorandum	2-20
2.6.3.	Waiver Request	2-21
2.6.4.	Water Quality Requirements	2-21
2.6.5.	Low Impact Development	2-21
2.6.6.	Post-Construction BMP Plan Review	2-22
2.6.7.	As-built Certification	2-22
2.6.8.	Operation and Maintenance Agreement	2-22
2.6.9.	Annual Inspection	2-23
2.6.10.	Maintenance Escrow Agreement	2-23
2.6.11.	Post-Construction BMP Inventory	2-24
2.6.1.	Workshop	2-24
2.7.	Pollution Prevention and Good Housekeeping	2-24
2.7.1.	Municipal Facilities	2-26
2.7.1.1.	Facility Inventory	2-26
2.7.1.2.	Facility Inspections	2-26
2.7.1.3.	Standard Operating Procedures	2-28
2.7.1.4.	Training	2-28
2.7.2.	Litter Program	2-28
2.7.2.1.	Events	2-28
2.7.2.2.	Street Sweeping	2-29
2.7.2.3.	Litter Control	2-29
2.7.2.4.	Deicing Activities	2-31
2.7.2.5.	Trash Receptacles	2-31
2.7.2.6.	Enforcement	2-31
2.7.3.	Pesticide, Herbicide, and Fertilizer	2-31
2.7.3.1.	PHF Standard Operating Procedures	2-32
2.7.3.2.	PHF Storage Facilities	2-32
2.7.3.3.	Certification and Licensing	2-32
2.8.	Monitoring Activities	2-32
2.9.	Program Evaluation	2-33
2.9.1.	Strengths	2-33
2.9.2.	Weaknesses	2-34
2.9.3.	Effectiveness	2-34
3. Summary Tables		3-1
3.1.	Public Education and Public Involvement	3-1
3.2.	Illicit Discharges and Improper Disposal	3-3
3.3.	Construction Site Runoff	3-5
3.4.	Post-Construction Storm Water Management	3-7
3.5.	Pollution Prevention and Good Housekeeping	3-9
4. Summary of Proposed Program Changes		4-1
4.1.	SWMP Review and Update	4-1
4.2.	Coordination with Surrounding Municipalities	4-1
5. Fiscal Analysis		5-1



List of Tables

Table 1–1 Contact List..... 1-2

Table 1–2 Zoning Districts..... 1-8

Table 2–1 Brochures 2-7

Table 2–2 2022 Outfalls Screened by Watershed..... 2-15

Table 2–3 Complaint Types by Permit Year..... 2-17

Table 2–4 Reporting Mechanism by Permit Year..... 2-17

Table 2–5 Municipal Facility Inventory 2-26

Table 2–6 PHF Storage Facilities..... 2-32

Table 5–1 Fiscal Analysis..... 5-1

List of Figures

Figure 1.1 Average Rainfall and Temperatures 1-4

Figure 1.2 City of Prattville MS4..... 1-5

Figure 1.3 Historical Population..... 1-6

Figure 1.4 Land Use Summary..... 1-7

Figure 2.1 City Social Media Pages 2-4

Figure 2.2 Social Media Followers 2-5

Figure 2.3 Autauga Creek Blueway Trail..... 2-9

Figure 2.4 Recycling Locations 2-11

Figure 2.5 Pet Waste Disposal Station..... 2-11

Figure 2.6 Outfall Inventory and Screening Schedule..... 2-14

Figure 2.7 Mobile Application Screen Shots 2-15

Figure 2.8 Post-Construction BMP Inventory 2-25

Figure 2.9 Municipal Facilities 2-27

Figure 2.10 Street Sweeper Debris – Permit Year Comparison 2-30

Figure 2.11 Litter and Debris Removal– Permit Year Comparison 2-30

Appendices

Appendix A Public Education and Public Involvement

- Brochures
- Post-Construction Workshop Sign-in Sheet
- Annual MS4 Training Sign-in Sheet
- City Fest Sign-up Sheet
- Library Summer Kickoff Handout
- Autauga Creek Improvement Committee Brochures
- Recycling Locations and 2022 Summary
- STEAM Camp Facebook Post

Appendix B Illicit Discharge

- SOP IDDE-01 Outfall Reconnaissance Inventory (ORI)
- SOP IDDE-02 Non-Stormwater Discharge Investigations
- 2022 Outfall ORI Forms
- 2022 Illicit Discharge Complaint Investigations



Appendices (cont.)

	<ul style="list-style-type: none">• Enforcement Actions• IDDE Training Presentation and Sign-in Sheet
Appendix C	Construction Site Runoff <ul style="list-style-type: none">• Grading Permit Packet• 2021-2022 Permits Issued• QCI Certificates• Citizen Serve Site Inspection Example• Citizen Serve Site Inspection Summary• Enforcement Actions
Appendix D	Post-Construction Storm Water Management <ul style="list-style-type: none">• Post Construction Storm Water Management Permit Packet• Waiver Reviews• Design Form Reviews• As-Built Certification Form Reviews• Operation and Maintenance Agreements• BMP Annual Inspections• HOA Escrow Account Agreements and Operation and Maintenance Agreements• Enforcement Actions• Workshop Information
Appendix E	Pollution Prevention and Good Housekeeping <ul style="list-style-type: none">• Municipal Facility Inspections• MS4 Training Presentation and Sign In Sheets• Street Sweeper Collection Log• Urban Management Debris Removal Summary• Commercial Pesticide Applicators License
Appendix F	Fiscal Analysis <ul style="list-style-type: none">• FY22 Budget• FY23 Proposed Budget



SECTION 1

General Information



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.
Name

Mayor
Title

Bill Gillespie, Jr.
Signature

1-12-2023
Date

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



1.2. List of Contacts

Part IV.3.a. 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.

Table 1–1 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) 2022 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 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 storm water program in Alabama. On 9 May 2022, ADEM issued MS4 Phase II Individual Permit (NPDES Number ALS000010) for storm water discharges associated with the City of Prattville’s (City) MS4. The City’s NPDES Permit became effective on 9 May 2022 and will expire on 8 May 2027. A copy of the NPDES Permit is included in the SWMP Plan.

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 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 2021 through 30 September 2022 to comply with the NPDES Permit and the above listed five (5) program elements to the maximum extent practicable (MEP).

1.4. MS4 Area

The City of Prattville is in the central part of the state along the Alabama River in Autauga and Elmore Counties. The City occupies approximately 35.88 square miles and is bordered on the east by the City of Millbrook. Approximately 17.81 square miles (49.6%) 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.

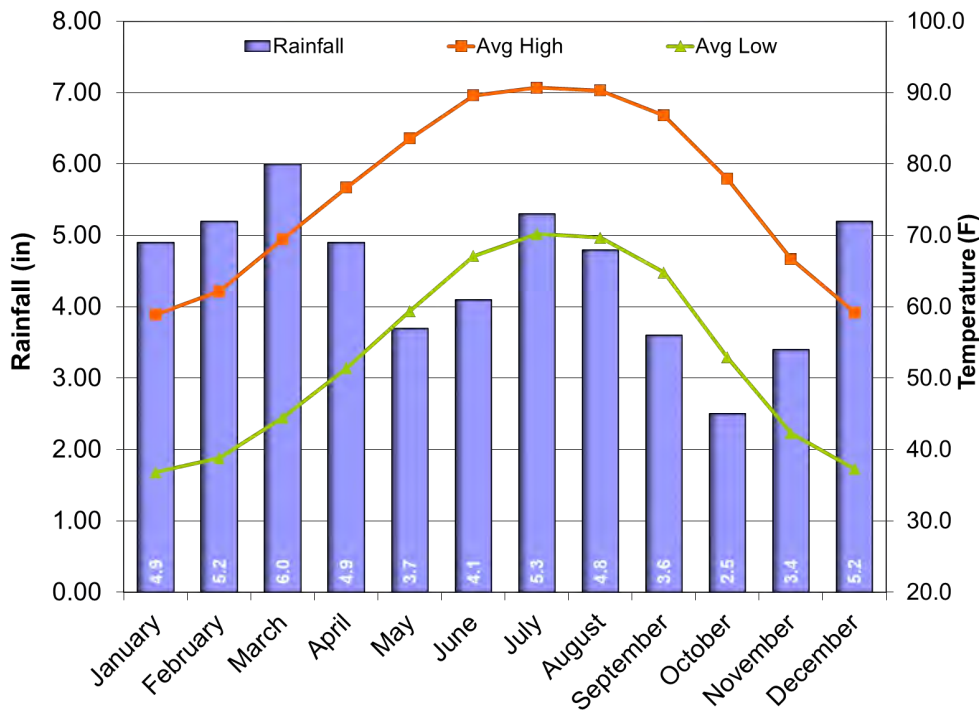


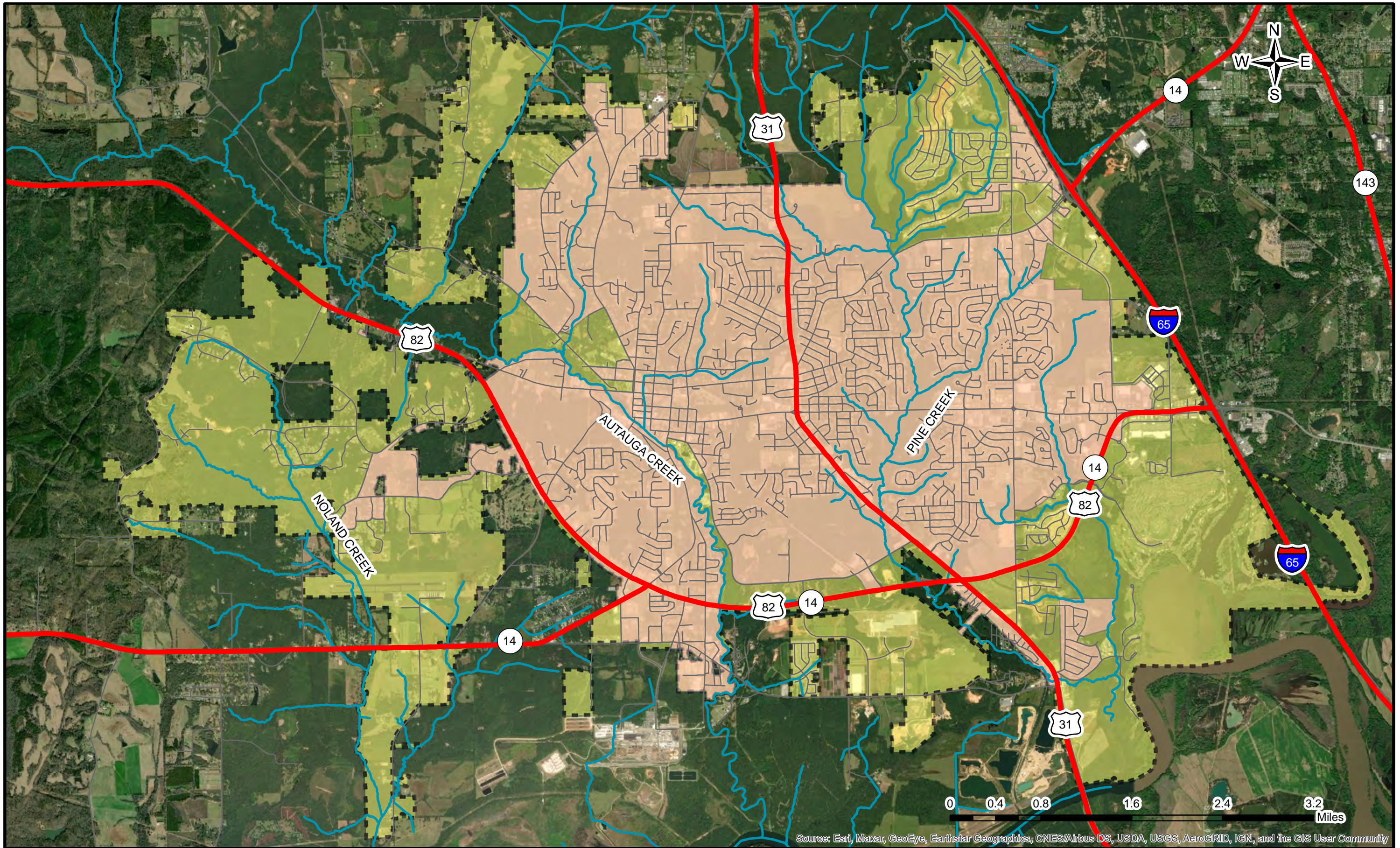
The City’s corporate limits, MS4 Area, Autauga and Elmore City boundaries, major roads, major streams, and surrounding communities are presented in Figure 1.2.

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, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community



 Prattville City Limits	 Streets	 Streams
 Prattville MS4 Area	 ALDOT Roads	



CITY OF PRATTVILLE
City of Prattville MS4

Figure 1.2
September 2022

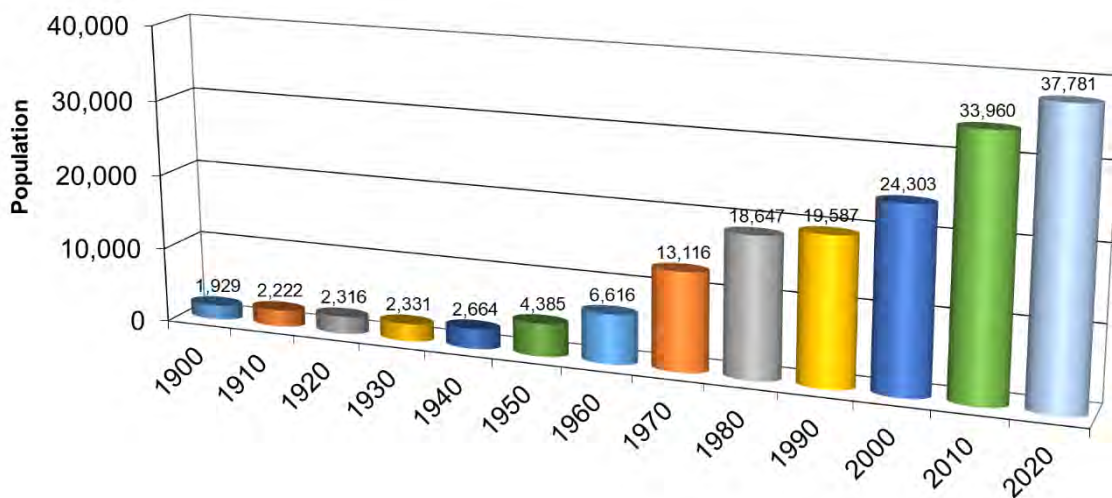


1.4.2. Population

Since becoming incorporated in 1839, the City experienced a small increase in population until 1960. From 1960 to 2020, the City has experienced a significant population growth. Figure 1.3 provides a graph showing the historical population of the City since 1900.

The 2020 Census estimated the total population of the City to be 37,781, indicating a population increase of 3,821 (approximately 10.1%) over the past 10 years.

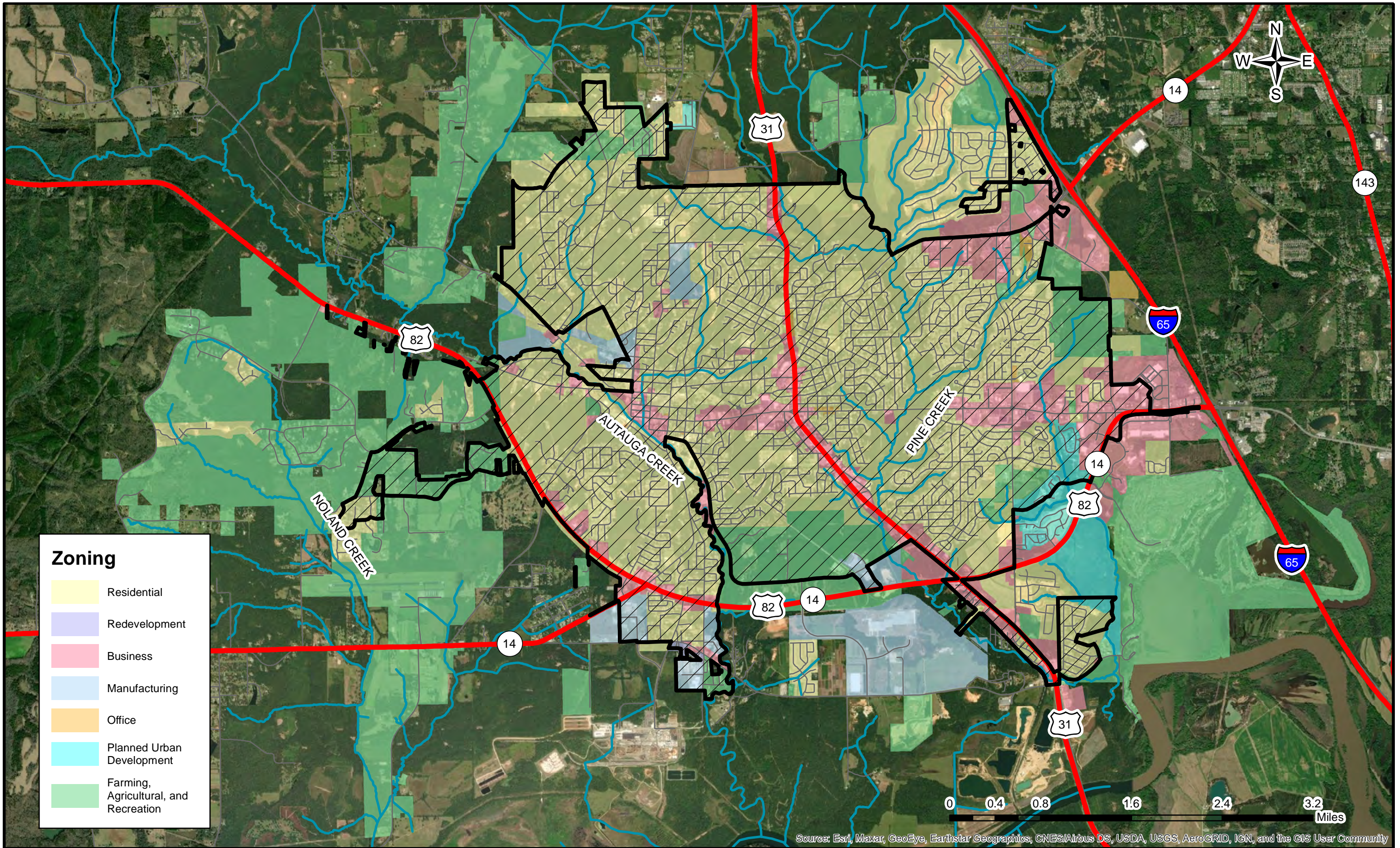
Figure 1.3 Historical Population



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 1–2 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, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community



Prattville MS4 Area — Streets
 ALDOT Roads Streams



CITY OF PRATTVILLE
Land Use Summary

Figure 1.4
September 2022



Table 1–2 Zoning Districts

District	City		MS4 Area	
	Area (mi ²)	Area (%)	Area (mi ²)	Area (%)
Residential	15.953	44.5	12.984	72.9
Redevelopment	0.028	0.1	0.022	0.1
Business	3.707	10.3	2.263	12.7
Manufacturing	1.697	4.7	0.410	2.3
Office	0.113	0.3	0.062	0.4
Planned Unit Development	0.817	2.3	0.204	1.1
Agriculture	13.561	37.8	1.864	10.5
Total	35.876	100.0	17.810	100.0

1.5. Known Problems

According to ADEM's 2022 303(d) list, there are no streams within the City that have been designated as impaired. There are no streams with EPA approved Total Maximum Daily Loads (TMDLs) located within the City.



SECTION 2

Program Evaluation



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.ataugacreek.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 internet provides a very accessible mechanism for making information and data available to City residents. The City has maintained a website (<http://www.prattvilleal.gov/>) that provides information about the City, including 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. Information from the website can be obtained from the above link.

2.2.3. Social Media

The City is active on several social media platforms and can 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.

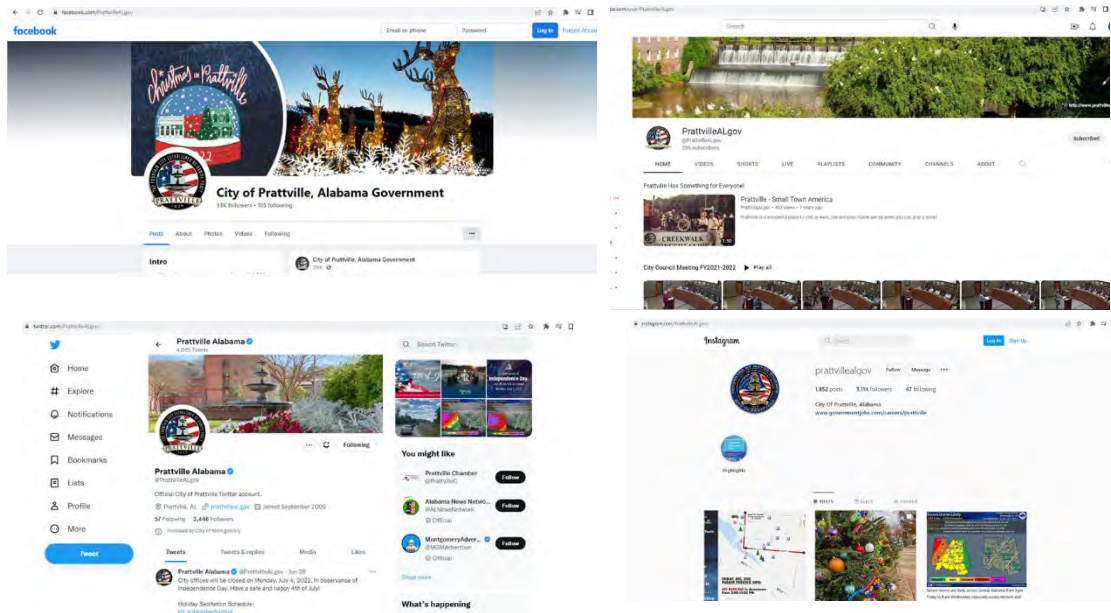


Social media accounts setup by the City for the primary purpose of communicating with the public include the following:

Facebook
Twitter
YouTube
Instagram

www.facebook.com/PrattvilleALgov
www.twitter.com/PrattvilleALgov
www.youtube.com/PrattvilleALgov
www.instagram.com/PrattvilleALgov

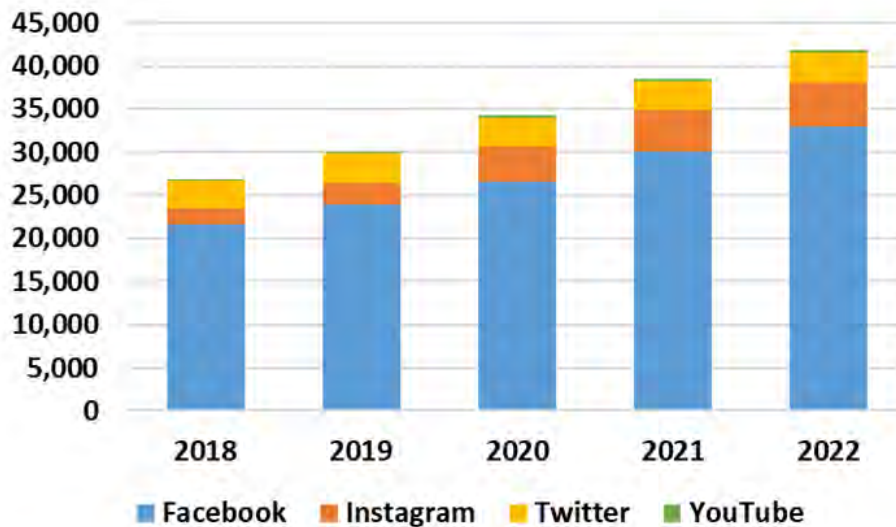
Figure 2.1 City Social Media Pages



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) 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-iMG_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 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 – The City published a video describing the four (4) 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 always reach an audience 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.



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

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).



2.2.1. Training

On 23 August 2022, the City's Storm Water Coordinator gave a presentation to 72 City employees from the Public Works and Parks and Recreation Departments about different components of the City's MS4 program. The presentation was titled "Preventing Storm Water Pollution – What We Can Do" and included information about identifying illicit discharges, reporting illicit discharges, and pollution prevention and good housekeeping. A copy of the presentation and employee training sign-in sheet is provided in Appendix E.

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. Citizen Reporting Tools

The City has implemented various citizen reporting tools and hotlines for the public to provide suggestions and/or report incidents that may potentially impact the MS4. A citizen can report an issue of concern by using one of the following:

Hotline: (334) 595-0481

Citizen Request Portal:

<https://citizenportal.dudesolutions.com/CityOfPrattville/home>

The City has developed and implemented a Citizen Request Portal which may be accessed through the City's website or through a mobile application. This feature allows citizens to report problems at specific locations. The City then distributes the request to the appropriate department.

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 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. 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 school, private school, 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 ongoing Covid-19 pandemic, the Autauga County Water Festival was canceled as a precautionary measure.



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 11,723 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 553.76 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 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).

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 all regulated outfalls within a five (5) year period. During permit year 2021, the City completed its efforts to map and screen all regulated outfalls located within the City's MS4 area

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. Citizen Reporting Tools

The City has implemented various citizen reporting tools and hotlines for the public to provide suggestions and/or report incidents that may potentially impact the MS4. A citizen can report an issue of concern by using one of the following:

Hotline: (334) 595-0481

Citizen Request Portal:

<https://citizenportal.dudesolutions.com/CityOfPrattville/home>

The City has developed and implemented a Citizen Request Portal which may be accessed through the City's website or through a mobile application. This feature allows citizens to report problems at specific locations. The City then distributes the request to the appropriate department.



2.4.1. Outfall Inventory

During permit year 2021, the City completed its efforts to map and screen all regulated outfalls located within the City's MS4 area. Figure 2.6 shows the City's regulated outfall screening schedule for the next five-year period.

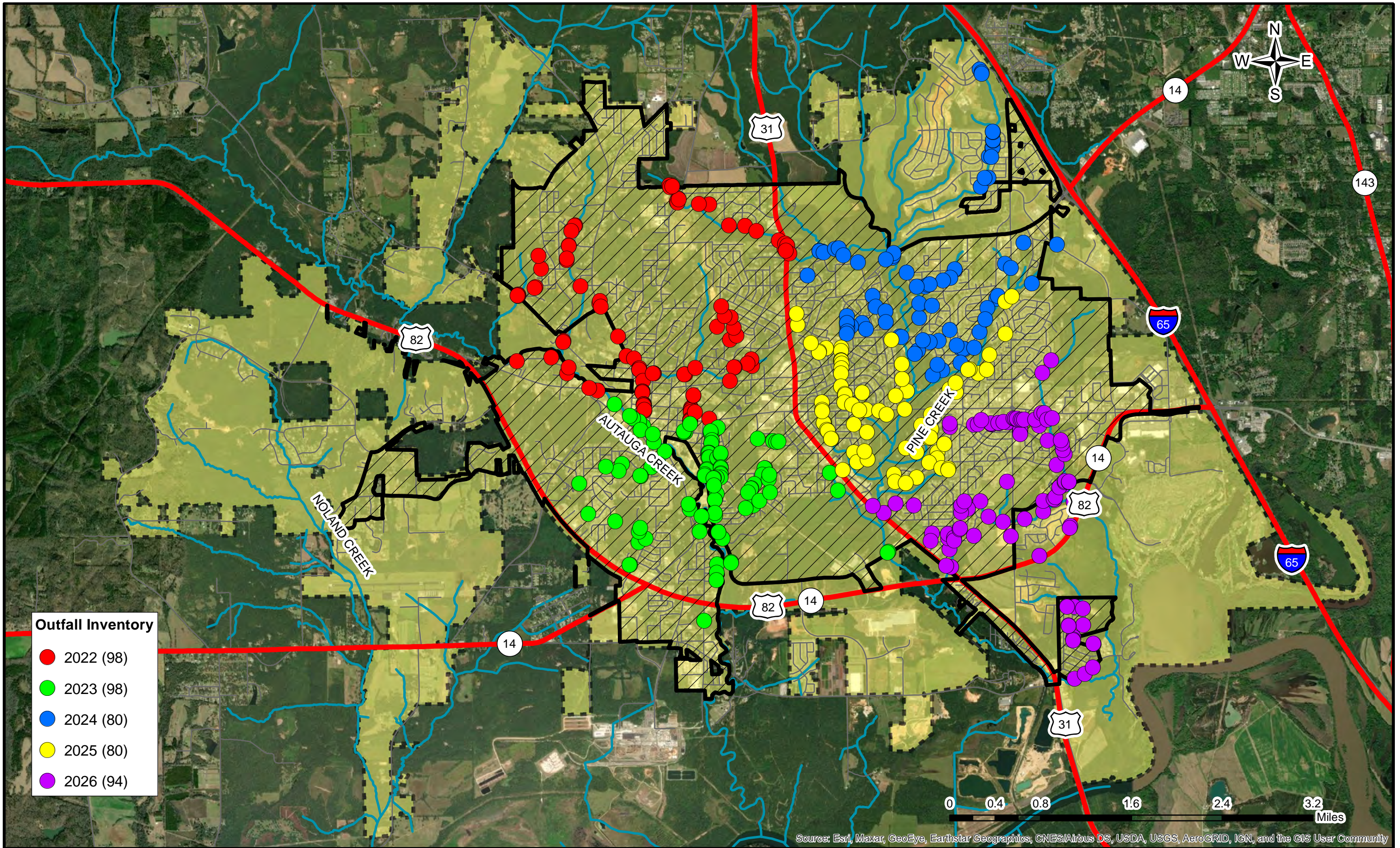
During this permit year, 98 outfalls have been located and evaluated for the presence of non-stormwater discharges. The City screened all regulated outfalls designated for permit year 2022. There were no illicit discharges identified during the inspections.

The City utilizes best available technology for completing an Outfall Reconnaissance Inventory (ORI) to map and screen stormwater outfalls. A mobile application was used to convert the ORI form into an electronic format.

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;
- Ability to automatically create an outfall screening report; and,
- Data collected is easily converted to a format for ArcGIS.

Data collected during the ORI is maintained in the City's GIS dataset for stormwater outfalls. Screen shots of the mobile application are provided in Figure 2.7. A summary of the outfalls screened from 1 October 2021 through 30 September 2022 is provided in Table 2–2 and shown in Figure 2.6. Copies of the outfall mapping forms are provided in Appendix B.



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

- Outfall Inventory**
- 2022 (98)
 - 2023 (98)
 - 2024 (80)
 - 2025 (80)
 - 2026 (94)

 MS4 Area
  ALDOT Roads
  Streams
 Prattville City Limits
  Streets



CITY OF PRATTVILLE
 Outfall Screening Schedule and Inventory

Figure 2.6
 September 2022



Figure 2.7 Mobile Application Screen Shots

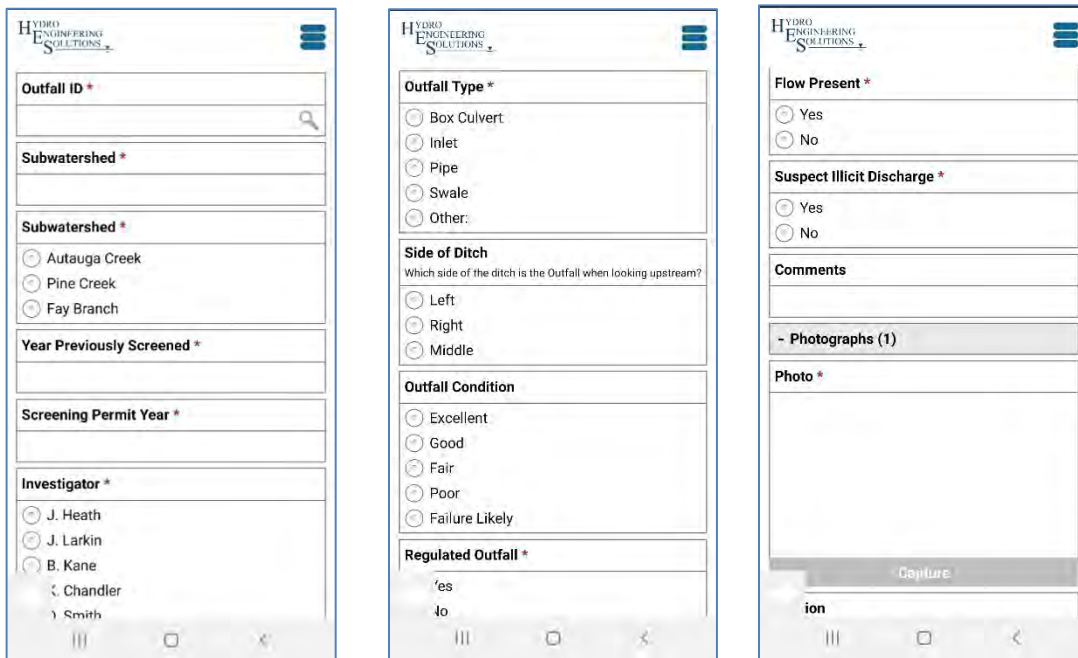


Table 2–2 2022 Outfalls Screened by Watershed

Watershed	Total	2022	2023	2024	2025	2026
Autauga Creek	79	79				
Pine Creek	19	19				
Fay Branch						
Totals	98	98				

2.4.1. Priority Areas

Based on the outfall screening activities and the City knowledge of existing infrastructure, land use, and previously observed illicit discharges, the City has determined that there are not any priority areas that warrant more frequent screening.



2.4.2. Training

On 2 August 2022, Hydro Engineering Solutions gave a presentation to the City's Storm Water Coordinator and a technician tasked with outfall screening. The presentation included information about outfall screening, identifying and eliminating illicit discharges, sampling and testing, and a demonstration of the new mobile application developed for the City. A copy of the presentation and sign-in sheet is provided in Appendix B.

On 23 August 2022, the City's Storm Water Coordinator gave a presentation to 72 City employees from the Public Works and Parks and Recreation Departments about different components of the City's MS4 program. The presentation was titled "Preventing Storm Water Pollution – What We Can Do" and included information about identifying illicit discharges, reporting illicit discharges, and pollution prevention and good housekeeping. A copy of the presentation and employee training sign-in sheet is provided in Appendix E.

The City's Storm Water Coordinator is experienced in non-storm water discharge location, investigation, illicit discharge determination and abatement. The Storm Water Coordinator oversees 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 two (2) 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.

- 556 Selma Highway – A resident observed a broken sewer lateral discharging raw sewage near their driveway. Upon inspection, the Storm Water Coordinator notified the Water Works Department to disconnect the resident's water if the issue was not resolved.
- 453 Selma Highway – The City received a call about a car accident with an automotive fluids spill. The Public Works Department immediately sent a vacuum truck to clean up the spill and dispose of it properly.

All 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 five (5) 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 are effective. Residents may use various methods to alert the City of potential non-stormwater discharges.

Table 2–3 Complaint Types by Permit Year

Complaint Type	2018	2019	2020	2021	2022	Total
Sanitary Sewer	4	5			1	10
Illegal Dumping/Trash	1	1	1			3
Oil/Household Hazardous Waste	2		1	2	1	6
Construction Site Runoff				1		1
Restaurant/Grease	1	1	1			3
Wash Water	1		1	1		3
Ditch Erosion	1		1			2
Other/No Discharge	1					1
Totals	11	7	5	4	2	29

Table 2–4 Reporting Mechanism by Permit Year

Reporting Mechanism	2018	2019	2020	2021	2022	Total
Phone Call	3	5	1	1	2	12
Contact Mayor	1	1				2
City Employee	4	1	3	1		9
Social Media	1			1		2
ORI	1					1
ADEM	1		1	1		3
Totals	11	7	5	4	2	29

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.



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 qualifying 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.

The grading permit was updated during the permit year. A copy of the updated grading permit packet is provided in Appendix C.

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:

- Thirty-one (31) General BMP inspections with deficiencies noted and maintenance required;
- Twenty-four (24) failed General BMP Inspections requiring Re-inspection; and,
- Seven (7) Notice of Violation (NOV) Letters.

A copy of the inspection and enforcement action summary 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 Post Construction Stormwater Management Technical Memorandum. The Technical Memorandum describes how post-construction storm water management requirements for qualifying new development or redevelopment shall be implemented. 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 1.1 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 hydrodynamic separators. 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.

In August 2022, the City updated the Technical Memorandum to incorporated additional design standards, modify inspection certification requirements, and to incorporate new smart forms for design, as-built, and inspection submittals. The smart forms were created in excel with features that assist a designer in providing the information required by the City. A copy of the Technical Memorandum is provided in Appendix F of the SWMP Plan.



2.6.3. Waiver Request

The City recognizes that certain developments may qualify for a waiver from post-construction stormwater management requirements: Developments that meet one of the following criteria may request a waiver:

- A development that has been constructed or obtained an approved permit prior to 5 October 2018;
- A development that is part of a larger existing development that has been approved prior to 5 October 2018 and all stormwater management facilities were constructed as part of the larger existing development.
- A development phase that is part of a regional stormwater management strategy previously approved by the City. The regional stormwater management facility shall be constructed and the as-built certification approved by the City. The proposed phase of the development shall have the same or similar density and drainage area that was used to develop the regional stormwater management strategy.
- A redevelopment that reduces the existing impervious area within the redevelopment.
- A development or redevelopment project that is less than 1-acre, is not part of a larger development, and does not adversely impact the City's MS4.

Copies of the Waiver Request Forms are provided in Appendix F of the SWMP Plan. The City reviewed three (3) waiver requests during the permit year.

2.6.4. Water Quality Requirements

Post-construction stormwater runoff quality is an important component of the City's SWMP. For all qualifying new development or redevelopment, post-construction stormwater management shall include water quality BMPs to detain and treat the first 1.1 inches of rainfall that occurs on the project site.

2.6.5. Low Impact Development

The City encourages 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*. To encourage developers to utilize LID/GI, the City will waive post-construction permitting fees.



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.

During the permit year, the design for 22 development projects were reviewed. Copies of the Design Forms that were reviewed 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 function in accordance with their original design and intent. To confirm that the constructed BMPs meet the designer's intent, As-Built Certification Forms have been developed for various types of BMPs that include detention ponds, retention ponds, underground detention, bioretention areas, and hydrodynamic separators. Copies of the as-built certification forms are provided in Appendix F of the SWMP Plan.

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 Certification Form.

During the permit year, six (6) 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 that were reviewed are provided in Appendix D.

2.6.8. Operation and Maintenance Agreement

It is the responsibility of the Owner to operate and maintain the stormwater 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 the issuance of a Certificate of Occupancy or 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 F of the SWMP Plan. The City received five (5) OMAs during the permit year.

2.6.9. Annual Inspection

For post-construction BMPs to continue to function in accordance with their original design and installation, annual inspections are required. 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 provides documentation concerning the condition of each post-construction stormwater management, and any maintenance required and/or performed. The City shall evaluate the documentation submitted to confirm that the stormwater management facilities are continuing to function as designed.

Annual inspection forms have been developed for various types of BMPs that include detention ponds, retention ponds, underground detention, bioretention areas, and hydrodynamic separators. Copies of the annual inspection forms are provided in Appendix F of the SWMP Plan.

The City received eleven (11) Annual Inspection Forms during the permit year. Copies of the annual inspection forms received this permit year are provided in Appendix D.

2.6.10. Maintenance Escrow Agreement

For residential subdivisions with Homeowner's Associations (HOAs), the City's Post Construction Stormwater 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 shall be established to, at minimum, cover 50% of the constructed cost of each post construction stormwater management BMP. The developer or HOA shall initially



pay 10% of this amount. The developer or HOA shall annual contribute 10% of the remaining amount required until the escrow account balance is equal to 50% of the constructed cost of each BMP.

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 included with the Technical Memorandum. The City shall review and approve any escrow account disbursement requests listed on the form prior to the HOA withdrawing money for BMP maintenance.

A copy of the Escrow Account Agreement and Escrow Account / Maintenance Request Form is provided in Appendix F of the SWMP Plan. The City received two (2) Escrow Account / Maintenance Request Forms during the permit year.

2.6.11. Post-Construction BMP Inventory

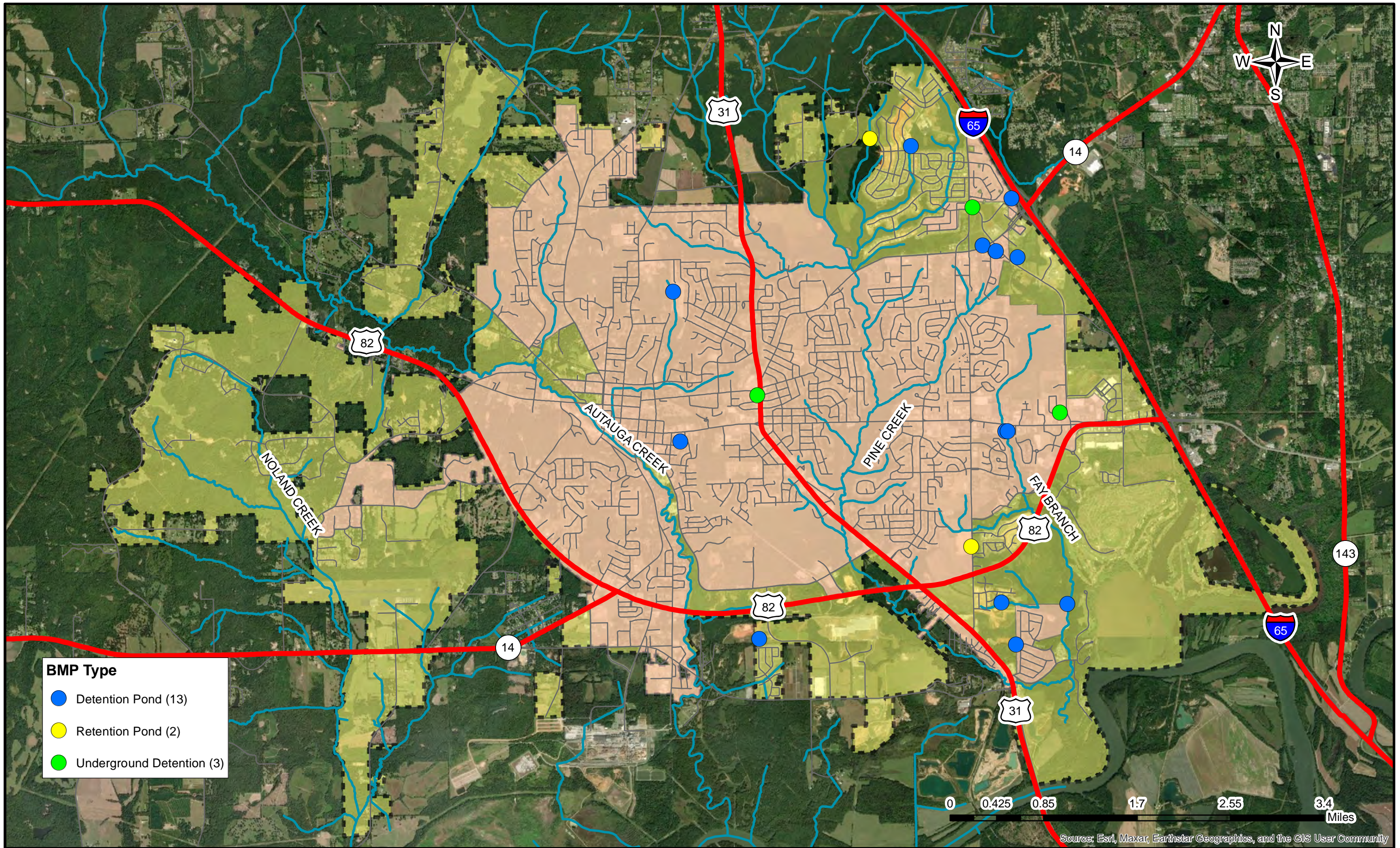
Upon approval of the as-built certification, the post-construction BMPs are incorporated into the City's inventory. An inventory of post-construction BMPs is provided in Figure 2.8.

2.6.1. Workshop

On 13 September 2022, the Cities of Montgomery and Prattville hosted a joint post-construction workshop to educate local designers about updates to each city's Post-Construction Storm Water Management Program. The Cities reviewed the updated waiver, design, as-built certification, and annual inspection forms and discussed common issues encountered on project submittals. Twenty-five (25) attendees were present. A copy of the presentation materials and sign-in sheet are provided in Appendix D.

2.7. Pollution Prevention and Good Housekeeping

The pollution prevention / good housekeeping program is a key element to help the MS4 to reduce potential pollutants from entering storm water runoff from City facilities located within the MS4 area. 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.



BMP Type

- Detention Pond (13)
- Retention Pond (2)
- Underground Detention (3)

Prattville City Limits
 — ALDOT Roads
 — Streams
 — Streets

Prattville MS4 Area



CITY OF PRATTVILLE
Post Construction BMP Inventory

Figure 2.8
September 2022

Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community



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.

2.7.1.1. Facility Inventory

The City has identified 22 municipal facilities located within the City's MS4 area. Municipal facilities have been categorized as either administrative, cemetery, operational, park, public safety, or recreational. A summary of the number of municipal facilities by category is provided in Table 2-5. The location of City Facilities are shown in Figure 2.9. An inventory is provided in Appendix G.

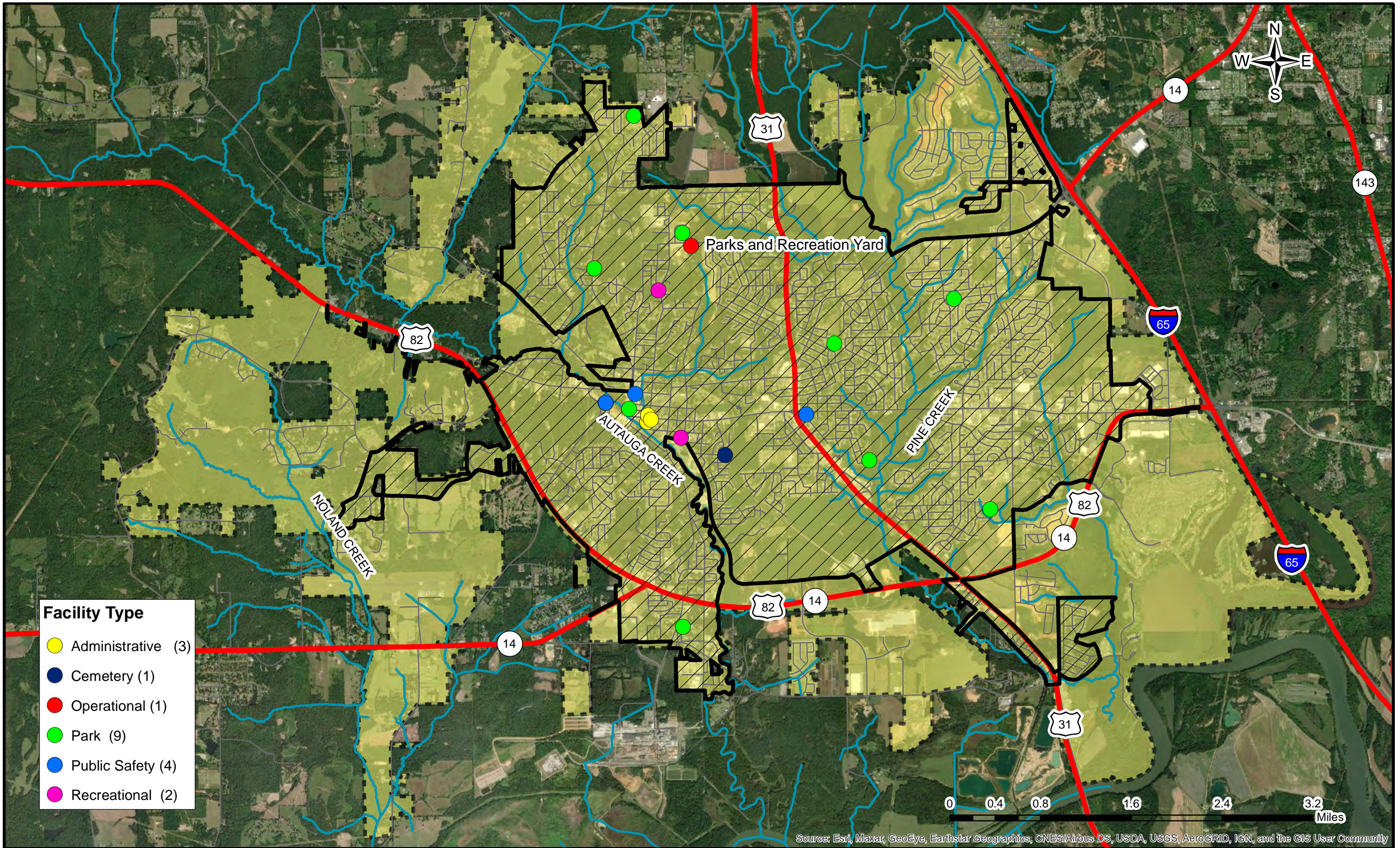
Table 2-5 Municipal Facility Inventory

Facility Category	Division
Administrative	3
Cemetery	1
Operational	1
Park	10
Public Safety	5
Recreational	2

The City has determined that municipal facilities categorized as administrative, cemetery, park, public safety, or recreational are routinely maintained, do not store significant materials that may adversely impact stormwater runoff, and do not have a significant impact to stormwater quality.

2.7.1.2. Facility Inspections

The City has identified one facility, Parks and Recreation Yard, that is located within the MS4 area where operational activities occur to support City services and has a potential to discharge pollutants in stormwater runoff. The maintenance and upkeep of this facility is performed on a routine basis. The City has developed a good housekeeping checklist that is used as part of the annual inspection. This facility is inspected at a minimum of annually.



- Facility Type**
- Administrative (3)
 - Cemetery (1)
 - Operational (1)
 - Park (9)
 - Public Safety (4)
 - Recreational (2)

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



CITY OF PRATTVILLE
Municipal Facility Inventory

Figure 2.9
September 2022

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



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 the following:

- Pesticides, Herbicides, and Fertilizers usage;
- Rain day schedules and activities for Urban Management crews;
- Emergency procedures for Spills and Leaks at Fire Stations 1 and 3 and Street Division Yard.
- SOP #25 – Pollution Prevention and Good House Keeping: Events; and,
- SOP #26 – Pollution Prevention and Good House Keeping: Municipal Facilities.

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. Training

On 23 August 2022, the City's Storm Water Coordinator gave a presentation to 72 City employees from the Public Works and Parks and Recreation Departments about different components of the City's MS4 program. The presentation was titled "Preventing Storm Water Pollution – What We Can Do" and included information about identifying illicit discharges, reporting illicit discharges, and pollution prevention and good housekeeping. A copy of the presentation and employee training sign-in sheet is provided in Appendix E.

2.7.2. Litter Program

The NPDES permit requires the City to develop and implement a litter program for the prevention and removal of trash from the City's MS4. The City has initiated the implementation of BMPs that provide a means of reducing the accumulation of litter in public areas and road rights-of-way. A description of the BMPs being implemented by the City's MS4 is described in the following sections.

2.7.2.1. Events

From time to time, the City may host various parades, festivals, sporting events, etc. As part of the event, the City implements preventive measures that may include trash receptacles and routine trash collection. Typically, within one business day of the event concluding, trash is collected by Urban Management,



Sanitation and/or street sweepers and integrated into the trash collected by Sanitation. As a result, the City does not have a mechanism to quantify the amount of trash collected for a specific event.

The City has developed SOP #25 – Pollution Prevention and Good Housekeeping: Events. A copy of the SOP is provided in Appendix G of the SWMP Plan.

2.7.2.2. Street Sweeping

The Public Works Department has two (2) street sweepers dedicated for street sweeping. Curbed streets are swept at a frequency to allow the entire City to be swept monthly. 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 1,312 cubic yards of material. A graph showing a comparison of street sweeper material collected is shown in Figure 2.10.

2.7.2.3. 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. During the permit year, the City collected and disposed of approximately 1,843 bags of litter and 263 loads of debris. Graphs showing comparison by permit year of litter collected and debris removed is shown in Figure 2.11.



Figure 2.10 Street Sweeper Debris – Permit Year Comparison

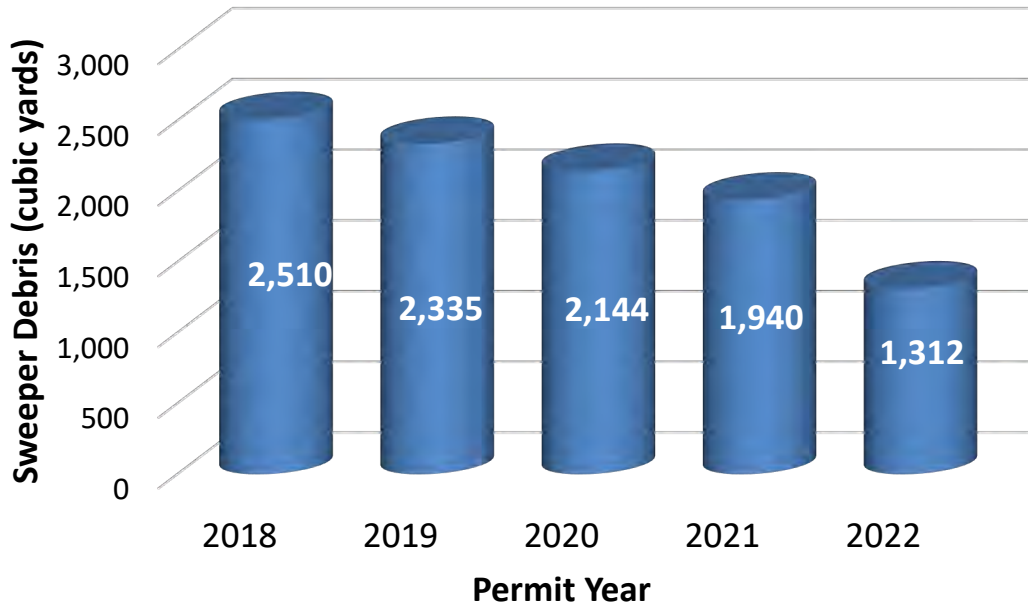
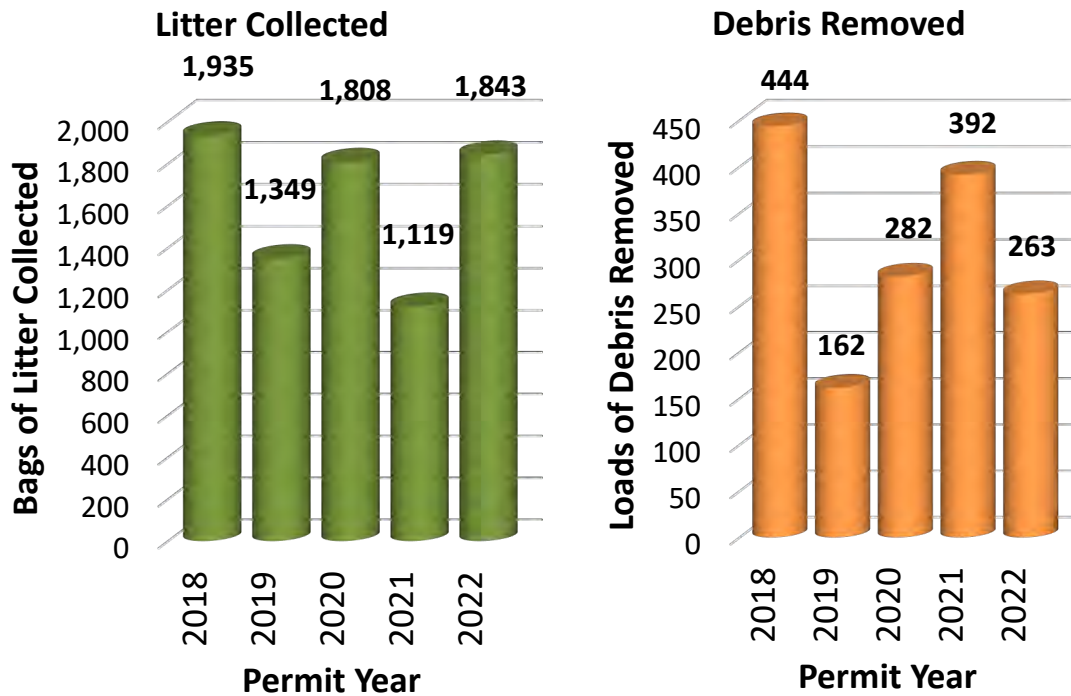


Figure 2.11 Litter and Debris Removal– Permit Year Comparison





2.7.2.4. 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.

2.7.2.5. Trash Receptacles

The City maintains trash receptacles in areas owned, operated, and/or maintained by the City that may include but are not limited to:

- Parks;
- Recreational facilities;
- Municipal facilities/yards.

Trash collected from City parks and municipal facilities is integrated into the trash routinely collected by Sanitation. As a result, the City does not have a mechanism to quantify the amount of trash collected from a specific City park or municipal facility.

The City has developed SOP #26 – Pollution Prevention and Good Housekeeping: Municipal Facilities. A copy of the SOP is provided in Appendix G of the SWMP Plan.

2.7.2.6. Enforcement

Chapter 46 – Nuisances, Article III. – Litter of the City's Code of Ordinances provides the City with the legal authority to enforce litter prevention measures. Any person violating any provisions of this article shall be deemed guilty of a misdemeanor and shall, upon conviction, be punished on a first offense a minimum fine of \$200 and shall serve community service to pick up litter on public rights-of-way. Any subsequent conviction shall be \$500 and community service.

A copy of the ordinance is provided in Appendix G of the SWMP Plan and available through the City's website.

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 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.

2.7.3.2. 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 located within the City’s MS4 area are summarized in Table 2–6.

Table 2–6 PHF Storage Facilities

Facility	Address
Parks and Recreation Yard	161 Ridgewood Road

The Parks and Recreation Yard is inspected on an annual basis.

2.7.3.3. 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.

2.8. 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, 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 proactively continues to develop, manage, and implement a SWMP. City staff are actively involved in the development, management, and daily implementation of BMPs that 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 have 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 implementing a SWMP, the City faces many challenges as the SWMP continues to evolve. Program weaknesses include the following:

- **Regulatory Requirements** – During the NPDES permit renewal process, ADEM incorporated new permit requirements not supported by the federal regulations or state law. To address these new requirements, the City is required to dedicate additional funding and resources.
- **Program Implementation** – The SWMP 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 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 is an ongoing process. Although gradual improvement in compliance may occur over time, there still may 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 98 outfalls during the permit year, the City has not identified a 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 Storm Water 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 routinely reported 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



3. Summary Tables

The purpose of the table is to document in a concise form the program activities and the 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 2 activities / year)	Local Partnerships Track	Yes	1 ACES member assists with ESC inspections
	Web Site Update as needed	Yes	Website has been updated
	SWMP Plan and Annual Report posted to Website	Yes	Documents posted to website
	Social Media Track	Yes	Facebook 33,000 Followers Twitter 3,442 Followers Youtube Channel 353 Subscribers Instagram 5,098 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
	Workshops	Yes	Post-Construction Workshop 25 Attendees
	Training Track	Yes	Annual MS4 Training 87 City staff



Program Component	SWMP Activity Schedule		
	Required	Complied	Accomplished
Public Involvement (Minimum of 2 activities / year) continued	Public Input for SWMP Plan	Yes	SWMP Plan is available on City's website and Public Input is available
	Citizen Reporting Tool Track	Yes	Available on City's website
	Pet Waste Disposal Stations Track	Yes	7 Stations maintained ~3,000 bags purchased annually
	Recycling Track	Yes	City Cardboard Recycling 553.76 tons Single-stream Recycling 11,723 tons
	Public Events Track	Yes	City Fest 500 handouts 20 employees 2 street sweeping events Library Summer Kickoff 400 handouts Touch-a-Truck Education trailer STEAM Camp 40 students Education trailer

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.



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	Inspection Form updated to Mobile Application
	Outfall Map Annually	Yes	Map has been updated
	Outfall Mapping and Screening Each Outfall 1 / 5 yr	Yes	98 Outfalls
Illicit Discharges	Citizen Reporting Tools Update as needed	Yes	Available on City's website
	Inspection Form Update as needed	Yes	Inspection Form updated to Mobile Application
	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	IDDE Refresher Training 2 City Staff Annual MS4 Training 87 City Staff
	Complaints Track	Yes	2 Complaints



Program Component	SWMP Activity Schedule		
	Required	Complied	Accomplished
Illicit Discharges (cont.)	Illicit discharge investigations Track	Yes	2 illicit discharge complaint investigations 0 Non-stormwater discharge investigation from outfall screening
	Illicit discharges abated Track	Yes	2 illicit discharges abated

Comments:

1. Information and data 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	251 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	525 General BMP 109 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 31 Deficiencies Noted and Maintenance Required 0 Written Warning 7 NOV Letters 0 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	Post-Construction Permit Application Packet updated
	Permits issued Track	Yes	259 Stormwater permits
Plan Review	Post-Construction Storm Water Management Requirements Update as needed	Yes	Design Form updated
	Plan Review Checklist and Procedures Update as needed	Yes	No update or revision required
	Plans Reviewed Track	Yes	22 Projects reviewed 3 Waivers reviewed
Post-Construction BMPs	As Built Certification Requirements Update as needed	Yes	As-built Certification Form updated
	BMP Inventory Track	Yes	5 BMPs
	As Built Certification Forms Track	Yes	6 As Built Certification Forms reviewed
Maintenance	Maintenance Requirements Update as needed	Yes	Annual Inspection Form updated



Program Component	SWMP Activity Schedule		
	Required	Complied	Accomplished
Maintenance (cont.)	Operations and Maintenance Agreements (OMA) Track	Yes	5 OMAs
	Annual Inspections Track	Yes	11 BMPs Inspected
	Escrow Account Agreements Track	Yes	2 Agreements

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	1 Facility within MS4
	Inspection Requirements Update as Needed	Yes	No update or revision required
	Inspections Track	Yes	1 Facility 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	Annual MS4 Training 87 City staff
Roads	Ditch Debris Removal Track	Yes	263 loads of debris removed
	Litter Control Track	Yes	1,843 bags of litter
	Street Sweeping Track	Yes	1,1312 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	1 Facility within MS4
	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

Comments:

1. Supporting documentation is provided in Appendix E.



SECTION 4

Summary of Proposed
Program Changes



4. Summary of Proposed Program Changes

4.1. SWMP Review and Update

The United States Census Bureau is in the process of developing updated urbanized area maps using the 2020 census data. It is anticipated that the new urbanized area data will be available in late 2022 or early 2023.

In accordance with Part II.D.3. of the NPDES Permit, the City is required to implement the SWMP Plan on all new areas of the City's MS4 as soon as practicable, but no later than one (1) year from the addition of new areas. Upon release of the 2020 urbanized areas, the City shall update the SWMP Plan to incorporate any new MS4 areas and develop a schedule to implement applicable program elements within the new MS4 areas.

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 2022 is from 1 October 2021 through 30 September 2022. Many City Departments contribute to the City's SWMP. Since the City's budgeting process does not provide 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	2022	2023
Fire	\$ 8,924,443	\$ 9,064,870
Sanitation	\$ 3,633,100	\$ 3,076,841
Wastewater	\$ 9,072,413	\$ 12,057,763
Urban Management	\$ 2,030,415	\$ 2,082,418
Parks & Recreation	\$ 3,067,932	\$ 4,481,149
Engineering	\$ 2,072,698	\$ 2,641,846
Planning	\$ 832,131	\$ 790,037
Public Works	\$ 754,709	\$ 1,012,720
Facilities Maintenance	\$ 1,163,261	\$ 1,419,509
Vehicle Maintenance	\$ 425,456	\$ 388,528
Building	\$ 417,770	\$ 386,634
Total	\$ 32,394,328	\$ 37,402,315

The City's stormwater program is managed by the Public Works Department. For the 2022 Permit Year, the Public Works Department spent \$88,737 for the City's storm water management program. For the 2023 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 2022 and draft budget for 2023 are provided in Appendix F.