



**STORMWATER  
MANAGEMENT**



# **ANNUAL REPORT**

**APRIL 1, 2018 – MARCH 31, 2019**

City of Jacksonville, Alabama  
Phase II Small MS4  
ADEM NPDES Permit ALR040051

May 2019

Prepared By:

The City of Jacksonville  
320 Church Avenue, SE  
Jacksonville, Alabama 36265  
Phone (256) 782-3840  
Fax (256) 435-4103

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## 1. INTRODUCTION

The City of Jacksonville has prepared this Annual Report for the City of Jacksonville Phase II Small Municipal Separate Storm Sewer System (MS4).

The Annual Report is required by Part VI of the Alabama Department of Environmental Management (ADEM) National Pollutant Discharge Elimination System (NPDES) Permit ALR040051 for discharges from regulated small municipal separate storm sewer systems (MS4), issued to the City of Jacksonville by the Alabama Department of Environmental Management (ADEM). The City of Jacksonville is located within the Anniston-Oxford Urbanized Area which also includes the City of Anniston, City of Oxford, and portions of unincorporated Calhoun County.

### 1.1 Permit and Program History

The Stormwater Phase II Final Rule issued by the United States Environmental Protection Agency (USEPA) in 1999 requires nationwide coverage of all operators of small MS4s located within the boundaries of an “urbanized area” as defined by the latest decennial Census. Based on the results of the 2010 census, the Bureau of the Census designated the entities listed in Section 1 as the Anniston, Alabama Urbanized Area. The urbanized area incorporates approximately 87 square miles. A map outlining the approximate boundary of the Anniston-Oxford, Alabama Urbanized Area is included in **Appendix A**.

The urbanized area initially applied for and received an ADEM NPDES General Permit from the ADEM in 2003. The ADEM NPDES General Permit No. ALR040004 was issued to the urbanized area with an effective date of March 10, 2003. The five-year permit expired on March 9, 2008. A Notice of Intent for renewal of the permit was submitted prior to its expiration and permit coverage was extended through re-issuance of the ADEM NPDES General Permit No. ALR040004 with an effective date of February 1, 2011. The permit was modified on February 24, 2012 and expired on January 31, 2016.

From 2003 to 2013, the City of Jacksonville, along with other co-permittees, relied on the Calhoun County Commission to implement the stormwater management program and prepare annual reports for compliance with the ADEM NPDES General Permit No. ALR040004. On October 29, 2013, the ADEM issued a Notice of Violation (NOV) to the City of Jacksonville citing deficiencies in their implementation of the permit requirements. Following receipt of the NOV, the City of Jacksonville chose to prepare and implement a stormwater management program independent of the other co-permittees.

On November 19, 2013, the City of Jacksonville acquired the services of S&ME Inc. to prepare a SWMP that was specifically for the City. The SWMP was submitted to the ADEM and was received on February 27, 2014. The SWMP was prepared in accordance with the ADEM

NPDES General Permit No. ALR040004 which had an effective date of February 1, 2011 and an expiration date of January 31, 2016. S&ME Inc. also assisted the City with the implementation of the SWMP and prepared annual reports for the reporting periods of April 1, 2013 to March 31, 2014 and April 1, 2014 to March 31, 2015.

From April 1, 2015 to present the City of Jacksonville's Planning, Development & Stormwater Director has been responsible for the coordination and implementation of the SWMP and preparation of the annual reports.

On September 14, 2016 the ADEM mailed and emailed the City of Jacksonville a new ADEM NPDES Permit No. ALR040051. This permit has an effective date of October 1, 2016 and an expiration date of September 30, 2021. Due to requirements set-forth in the new ADEM NPDES Permit No, ALR040051, an updated SWMP was due by January 1, 2017. A copy of the coverage authorization letter and ADEM NPDES Permit No. ALR040051 is included in **Appendix C**.

## **1.2 Jacksonville MS4 Area**

The City of Jacksonville Municipal Separate Storm Sewer System (Jacksonville MS4) is defined as the area within the City Limits that also lies within the Anniston-Oxford, AL Urbanized Area boundary, excluding any Jacksonville State University property (NPDES No. ALR040064) that lies within this area. The Jacksonville MS4 (including Jacksonville State University property) comprises approximately 7.3 square miles (4,672 acres) of the Anniston-Oxford, Alabama Urbanized Area. NOTE: Due to ongoing and unknown property transactions by Jacksonville State University, it is impossible for the City to verify all Jacksonville State University property in order to exclude it from the overall Jacksonville MS4 size and boundary. Also, all Alabama Department of Transportation (ALDOT) right-of-way within the Jacksonville MS4 is a separate ALDOT MS4, however it has not been excluded. A map outlining the approximate boundary of the Jacksonville MS4 (which includes Jacksonville State University property) is included in **Appendix A**.

According to the 2010 Census, the City of Jacksonville has a total population of 12,548, approximately 97% of which live within the designated urbanized area boundary.

## **1.3 Hydrologic Units in the MS4 Area**

Tallasseehatchee Creek is the primary receiving water for the Jacksonville MS4. Tallasseehatchee Creek eventually flows into Ohatchee Creek, 0.48 mile from where Ohatchee Creek enters the Coosa River.

Approximately 1.7 square miles of the south portion of the Jacksonville MS4 discharge to Little Tallasseehatchee Creek. The remaining 5.6 square miles discharge to Tallasseehatchee Creek.

**Table 1. Hydrologic Hierarchy**

REGION	03	South Atlantic-Gulf
SUBREGION	0315	Alabama River Basin
BASIN	031501	Coosa-Tallapoosa: Above the confluence of and including the Coosa and Tallapoosa River Basins
SUBBASIN	03150106	Middle Coosa

**Table 2. Watersheds in the MS4 Area**

WATERSHED	HUC
Talasseehatchee Creek	03150106-04

**Table 3. Subwatersheds in the MS4 Area**

SUBWATERSHED	HUC	TOTAL SUBWATERSHED SQ. MILES (ACRES)±	MS4 AREA IN SUBWATERSHED SQ. MILES (ACRES)±
Little Talasseehatchee Creek	03150106-04-01	22.9 (14,656)	1.7 (1,088)
Flat Tire Creek - Talasseehatchee Creek	03150106-04-02	43.3 (27,712)	5.6 (3,584)

## 1.4 Water Quality Concerns

Section 303(d) of the Clean Water Act (CWA), as amended by the Water Quality Act of 1987, and the USEPA Water Quality Planning and Management Regulations (40CFR130) require states to identify waterbodies not in compliance with the water quality standards applicable to their designated use classifications. Section 303(d) then requires that total maximum daily loads (TMDLs) be determined for all pollutants causing violation of applicable water quality standards in each identified segment.

There are no 303(d) listed or TMDL waters located within the City’s MS4 area as per the 2018 Alabama 303(d) list (dated: September 17, 2018).

## 1.5 Responsible Party

The Planning, Development & Stormwater Director is responsible for the coordination and implementation of all components of the Stormwater Management Program. The Mayor is responsible for all signatory requirements for all notices of intent, reports, certifications, or other information submitted to the ADEM.

Mark W. Stephens, BSCE, CPESC  
Planning, Development & Stormwater Director  
320 Church Avenue, SE  
Jacksonville, AL 36265  
Office: (256) 782-3840  
[mstephens@jacksonville-al.org](mailto:mstephens@jacksonville-al.org)

Johnny L. Smith  
Mayor  
320 Church Avenue, SE  
Jacksonville, AL 36265  
Office: (256) 435-7611  
[mayor@jacksonville-al.org](mailto:mayor@jacksonville-al.org)

## 1.6 Annual Review

The Stormwater Management Program will be reviewed by the City's Planning, Development & Stormwater Director as needed during the reporting period and at minimum annually to verify compliance with the current ADEM NPDES Permit No. ALR040051 and to ensure implementation of the SWMP on any new areas added to the MS4 as soon as practical, but not later than one (1) year from addition of the new areas.

## 1.7 Updates to the SWMP

The Stormwater Management Program will be updated as deemed necessary by the City's Planning, Development & Stormwater Director to maintain compliance with the ADEM NPDES Permit No. ALR040051. Any modifications will be submitted to the ADEM at the time a modification is proposed for the ADEM to review and approve. Modifications made to the SWMP may include, but are not limited to, the replacement of ineffective or infeasible BMPs or the addition of components, controls and requirements.

A list of modifications made to the SWMP during this reporting period is included in **Appendix B** (Document Set 21).

## 1.8 SWMP Components

Part III.A of the ADEM NPDES Permit No. ALR040051 requires that the City develop, revise, implement, maintain, and enforce a stormwater management program which shall include controls necessary to reduce the discharge of pollutants from its MS4 consistent with section 402(p)(3)(B) of the Clean Water Act and 40 CFR parts 122.30-122.37. These requirements shall be met by the development and implementation of a Stormwater Management Program (SWMP) which address the best management practices (BMPs), control techniques and systems, design and engineering methods, public participation and education, monitoring, and other appropriate provisions designed to reduce the discharge of pollutants from the MS4 to the maximum extent practicable (MEP).

The City shall provide and maintain adequate finance, staff, equipment, and support capabilities necessary to implement the SWMP and comply with the requirements of the ADEM NPDES Permit No. ALR040051.

Part III.B of the ADEM NPDES Permit No. ALR040051 requires that the SWMP address the following five minimum stormwater control measures:

1. Public Education and Public Involvement on Stormwater Impacts
2. Illicit Discharge Detection and Elimination (IDDE) Program
3. Construction Site Stormwater Run-off Control
4. Post-Construction Stormwater Management in New Development and Redevelopment
5. Pollution Prevention/Good Housekeeping for Municipal Operations

The five minimum stormwater control measures are outlined in the following sections and were implemented by the effective date of the ADEM NPDES Permit No. ALR040051.

## **2. MONITORING, REPORTING, AND RECORDKEEPING**

The ADEM NPDES Permit No. ALR040051 outlines requirements for monitoring and reporting in Part V, annual reporting requirements in Part VI, and retention of records in Part VII. T.

### **2.1 Monitoring**

- A) As per the 2018 Alabama 303(d) list (dated: September 17, 2018), there are no 303(d) listed or TMDL waters located within the City's MS4 boundary. No monitoring is required.
- B) If a waterbody within the MS4 area is listed on a later version of the 303(d) list, or otherwise designated impaired by the ADEM, or which a TMDL is approved or established by the EPA, during the ADEM NPDES Permit No. ALR040051 cycle, then the City must implement a monitoring program within 6 months. This will include revisions to the SWMP in regard to monitoring, collection of samples, analysis, and reporting.

### **2.2 Annual Reporting**

- A) The annual report (1 hardcopy and 1 electronic copy) is due to the ADEM no later than May 31 of each year. The annual report shall cover the previous April 1 to March 31.
- B) On or after December 21, 2020, all annual reports shall be submitted to the ADEM electronically in a prescribed manner acceptable to the ADEM.
- C) The annual report shall be certified and signed in accordance with the ADEM NPDES Permit No. ALR040051 Part VII. G.

- D) In accordance with the ADEM NPDES Permit No. ALR040051 Part VI, the annual report shall include the following at a minimum, in addition to those requirements referenced in Part III-V:
1. A list of contacts and responsible parties (e.g.: agency, name, phone number, address, & email address) who had input to and are responsible for the preparation of the annual report;
  2. Overall evaluation of the Stormwater Management Program developments and progress for the following:
    - a. Major accomplishments;
    - b. Overall program strengths/weaknesses;
    - c. Future direction of the program;
    - d. Overall determination of the effectiveness of the SWMP taking into account water quality/watershed improvements;
    - e. Measureable goals that were not performed and reasons why the goals were not accomplished; and
    - f. If monitoring is required, evaluation of the monitoring data.
  3. Narrative report of all minimum stormwater control measures referenced in Part III.B of this permit. The activities shall be discussed as follows:
    - a. Minimum control measures completed and in progress;
    - b. Assessment of the controls; and
    - c. Discussion of proposed BMP revisions or any identified measureable goals that apply to the minimum stormwater control measures.
  4. Summary table of the stormwater controls that are planned/scheduled for the next reporting cycle;
  5. Results of information collected and analyzed, if any, during the reporting period, including any monitoring data used to assess the success of the program at reducing the discharge of pollutants to the MEP.
  6. Notice of reliance on another entity to satisfy some of your permit obligations; and
  7. If monitoring is required, all monitoring results collected during the previous year in accordance with Part V, if applicable. The monitoring results shall be submitted in a format acceptable to the ADEM.

The Overall Evaluation of the Stormwater Management Program as required in Section 2.2(D)2 is provided in Section 8.

### **2.3 Recordkeeping**

- A) The Stormwater Management Program developed in accordance with ADEM NPDES Permit No. ALR040051 Part III-V shall be retained until at least five years after coverage until the permit terminates.
- B) Samples and measurements taken for the purpose of monitoring (if required) shall be representative of the monitored activity.

- C) Records must be maintained and will be made available for examination. Records will be retained for a minimum period of at least three (3) years from the data of the sample, measurement, report, or application or for the term of the ADEM NPDES Permit No. ALR040051, whichever is longer. This period may be extended at the request of the ADEM Director at any time.

The following is a list of records to be retained:

- Copies of all reports required by the permit
- Copies of monitoring reports, calibration and maintenance records, chart recordings
- Copy of the ADEM NPDES Permit
- Copy of the Notice of Intent

### **3. PUBLIC EDUCATION AND PUBLIC INVOLVEMENT ON STORMWATER IMPACTS**

The following section contains: strategies for the minimum control measure, a report on the current reporting period, a summary of stormwater controls for the next reporting period, and proposed modifications to the control measure.

#### **3.1 Strategies**

The City will implement the following Strategies as part of their Public Education and Public Involvement Program. To evaluate the success of the program and aid in preparing the Annual Report, evaluation criteria have been established for each Strategy.

##### **Strategy No. 1. Seek and Consider Public Input**

The City will seek and consider public input in the development, modification, and implementation of the Stormwater Management Program. Activities may include, but are not limited to:

- Complying with applicable local and state public notice requirements.
- Providing the public with the name and contact information of the City's stormwater management staff via the City's website, educational materials, and related documents.
- Providing the public with notices in regard to the availability of the Stormwater Management Program document, annual reports, and updates via the City's website, announcements at public meetings, and posting on community bulletin boards.
- Providing the public with the ability to review, comment, and ask questions about the Stormwater Management Program and annual reports

by meeting with individuals on a one-to-one basis or with groups at public meetings.

- Providing a reporting and tracking system as part of the Illicit Discharge Detection and Elimination Program for the public regarding non-compliant construction sites, illicit discharges (including spills and illegal dumping), impaired waterways, and violations or ordinances related to stormwater pollution. The public can contact City Hall to report an issue. The public may file an anonymous complaint or fill-out a Complaint Form that is located in Appendix E of the SWMP.

**Evaluation Criteria:** The City will evaluate the activities for seeking and considering the public's input throughout the reporting period. The annual report will indicate the implementation status for the current reporting period and provide supporting documentation, and will indicate the proposed efforts for the following reporting period.

## **Strategy No. 2. Identify and Address Targeted Pollutants**

The City will identify targeted pollutants such as, litter, floatables, debris, silt, and sediment and will address ways to reduce the amount of these pollutants from entering the MS4. Activities may include, but are not limited to:

- Performing an annual stream walking program of an average of one-half mile per month of waterways within the MS4 to identify problem areas with pollutants and the potential sources.
- Inspecting the designated 37 outfalls, by conducting dry-weather monitoring to determine the type and amount of pollutants located at each outfall.
- Investigating any potential sources of pollutants, documenting the sources with photographs, contacting the responsible person about the pollutant, and provide suggestions for corrective actions.
- Creating and enforcing local ordinances in regard to prohibiting littering and illegal dumping.
- Installing signs at select locations that reference local and state codes that prohibit littering and illegal dumping.

**Evaluation Criteria:** The City will evaluate the activities for identifying and addressing targeted pollutants throughout the reporting period. The annual report will indicate the implementation status for the current reporting period and provide supporting documentation, and will indicate the proposed efforts for the following reporting period.

**Strategy No. 3. Distribution of Stormwater Educational Material**

The City will develop and distribute stormwater educational materials to various public locations (e.g., the public library, city hall, community center, schools, civic groups, and commercial businesses) and community events. Educational materials may include the following topics, but are not limited to:

- Introducing the MS4 to the general public
- Discussing the stormwater cycle and how common contaminants enter the stormwater system
- Educating households and businesses about proper and improper use, storage, and disposal of common household chemicals such as herbicides, pesticides, and fertilizers
- Explaining how the improper use of chemicals can impact stormwater quality
- Explaining what individual households and businesses can do to reduce stormwater pollutants
- Providing information on additional resources pertaining to stormwater and stormwater pollution.
- Providing information on stormwater contacts within the City of Jacksonville and information on reporting potential stormwater violations.
- Providing information about standards the City has adopted for stormwater design, best management practices (BMPs), low impact development (LID), and green infrastructure practice (GIP).

**Evaluation Criteria:** The City will evaluate the educational materials provided throughout the reporting period. The annual report will indicate the implementation status and provide supporting documentation containing the educational materials. The annual report will also indicate the proposed efforts for the following reporting period.

**Strategy No. 4. Municipal Drop-Off Day**

The City will establish and advertise at least one municipal drop-off day during the reporting period for the community to dispose of electronics, used oil, paint, antifreeze, and pesticides at a central location. The City will distribute educational materials to participants on how stormwater can be impacted by improper use, storage, and disposal of various types of materials.

**Evaluation Criteria:** The City will evaluate the success of the event(s) during the reporting period. The annual report will indicate the dates and times, the approximate number of participants, the variety and amount of materials dropped off, and provide supporting documentation containing

advertisements and photos. The annual report will also indicate the proposed efforts for the following reporting period.

**Strategy No. 5. Municipal Clean-Up Day**

The City will establish and advertise at least one municipal clean-up day during the reporting period for volunteers in the community to pick up litter, floatables, and debris from selected areas in the City, such as, rights-of-way, ditches, waterways, and public properties. The City will provide a central location for materials to be dropped off. The City will distribute educational materials.

**Evaluation Criteria:** The City will evaluate the success of the event(s) during the reporting period. The annual report will indicate the dates and times, the approximate number of volunteers, the variety and amount of materials cleaned up, and provide supporting documentation containing advertisements and photos. The annual report will also indicate the proposed efforts for the following reporting period.

**Strategy No. 6. Storm Drain Marking Program**

The City will partner with individuals and/or civic organizations to implement a storm drain marking program to label storm drains with a ‘no dumping’ message. Educational materials may be distributed to homeowners and businesses located in the area at the time the storm drain placards are installed. Educational materials may include, but are not limited to:

- Explanations of what individual households and businesses can do to reduce stormwater pollutants.
- Information on additional resources pertaining to stormwater and stormwater pollution.
- Information on stormwater contacts within the City of Jacksonville and information on reporting potential stormwater violations.

**Evaluation Criteria:** The City will evaluate the success of the program during the reporting period. The annual report will indicate the number of storm drains labeled during the current reporting period, the total number of storm drains labeled to date, the approximate number of storm drains remaining to be labeled, and provide supporting documentation containing photos and placard message. The annual report will also indicate the proposed efforts for the following reporting period.

**Strategy No. 7. Community Festival or Farmer’s Market**

The City’s stormwater management staff will attend at least one community festival or farmer’s market to distribute educational materials. Educational materials and/or displays may include the following topics, but are not limited to:

- Introducing the MS4 to the general public
- Discussing the stormwater cycle and how common contaminants enter the stormwater system
- Educating households and businesses about proper and improper use, storage, and disposal of common household chemicals such as herbicides, pesticides, and fertilizers
- Explaining how the improper use of chemicals can impact stormwater quality
- Explaining what individual households and businesses can do to reduce stormwater pollutants
- Providing information on additional resources pertaining to stormwater and stormwater pollution.
- Providing information on stormwater contacts within the City of Jacksonville and information on reporting potential stormwater violations.
- Providing information about standards the City has adopted for stormwater design, best management practices (BMPs), low impact development (LID), and green infrastructure practice (GIP).

**Evaluation Criteria:** The City will evaluate the success of the event(s) during the reporting period. The annual report will indicate the date and times, the approximate number of people contacted, and provide supporting documentation containing photos. The annual report will also indicate the proposed efforts for the following reporting period.

**Strategy No. 8. Curbside Recycling Program**

The City currently has a City-wide curbside recycling program. The City will advertise the program and encourage citizens to participate. The City will provide containers and will be responsible for picking up the recycling materials and disposing of them in the appropriate manner.

**Evaluation Criteria:** The City will evaluate the success of the program during the reporting period. The annual report will indicate the schedule, the approximate number of participants, the variety and amounts of recyclables picked up and provide supporting documentation containing advertisements and photos. The annual report will also indicate the proposed efforts for the following reporting period.

### **Strategy No. 9. Community Arbor Day Celebration**

The City will establish and advertise an annual community Arbor Day celebration where the City will promote and encourage the community to make the world cleaner and greener by planting trees.

**Evaluation Criteria:** The City will evaluate the success of the celebration during the reporting period. The annual report will indicate the date and time, the approximate number of participants, the approximate number of trees given away to be planted, and provide supporting documentation containing advertisements and photos. The annual report will also indicate the proposed efforts for the following reporting period.

## **3.2 Report on the Current Reporting Period**

During the current reporting period (April 1, 2018 to March 31, 2019), the City of Jacksonville strived to complete the nine (9) Strategies established for the Public Education and Public Involvement on Stormwater Impacts control measure identified in the SWMP.

The following is a narrative report on each Strategy, along with the implementation status (Completed, Not Completed, or In Progress). Supporting Documentation is included in **Appendix B** or as otherwise specified.

### Strategy No. 1 (Public Education and Public Involvement Program)

The following is the assessment of this Strategy:

- A) The City complied with applicable local and state public notice requirements. Included in this report are City Council Minutes that document information that was discussed and/or announced to the public that apply to various SWMP related topics. (see Document Set 18) **Completed**
- B) The City provided the public with the name and contact information of the City's stormwater management staff, educational materials, and stormwater related documents via the City's website. Included in this report is a screen-shot of the City's website showing stormwater management staff contact information, available educational materials, and related documents. (see Document Set 1) **Completed**
- C) The City provided the public with notices in regard to the availability of the Stormwater Management Program document, annual reports, and updates via the City's website, made announcements at public meetings and posted information on community bulletin boards. Included in this report are the various educational materials, photograph of the bulletin board, and screen-shot of the City's website where most items indicate the contact information for obtaining stormwater related information. (see Document Set 1) **Completed**
- D) The City provided the public with the ability to review, comment, and ask questions about the Stormwater Management Program and annual reports by meeting with

- individuals on a one-to-one basis or with groups at public meetings. There were no group meetings. However, there were a few meetings with individuals throughout the reporting period where questions were asked and comments were made about the SWMP. Included in this report are the various educational materials that were available, along with a screen-shot of the City's website where they were asked to reference for stormwater contacts and information. (see Document Set 1) **Completed**
- E) The City provided a reporting and tracking system as part of the Illicit Discharge Detection and Elimination Program. There was (1) citizen complaint (by telephone) in regard to a potential commercial illicit discharge (IDDE #6). The number of Illicit Discharges reported and tracked were (19) municipal and (2) commercial. The number of Sediment and Erosion Control (non-construction) issues reported and tracked were (3) residential. Included in this report are the (21) IDDE Case Logs, (3) Sediment and Erosion Case Logs, Sample Case Logs, and Sample Complaint Form. (see Document Set 11) **Completed**

#### Strategy No. 2 (Identify and Address Targeted Pollutants)

The following is the assessment of this Strategy:

- A) The City performed stream walking of waterways within the City's MS4 Boundary to identify any problem areas with pollutants. There are approximately 23 miles of streams within the City Limits, with approximately 19 miles of those streams lying within the City's MS4 Boundary (including across Jacksonville State University property). The City walked all 19 miles of streams during the previous reporting periods. The City has started the stream walking cycle over again by walking 6 miles during this reporting period. This meets the required average of one-half mile per month. No problem areas with pollutants or potential sources were identified during the stream walking. Except, for the areas noted in item (C) below. Included in this report is a Stream Walking Log denoting the streams walked during the previous reporting period and this reporting period. (see Appendix A - Figures) **Completed**
- B) The City inspected the designated 37 outfalls by conducting dry-weather monitoring. Included in this report are the Dry-Weather Monitoring Reports for each outfall. (see Document Set 19) **Completed**
- C) The City investigated any potential sources of pollutants, documented the sources with photographs/inspection logs, and contacted the responsible person. Included in this report are the inspection summaries of the potential sources of pollutants. They include commercial and residential construction site inspections, locations identified on the IDDE Case Logs, and locations identified on the Sediment and Erosion Control Case Logs. (see Document Set 10 and 11) **Completed**
- D) The City enforced current Ordinances that prohibit littering and illegal dumping. **Completed**
- E) The City installed 0 signs at select locations that referenced local and state codes that prohibit littering and illegal dumping. **Not Completed**

Strategy No. 3 (Distribution of Stormwater Educational Material)

The following is the assessment of this Strategy:

- A) The City introduced, discussed, and educated the general public and businesses on the MS4, stormwater cycle, how common contaminants enter the stormwater system, proper and improper use and storage of household chemicals, how to reduce stormwater pollution, City stormwater contacts, and standards the City has adopted for stormwater design, best management practices (BMPs), low-impact development (LID) and green infrastructure practice (GIP) by providing/distributing educational materials at various locations in the City, by posting stormwater related information on the City’s website, and by distributing stormwater related information at City clean-up days, festivals, and events. Included in this report are the various educational materials that were available for distribution, a screen-shot of the City’s website showing stormwater contacts and information, a photograph of a bulletin board located at City Hall containing stormwater contacts and information. (see Document Set 1) **Completed**

Strategy No. 4 – (Municipal Drop-Off Day)

The following is the assessment of this Strategy:

- A) The City’s Municipal Drop-Off Day (“Take Pride in Jacksonville Day”) was held on April 28, 2018. It was advertised in the newspaper, on the radio, and in flyers prepared for the event. It provided citizens with an opportunity to have sensitive paper documents shredded and to dispose of cardboard, aluminum cans, misc. paper, electronics, used oil, paint, antifreeze, and pesticides at a central location (City Hall), and it provided a free dump day at the City’s Landfill. Included in this report are the advertisements (newspaper articles and flyer), photographs of the event, and a summary of the materials shredded and collected. (see Document Set 2) **Completed**

Strategy No. 5 – (Municipal Clean-Up Day)

The following is the assessment of this Strategy:

- A) The City’s Municipal Clean-Up Day (“Take Pride in Jacksonville Day”) was held on April 28, 2018. It was advertised in the newspaper, on the radio, and in flyers prepared for the event. It provided volunteers with an opportunity to clean-up trash in designated areas within the City. Included in this report are the advertisements (newspaper articles and flyer), photographs of the event, volunteer sign-in sheet, map of areas cleaned-up, and a summary of the materials collected. (see Document Set 2). In addition to the Municipal Clean-up Day, there was a volunteer event titled “Clean Up the Mountain” held on November 4, 2018 to clean-up on Chimney Peak. Included in this report is the advertisement (flyer), photographs of the event, and a volunteer sign-in sheet. (see Document Set 9) **Completed**

Strategy No. 6 – (Storm Drain Marking Program)

The following is the assessment of this Strategy:

- A) The City continued to implement a storm drain marking program and distributed educational materials to nearby homeowners and businesses in the area of the storm drain marking. During this reporting period there were 0 new storm drains marked. However, City staff performed maintenance to some existing placards by reinstalling those that were loose. Approximately 25 placards were reinstalled. City staff distributed educational materials in some of the areas where the storm drain placards were reinstalled. There have been a total of 375 storm drain placards installed to date. The number of storm drains that remain to be marked is approximately 50-250. Included in this report are the various educational materials that were distributed (see Document Set 1) and photographs of the storm drain placard reinstallation. (see Document Set 3) **Completed**

Strategy No. 7 – (Community Festival or Farmer’s Market)

The following is the assessment of this Strategy:

- A) A member of the City staff attended the “Spirit on Mountain Street” festival on August 23, 2018 and distributed educational materials to some of the attendees. Included in this report are the various educational materials that were distributed (see Document Set 1) and the festival advertisement (JSU website). (see Document Set 9) **Completed**

Strategy No. 8 – (Curbside Recycling Program)

The following is the assessment of this Strategy:

- A) The City continued to provide and promote a City-wide Curbside Recycling Program. This program provides an opportunity for citizens to recycle paper/fiber, plastic, bi-metal/tin, aluminum, and other residual materials. Included in this report is a screen-shot of the City’s website showing the garbage, recycling and trash pick-up information, collection information, and the Curbside Recycling Program Summary. (see Document Set 4) **Completed**

Strategy No. 9 – (Community Arbor Day Celebration)

The following is the assessment of this Strategy:

- A) The City and Jacksonville State University (JSU) continued to promote a Community Arbor Day Celebration. A celebration was held on February 21, 2019 at the JSU campus. Prior to the Arbor Day Celebration at JSU, the City held a community tree giveaway titled “Retree Jacksonville, Alabama” on October 20, 2018 at the First Baptist Church of Jacksonville. This tree giveaway was for all residents in the City Limits of Jacksonville and especially those in the north side of the City who lost trees from the March 19, 2018 tornado event. The celebration and giveaway encourages the community to make the world cleaner and greener by planting trees. Included in this report are the advertisements for and about the events,

newspaper articles, an Arbor Day Proclamation from the Mayor, a screen-shot of JSU's website, and photographs / summary of the tree give away.  
(see Document Sets 7 and 8) **Completed**

### 3.3 Summary of Stormwater Controls for the Next Reporting Period

The following Stormwater Controls (Strategies) are planned/scheduled for the next reporting period as part of the Public Education and Public Involvement Program. **The proposed efforts indicated in the Evaluation Criteria for each Strategy in Section 3.1 of this report will remain the same for the next reporting period.**

- Strategy No. 1 – (Seek and Consider Public Input)
- Strategy No. 2 – (Identify and Address Targeted Pollutants)
- Strategy No. 3 – (Distribution of Stormwater Education Material)
- Strategy No. 4 – (Municipal Drop-Off Day)
- Strategy No. 5 – (Municipal Clean-Up Day)
- Strategy No. 6 – (Storm Drain Marking Program)
- Strategy No. 7 – (Community Festival or Farmer's Market)
- Strategy No. 8 – (Curbside Recycling Program)
- Strategy No. 9 – (Community Arbor Day Celebration)

### 3.4 Proposed Modifications

The City proposes to make the following modification(s) to the Public Education and Public Involvement on Stormwater Impacts control measure: **None at this time**

Prior to the City making the above modification(s), the City shall submit the proposed modification(s) to the ADEM for review. Upon completion of the ADEM review, the modification(s) will be made to the SWMP.

## 4. ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDDE) PROGRAM

The following section contains: strategies for the minimum control measure, a report on the current reporting period, a summary of stormwater controls for the next reporting period, and proposed modifications to the control measure.

## 4.1 Strategies

The City will implement the following strategies as part of their Illicit Discharge Detection and Elimination Program. To evaluate the success of the program and aid in preparing the Annual Report, evaluation criteria have been established for each strategy.

### **Strategy No. 1. Illicit Discharge Potential (IDP) Assessment**

The City will identify priority areas within the MS4, which are those areas more likely to have illicit discharges. Typically, illicit discharges are not uniformly distributed across a community. Instead, illicit discharges are generally clustered within areas defined by characteristics such as land use or infrastructure age. The process to identify priority areas by performing the IDP Assessment is detailed in Section 3 of the IDDE Program located in Appendix C of the SWMP.

**Evaluation Criteria:** The City will perform the illicit discharge potential (IDP) calculations for each subwatershed within the MS4 area prior to the start of the next reporting period. The annual report will include the IDP worksheets and the subwatershed IDP Rating Map. The annual report will also indicate the proposed efforts for the following reporting period. The City will report subwatersheds that are newly listed or de-listed from the previous reporting period.

### **Strategy No. 2. Outfall Verification**

The City will evaluate the existing outfalls identified during the previous reporting period. There are currently 37 outfalls identified on the City's GIS database. The City will add previously unknown outfalls as the GIS mapping is updated with new or revised data. The field assessment activities are detailed in Section 4 of the IDDE Program located in Appendix C of the SWMP.

**Evaluation Criteria:** The City will perform dry-weather monitoring to evaluate all existing outfalls, and will identify any previously unknown outfalls during the reporting period. The annual report will indicate the number of existing outfalls evaluated, the number of previously unknown outfalls identified, and provide supporting documentation containing Dry-Weather Monitoring Reports for each. The annual report will also indicate the proposed efforts for the following reporting period.

### **Strategy No. 3. Outfall Identification**

The City will implement a stream-walking program designed to identify previously unknown outfalls to the MS4. There are three main waterbodies

that leave the MS4 area, with an estimated total of approximately 23 miles of stream length within the City Limits. The City plans to complete an average of one-half mile of stream inventory within the MS4 area per month during the reporting period. The process is detailed in Section 4 of the IDDE Program located in Appendix C of the SWMP.

**Evaluation Criteria:** The City will perform stream-walking to identify previously unknown outfalls to the MS4 during the reporting period. The annual report will indicate the length of streams walked within the MS4 area and provide supporting documentation containing maps that include new outfalls identified. The annual report will also indicate the proposed efforts for the following reporting period.

**Strategy No. 4. Outfall Inventory**

The City will conduct visual inspections (dry-weather monitoring) of all existing outfalls within the City at least once per reporting period during each five-year permit cycle. Outfalls in priority areas will also be visually inspected once per year. The process is detailed in Section 7 of the IDDE Program document located in Appendix C of the SWMP.

**Evaluation Criteria:** The City will perform an outfall inventory of all existing outfalls at least once per reporting period. The annual report will indicate the number of outfalls identified/inspected in priority areas and outside priority areas and will provide supporting documentation containing the Dry-weather Monitoring Reports.

The annual report will also indicate the proposed efforts for the following reporting period.

**Strategy No. 5. Suspect Discharge Sampling**

The City will perform discharge sampling if a discharge has a severity of either odor, color, turbidity, floatables, or if field screening indicates a suspect discharge. Field crews will collect samples for further analysis. The process is detailed in Section 7 of the IDDE Program located in Appendix C of the SWMP. All parameters to be analyzed for are listed on the Dry-weather Monitoring Report located in Appendix E of the SWMP.

**Evaluation Criteria:** The City will perform discharge sampling as specified during the reporting period. The annual report will indicate the number of illicit discharges identified during the dry-weather monitoring or stream-walking program, suspect illicit discharges, samples collected, and will provide supporting documentation that contains laboratory analysis results for any collected samples, confirmation of suspect illicit discharges, the type of

illicit discharge, if a source was determined, and if the source was eliminated. The annual report will also indicate the proposed efforts for the following reporting period.

**Strategy No. 6. Outfall Designation**

The City will analyze the data from the Dry-weather Monitoring Report for each outfall and designate the outfall as having obvious, suspect, possible, or unlikely illicit discharge potential. Obvious and suspect illicit discharge potential will be investigated within 5 and 7 days, respectively. Potential illicit discharges will be investigated within 14 days. The process is detailed in Section 7 of the IDDE Program located in Appendix C of the SWMP.

**Evaluation Criteria:** The City will evaluate the process of designating the illicit discharge potential of each outfall during the reporting period. The annual report will indicate the number of outfalls designated obvious, suspect, possible, or unlikely, the number requiring further investigation, and provide supporting documentation (Dry-Weather Monitoring Reports) containing the outfall designation. The annual report will also indicate the possible efforts for the following reporting period.

**Strategy No. 7. Discharge Investigation**

Based upon the outfall designation, the City will investigate to confirm the source of illicit discharge problems. The process is detailed in Section 7 of the IDDE Program located in Appendix C of the SWMP.

**Evaluation Criteria:** The City will evaluate the process of investigating outfalls with illicit discharge potentials of obvious, suspect, and possible during the reporting period. The annual report will indicate the number of illicit discharge investigations and the number of confirmed illicit discharges. The annual report will also indicate the proposed efforts for the following reporting period.

**Strategy No. 8. Corrective Action Record Keeping**

When a suspect illicit discharge or illicit connection is identified, the City will fill out an Illicit Discharge Detection and Elimination Program Case Log detailing pertinent information. Throughout the problem investigation and corrective action activities, all information related to the incident or property in question will be documented in the case log.

**Evaluation Criteria:** The City will evaluate the process of filling out the pertinent information on the Illicit Discharge Detection and Elimination Program Case Log. The annual report will indicate the number of confirmed

illicit discharges or illicit connections, the number of corrected or eliminated illicit discharges or connections, and provide supporting documentation containing a sample IDDE or actual case logs. The annual report will also indicate the proposed efforts for the following reporting period.

**Strategy No. 9. Update Storm Sewer GIS Map – Existing Features**

The City will update the City’s GIS storm sewer map with existing storm sewer features, such as, inlets, pipes, manholes, and junction boxes by using GIS data and field observations. The process is detailed in Section 5 of the IDDE Program located in Appendix C of the SWMP.

**Evaluation Criteria:** The City will evaluate the process of updating the GIS storm sewer map with existing storm sewer features as they are identified during the reporting period. The annual report will indicate if updates have been made and will provide supporting documentation containing the current version of the GIS storm sewer map. The annual report will also indicate the proposed efforts for the following reporting period.

**Strategy No. 10. Update Storm Sewer GIS Map – New Additions**

The City will update the City’s GIS storm sewer map with new addition of storm sewer features such as, inlets, pipes, manholes, and junction boxes. These new additions will be based upon construction plans and field observations of both public and private projects. The implementation process is detailed in Section 5 of the IDDE Program located in Appendix C of the SWMP.

**Evaluation Criteria:** The City will evaluate the process of updating the GIS storm sewer map with new addition of storm sewer features as construction plans in electronic format and field observations become available during the reporting period. The annual report will if indicate updates have been made and will provide supporting documentation containing the current version of the GIS storm sewer map. The annual report will also indicate the proposed efforts for the following reporting period.

**Strategy No. 11. Evaluate Ordinance**

On February 24, 2014, the City adopted Ordinance O-563-14 to create Article IV (Illicit Discharge and Connection Ordinance) in Chapter 12 (Floods) of the Code of Ordinances of the City of Jacksonville, Alabama. A copy of the ordinance is located in Appendix D of the SWMP.

### **Prohibit Illicit Discharges**

Section 12-138 of the ordinance prohibits non- stormwater discharges into the storm sewer system, with the exception of those non-storm discharges explicitly exempted in the ordinance. Section 12-138 of the ordinance prohibits illicit connections.

### **Enforcement**

The ordinance provides the City with the ability to perform inspections, trace suspected illicit discharges, require elimination of confirmed illicit discharges, and compel compliance.

Section 12-144 of the ordinance describes the enforcement actions available to the City. Enforcement actions include a warning notice, a notice of violation, suspension of MS4 access, alternative compensatory actions (e.g., storm drain stenciling, attendance at compliance workshops, creek cleanup, etc.), civil penalties, and criminal prosecution.

**Evaluation Criteria:** The City will evaluate the ordinance on its effectiveness in addressing identified illicit discharges and illicit connections and preventing repeat offenders during the reporting period. The annual report will indicate if changes were deemed necessary. The annual report will also indicate the proposed efforts for the following reporting period.

### **Strategy No. 12. Distribution of IDDE Educational Materials**

The City will develop and distribute educational materials that highlights the identification and reporting of illicit discharges and illicit connections to various public locations (e.g., the public library, city hall, community center, schools, civic groups, and commercial businesses) and community events. Educational materials may include the following topics, but are not limited to:

- Explaining what an illicit discharge is and how it can be detected
- Discussing the stormwater cycle and how common contaminants enter the stormwater system
- Educating households and businesses about proper and improper use, storage, and disposal of common household chemicals such as herbicides, pesticides, and fertilizers and how the improper use of chemicals can impact stormwater quality
- Explaining what individual households and businesses can do to reduce stormwater pollutants
- Providing information on stormwater contacts within the City of Jacksonville and information on reporting potential stormwater violations.

**Evaluation Criteria:** The City will evaluate the educational materials provided throughout the reporting period. The annual report will indicate the implementation status and provide supporting documentation containing the educational materials. The annual report will also indicate the proposed efforts for the following reporting period.

**Strategy No. 13. Municipal Drop-Off Day**

The City will establish and advertise at least one municipal drop-off day during each reporting period for the community to dispose of such items as electronics, used oil, paint, antifreeze, and pesticides. The City will distribute educational materials to the participants on how illicit discharges and illegal dumping can be reduced by the proper use, storage, and disposal of materials that can cause stormwater pollution.

**Evaluation Criteria:** The City will evaluate the success of the event(s) during the reporting period. The annual report will indicate the dates and times, the approximate number of participants, the variety and amount of materials dropped off, and will provide supporting documentation that contains advertisements and photos. The annual report will also indicate the proposed efforts for the following reporting period.

**Strategy No. 14. Storm Drain Marking Program**

The City will partner with individuals and/or civic organizations to implement a storm drain marking program to label storm drains with a ‘no dumping’ message. Educational materials may be distributed to homeowners and businesses located in the area at the time the storm drain placards are installed. Educational materials may include, but are not limited to:

- Explanations of what individual households and businesses can do to reduce stormwater pollutants.
- Information on additional resources pertaining to stormwater and stormwater pollution.
- Information on stormwater contacts within the City of Jacksonville and information on reporting potential stormwater violations.

**Evaluation Criteria:** The City will evaluate the success of the program during the reporting period. The annual report will indicate the number of storm drains labeled during the current reporting period, the total number of storm drains labeled to date, the approximate number of storm drains remaining to be labeled, and provide supporting documentation containing photos and placard message. The annual report will also indicate the proposed efforts for the following reporting period.

**Strategy No. 15. Reporting and Tracking System for Complaints**

The City will provide a reporting and tracking system for the public regarding illicit discharges (including spills or illegal dumping), impaired waterways, and violations of ordinances relating to stormwater pollution. The public can contact City Hall to report an issue. The public may file an anonymous complaint or fill out the Complaint Form located in Appendix E of the SWMP. The City will track the complaint, resolve the complaint, or determine the complaint lacked sufficient information to resolve.

**Evaluation Criteria:** The City will evaluate the reporting and tracking system during the reporting period. The annual report will indicate the number of complaints received, the number of complaints resolved, and the number of complaints that lacked sufficient information to resolve. The annual report will also indicate the proposed efforts for the following reporting period.

**Strategy No. 16. Municipal Training**

In conjunction with the training of municipal employees detailed in Section 10.3 of the IDDE Program, municipal employees will be trained in the identification of illicit discharges and in procedures for reporting them within the City organization, as well as the prevention of stormwater pollution at municipal facilities or related to municipal activities. Specific municipal operations such as fueling, vehicle maintenance, vehicle washing, paint and paint waste storage and disposal, and used oil disposal may be addressed.

**Evaluation Criteria:** The City will evaluate the topics and methods used to train municipal employees during the reporting period. The annual report will indicate if training was conducted and will provide supporting documentation containing training topics and attendance records. The annual report will also indicate the proposed efforts for the following reporting period.

**Strategy No. 17. NPDES Permit Program**

As authorized by the Clean Water Act, the NPDES Permit Program controls water pollution by regulating point sources that discharge pollutants into waters of the United States. Title 40, Part 122 of the Code of Federal Regulations (40CFR122) specifies that discharges associated with an industrial activity must obtain an NPDES permit. The ADEM currently provides for individual and general NPDES permitting of regulated industries. Information pertaining to permitted facilities will be obtained from available public sources such as MYWATERS Mapping,

EPA ECHO Database, and the ADEM E-file and incorporated into the GIS database. This information will be used in conjunction with the GIS mapping and monitoring data to evaluate potential sources of stormwater pollution.

Unpermitted regulated facilities will be reported to the Industrial Permits Section of the ADEM. The City will rely on the ADEM for NPDES industrial permitting enforcement.

**Evaluation Criteria:** The City will evaluate the process of relying on the ADEM for industrial NPDES permitting enforcement during the reporting period. The City will report any known unpermitted regulated facilities to the ADEM Industrial Permit Section. The annual report will indicate the number of unpermitted facilities reported to the ADEM. The annual report will also indicate the proposed efforts for the following reporting period.

## 4.2 Report on the Current Reporting Period

During the current reporting period (April 1, 2018 to March 31, 2019), the City of Jacksonville strived to complete the seventeen (17) Strategies established for the Illicit Discharge Detection and Elimination control measure identified in the SWMP.

The following is a narrative report on each Strategy, along with the implementation status (Completed, Not Completed, or In Progress). Supporting documentation is included in **Appendix B** or as otherwise specified.

### Strategy No. 1 (Illicit Discharge Potential (IDP) Assessment)

The following is the assessment of this Strategy:

- A) The City performed the Illicit Discharge Potential Assessment (IDP) in order to identify any priority areas within the City's MS4 Boundary. These priority areas are the subwatersheds that are more likely to have illicit discharges. There were 0 priority areas identified. Included in this report are the IDP Worksheets for the subwatersheds (zones 1-10) (see Document Set 20) and the Subwatershed IDP Rating Map. (see Appendix A - Figures) **Completed**

### Strategy No. 2 (Outfall Verification)

The following is the assessment of this Strategy:

- A) The City performed the Outfall Verification in order to evaluate the existing outfalls identified during the previous reporting period. There were currently 37 outfalls identified. The method of evaluating the outfalls was by performing Dry-Weather Monitoring. Included in this report are the Dry-Weather Monitoring Reports for each

of the 37 outfalls (see Document Set 19) and the Jacksonville Storm Sewer System Map showing the location of the outfalls. (see Appendix A – Figures) **Completed**

#### Strategy No. 3 (Outfall Identification)

The following is the assessment of this Strategy:

- A) The City performed stream walking of waterways within the City’s MS4 Boundary to not only identify any problem areas with pollutants, but to perform Outfall Identification in order to identify previously unknown outfalls to the MS4. There were 0 additional outfalls identified during this reporting period. However, additional outfalls will be added in the future. There are approximately 23 miles of streams within the City Limits, with approximately 19 miles of those streams lying within the City’s MS4 Boundary (including across Jacksonville State University property). The City walked all 19 miles of streams during the previous reporting periods. The City has started the stream walking cycle over again by walking 6 miles during this reporting period. This meets the required average of one-half mile per month. Included in this report is a Stream Walking Log denoting the streams walked during this reporting period.  
(see Appendix A - Figures) **Completed**

#### Strategy No. 4 (Outfall Inventory)

The following is the assessment of this Strategy:

- A) The City performed the Outfall Inventory in order to conduct visual inspections of the existing outfalls. There are currently 37 outfalls identified, of which all were inspected during this reporting period. The method of inspecting the outfalls was by performing Dry-Weather Monitoring. Included in this report are the Dry-Weather Monitoring Reports for each of the 37 outfalls (see Document Set 19) and the Jacksonville Storm Sewer System Map showing the location of the outfalls.  
(see Appendix A – Figures) **Completed**

#### Strategy No. 5 (Suspect Discharge Sampling)

The following is the assessment of this Strategy:

- A) The City did not have to perform any Suspect Discharge Sampling. There were no illicit discharges identified during the dry-weather monitoring or stream walking programs. Included in this report are the Dry-Weather Monitoring Reports for each of the 37 outfalls (see Document Set 19) and a Stream Walking Log denoting the streams walked during this reporting period. (see Appendix A - Figures) **Completed**

#### Strategy No. 6 (Outfall Designation)

The following is the assessment of this Strategy:

- A) The City analyzed the data from the Dry-Weather Monitoring Reports and designated each of the 37 outfalls as having obvious, suspect, possible, or unlikely illicit discharge potential. There were 0 obvious, 0 suspect, 19 possible, and 18 unlikely.

The 19 outfalls that were designated as having possible illicit discharge potential was based entirely upon current land use in the area. Each of the 19 outfalls was investigated again within 14 days and there was no evidence of illicit discharges at that time. Included in this report are the Dry-Weather Monitoring Reports for each of the 37 outfalls. (see Document Set 19) **Completed**

#### Strategy No. 7 (Discharge Investigation)

The following is the assessment of this Strategy:

- A) The City has made periodic investigations at the 19 outfalls that were designated as having possible illicit discharge potential. There have been 0 confirmed illicit discharges at these outfalls. Included in this report are the Dry-Weather Monitoring Reports for each of the 37 outfalls. (see Document Set 19) **Completed**

#### Strategy No. 8 (Corrective Action Record Keeping)

The following is the assessment of this Strategy:

- A) The City confirmed 24 illicit discharges after receiving notifications by self-reporting, citizen complaints or other means. A Case Log was created for each situation. The Jacksonville Water Works, Gas & Sewer Board self-reported 19 sanitary sewer overflows (IDDE Case Log #1 - #5, #7 - #12, #14 - #21) and performed corrective actions to eliminate the illicit discharges. A citizen complained by telephone about 1 potential illicit discharge on a commercial property (IDDE Case Log #6) and it was confirmed to be an illicit discharge. City staff identified 1 potential illicit discharge on a commercial property (IDDE Case Log #13) and it was confirmed to be an illicit discharge. The two commercial property owners performed corrective actions to eliminate the illicit discharges. City staff identified 3 issues with sediment and erosion control (non-construction) on residential properties and it was confirmed to be an illicit discharge. Two of the property owners (Sediment and Erosion Case Logs #1 and #3) have performed corrective actions and property owner (Sediment and Erosion Control Case Log #2) had not performed corrective actions as of the end of this reporting period. Included in this report are the IDDE Case Logs (#1 - #21), Sediment and Erosion Control Case Logs (#1 - #3), and the Complaint Form (sample). (see Document Set 11) **Completed**

#### Strategy No. 9 (Update Storm Sewer GIS Map – Existing Features)

The following is the assessment of this Strategy:

- A) The City evaluated the process of updating the current version of the Storm Sewer GIS Map. There were 0 existing storm sewer features identified during this reporting period, therefore no updates were made to the Storm Sewer GIS Map. However, updates are planned for the future. Included in this report is the Jacksonville Storm Sewer System Map showing the current GIS information. (see Appendix A – Figures) **Not Completed**

Strategy No. 10 (Update Storm Sewer GIS Map – New Additions)

The following is the assessment of this Strategy:

- A) The City evaluated the process of updating the current version of the Storm Sewer GIS Map. There were 0 new additions to the storm sewer features added during this reporting period, therefore no updates were made to the Storm Sewer GIS Map. However, updates are planned for the future. Included in this report is the Jacksonville Storm Sewer System Map showing the current GIS information. (see Appendix A – Figures) **Not Completed**

Strategy No. 11 (Evaluate Ordinance)

The following is the assessment of this Strategy:

- A) The City evaluated the Illicit Discharge and Connection Ordinance on its effectiveness in addressing illicit discharges, illicit connections and preventing repeat offenders. It was determined that the current Ordinance was adequate and no changes were deemed necessary. **Completed**

Strategy No. 12 (Distribution of IDDE Educational Material)

The following is the assessment of this Strategy:

- A) The City introduced, discussed and educated the general public and businesses on what an illicit discharge is and how it can be detected, stormwater cycle, how common contaminants enter the stormwater system, proper and improper use and storage of household chemicals, how to reduce stormwater pollution, and City stormwater contacts, by providing/distributing educational materials at various locations in the City, by posting stormwater related information on the City’s website, and by distributing stormwater related information at City clean-up days, festivals, and events. Included in this report are the various educational materials that were available for distribution, a screen-shot of the City’s website showing stormwater contacts and information, a photograph of a bulletin board located at City Hall containing stormwater contacts and information. (see Document Set 1) **Completed**

Strategy No. 13 – (Municipal Drop-Off Day)

The following is the assessment of this Strategy:

- A) The City’s Municipal Drop-Off Day (“Take Pride in Jacksonville Day”) was held on April 28, 2018. It was advertised in the newspaper, on the radio, and in flyers prepared for the event. It provided citizens with an opportunity to have sensitive paper documents shredded and to dispose of cardboard, aluminum cans, misc. paper, electronics, used oil, paint, antifreeze, and pesticides at a central location (City Hall). It also provided a free dump day at the City’s Landfill. Included in this report are the advertisements (newspaper articles and flyer), photographs of the event, and a summary of the materials shredded and collected. (see Document Set 2) **Completed**

Strategy No. 14 – (Storm Drain Marking Program)

The following is the assessment of this Strategy:

- A) The City continued to implement a storm drain marking program and distributed educational materials to nearby homeowners and businesses in the area of the storm drain marking. During this reporting period there were 0 new storm drains marked. However, City staff performed maintenance to some existing placards by reinstalling those that were loose. Approximately 25 placards were reinstalled. City staff distributed educational materials in some of the areas where the storm drain placards were reinstalled. There have been a total of 375 storm drain placards installed to date. The number of storm drains that remain to be marked is approximately 50-250. Included in this report are the various educational materials that were distributed (see Document Set 1) and photographs of the storm drain placard reinstallation. (see Document Set 3) **Completed**

Strategy No. 15 (Reporting and Tracking System for Complaints)

The following is the assessment of this Strategy:

- A) The City provided a reporting and tracking system for the public regarding illicit discharges (including spills and illegal dumping), impaired waterways, and violations of ordinances relating to stormwater pollution. There was 1 citizen complaint received by telephone about a potential illicit discharge on a commercial property (IDDE Case Log #6). The City tracked the complaint and it was confirmed to be an illicit discharge. The commercial property owner performed corrective actions to eliminate the illicit discharge. There was 0 complaints received from a citizen about sediment and erosion control issues (construction and non-construction). Included in this report is IDDE Case Log #6. (see Document Set 11) **Completed**

Strategy No. 16 (Municipal Training)

The following is the assessment of this Strategy:

- A) The City conducted training for the municipal employees in various departments. Training in regard to “Stop Pointless Personal Pollution” was provided on January 9, 2019 to employees at the City Hall, Utility Board Office, Utility Board Maintenance Shop, Waste Water Treatment Plant, Public Library, Street Department, Fire Department, Police Department, and Parks and Recreation Department. Additional training in regard to a variety of stormwater related topics was provided to the Street and Sanitation Department at their monthly safety meetings. Included in this report are the training topics and attendance logs. (see Document Set 16) **Completed**

Strategy No. 17 (NPDES Permit Program)

The following is the assessment of this Strategy:

- A) The City continues to rely on the ADEM for industrial NPDES permitting enforcement. There were 0 unpermitted regulated facilities determined by the City. Therefore, 0 were reported to the ADEM Industrial Permit Section. **Completed**

### 4.3 Summary of Stormwater Controls for the Next Reporting Period

The following Stormwater Controls (Strategies) are planned/scheduled for the next reporting period as part of the Illicit Discharge Detection and Elimination (IDDE) Program. **The proposed efforts indicated in the Evaluation Criteria for each Strategy in Section 4.1 of this report will remain the same for the next reporting period.**

- Strategy No. 1 – (Illicit Discharge Potential (IDP) Assessment)
- Strategy No. 2 – (Outfall Verification)
- Strategy No. 3 – (Outfall Identification)
- Strategy No. 4 – (Outfall Inventory)
- Strategy No. 5 – (Suspect Discharge Sampling)
- Strategy No. 6 – (Outfall Designation)
- Strategy No. 7 – (Discharge Investigation)
- Strategy No. 8 – (Corrective Action Record Keeping)
- Strategy No. 9 – (Update Storm Sewer GIS Map – Existing Features)
- Strategy No. 10 – (Update Storm Sewer GIS Map – New Additions)
- Strategy No. 11 – (Evaluate Ordinance)
- Strategy No. 12 – (Distribution of IDDE Educational Materials)
- Strategy No. 13 – (Municipal Drop-Off Day)
- Strategy No. 14 – (Storm Drain Marking Program)
- Strategy No. 15 – (Reporting and Tracking System for Complaints)
- Strategy No. 16 – (Municipal Training)
- Strategy No. 17 – (NPDES Permit Program)

### 4.4 Proposed Modifications

The City proposes to make the following modification(s) to the Illicit Discharge Detection and Elimination (IDDE) Program control measure: **None at this time**

Prior to the City making the above modification(s), the City shall submit the proposed modification(s) to the ADEM for review. Upon completion of the ADEM review, the modification(s) will be made to the SWMP.

## 5. CONSTRUCTION SITE STORM WATER RUNOFF CONTROL

The following section contains: strategies for the minimum control measure, a report on the current reporting period, a summary of stormwater controls for the next reporting period, and proposed modifications to the control measure.

### 5.1 Strategies

The City will implement the following Strategies as part of their Construction Site Storm Water Runoff Control Program. To evaluate the success of the program and aid in preparing the Annual Report, evaluation criteria have been established for each strategy.

#### **Strategy No. 1. Stormwater Run-off Management Ordinance**

The City will implement and enforce the Stormwater Run-off Management Ordinance in Chapter 12, Article II of the Code of Ordinances of the City of Jacksonville, Alabama.

A copy of the Stormwater Run-off Management Ordinance is located in Appendix D of the SWMP.

**Evaluation Criteria:** The City will evaluate the Stormwater Run-off Management Ordinance to ensure that regulations and policies are in place to effectively implement and enforce the requirements of the ADEM NPDES Permit No. ALR040051 to the maximum extent practicable during the reporting period. The annual report will indicate if updates were deemed necessary and will provide supporting documentation that contains the updates. The annual report will also indicate the proposed efforts for the following reporting period.

#### **Strategy No. 2. Require Qualifying Sites to Obtain an ADEM NPDES Construction General Permit**

The City will enforce the requirement for qualifying sites to obtain an ADEM NPDES Construction General Permit (ALR100000) and all other sites shall have a Best Management Practices (BMP) Plan designed as per the requirements detailed in the City's Application for Development Review and such plan shall be approved by the Planning Commission or City staff. A copy of the Application for Development Review is located in Appendix E of the SWMP.

In order to better ensure that qualifying sites obtain the required ADEM NPDES Construction General Permit, the City has anyone obtaining a Building Permit that involves ground disturbing activity to sign an ADEM

NPDES General Permit Acknowledgement document acknowledging that the City informed them that their site may be subject to a permit. A copy of this document is located in Appendix E of the SWMP.

As provided by 40CFR Part 122.35(b), the City intends to rely on the ADEM for NPDES Construction General Permit standards and enforcement.

**Evaluation Criteria:** The City will evaluate the method of verifying that qualifying sites have obtained an ADEM NPDES Construction General Permit during the reporting period. The annual report will indicate the number of sites that provide proof of permitting, the number of sites that a document was signed acknowledging that a permit may be required, and will provide supporting documentation containing copies of permits obtained. The annual report will also indicate the proposed efforts for the following reporting period

**Strategy No. 3. Construction Site Inspections**

The City will rely on the Planning, Development & Stormwater Director to perform construction site inspections of qualifying sites. The inspections will be performed at minimum on a monthly basis or after a qualifying rain event. The inspection will include evaluating the installation, maintenance, and effectiveness of the Best Management Practices. Photographs will be made and a Stormwater Construction Site Inspection Report will be filled out to document the findings of the inspection.

**Evaluation Criteria:** The City will evaluate the method of performing construction site inspections during the reporting period. The Annual report will indicate if the inspections of qualifying sites were performed and will provide supporting documentation containing summaries of the various inspections performed. The annual report will also indicate the efforts proposed for the following reporting period.

**Strategy No. 4. Best Management Practices Plan Review**

The City will maintain the requirement to review Best Management Practices (BMP) Plans for qualifying sites. The review will ensure that BMP Plans are designed as per the requirements detailed in the City's Application for Development Review located in Appendix E of the SWMP and the regulations of the City's Stormwater Run-off Management Ordinance located in Appendix D of the SWMP.

**Evaluation Criteria:** The City will evaluate the method of reviewing the BMP Plans during the reporting period. The annual report will indicate if BMP Plans for qualifying sites were reviewed and the number of BMP Plans

reviewed. The annual report will also indicate the proposed efforts for the following reporting period

**Strategy No. 5. BMP Training Program**

The City will maintain at least one municipal employee that is qualified by ADEM to conduct construction site inspections and BMP Plan reviews. These employees will undergo annual training on proper design, installation, maintenance, and inspection of Best Management Practices. The inspector will obtain either Qualified Credentialed Inspector (QCI) or Certified Professional in Erosion and Sediment Control (CPESC) certification.

**Evaluation Criteria:** The City will evaluate the BMP training program and the municipal employee(s) who are tasked with inspections and plan reviews during the reporting period. The annual report will indicate who the inspector was and their qualifications and will provide supporting documentation containing qualifications and certifications. The annual report will also indicate the proposed efforts for the following reporting period.

**Strategy No. 6. Notifying ADEM of Non-Compliant Construction Sites**

The City will notify the ADEM Birmingham Field Office by telephone and email of any non-compliant construction site where a possible violation of the Clean Water Act has occurred. Possible notifications may include, but are not limited to, releases of sediment to a water of the State, failure to obtain an ADEM NPDES Construction General Permit, or failure to initiate compliance with the City's enforcement actions.

It is the City's intent to implement their own enforcement program and only rely on the ADEM for the setting of standards for appropriate erosion controls and sediment controls for qualifying construction sites, but not the enforcement of such standards.

**Evaluation Criteria:** The City will evaluate the method of notifying the ADEM of non-compliant construction sites during the reporting period. The annual report will indicate the number of non-compliant construction sites reported to the ADEM, the number of non-compliant construction sites investigated by the City, and will provide supporting documentation containing pertinent information of the non-complaint construction sites. The annual report will also indicate the proposed efforts for the following reporting period.

**Strategy No. 7. Reporting and Tracking System for Complaints**

The City will provide a reporting and tracking system for the public regarding erosion and sedimentation from construction sites, impaired waterways, and

violations of ordinances relating to stormwater pollution. The public can contact City Hall to report an issue. The public may file an anonymous complaint or fill out the Complaint Form located in Appendix E of the SWMP. The City will track the complaint, resolve the complaint, or determine the complaint lacked sufficient information to resolve.

**Evaluation Criteria:** The City will evaluate the reporting and tracking system during the reporting period. The annual report will indicate the number of complaints received, the number of complaints resolved, and the number of complaints that lacked sufficient information to resolve. The annual report will also indicate the proposed efforts for the following reporting period.

## 5.2 Report on the Current Reporting Period

During the current reporting period (April 1, 2018 to March 31, 2019), the City of Jacksonville strived to complete the seven (7) Strategies established for the Construction Site Stormwater Runoff Control control measure identified in the SWMP.

The following is a narrative report on each Strategy, along with the implementation status (Completed, Not Completed, or In Progress). Supporting documentation is included in **Appendix B** or as otherwise specified.

### Strategy No. 1 (Stormwater Run-off Management Ordinance)

The following is the assessment of this Strategy:

- A) The City evaluated the Stormwater Run-off Management Ordinance to ensure that regulations and policies were in place to effectively implement and enforce the requirements of the City's ADEM NPDES Permit No. ALR040051 to the maximum extent practicable. It was determined that the current Ordinance was adequate and no changes were deemed necessary. However, an update to the Ordinance is planned for the future. **Completed**

### Strategy No. 2 (Require Qualifying Sites to Obtain an ADEM NPDES Construction General Permit)

The following is the assessment of this Strategy:

- A) The City required that all qualifying sites obtain an ADEM NPDES Construction General Permit and all other sites to have a BMP Plan as required by the City's Application for Development Review. In order to better ensure that a qualifying site obtains the required permit, the City had anyone obtaining a City Building Permit that involves ground disturbing activity to sign an ADEM NPDES Construction General Permit Acknowledgement Document stating that the City informed them that their site may be subject to a permit. NOTE: On February 20, 2019 a SWMP modification

was made to remove this document (see Document Set 21). The City inspected 2 commercial construction sites (1 required a City Building Permit). There were 2 of the 2 that provided proof of an ADEM NPDES Construction General Permit. There were 0 of the 2 that signed the Acknowledgement Document. The City inspected 35 residential construction sites (35 required a City Building Permit). There were 24 of the 35 that signed the Acknowledgement Document. There were 12 of the 35 that did not require an ADEM permit. There were 19 of the 35 that did require an ADEM permit, but did not obtain it. There were 4 of the 35 that provided proof of an ADEM NPDES Construction General Permit. Included in this report are the Summary of Commercial Construction Site Inspections and Residential Construction Site Inspections along with a sample of the ADEM NPDES Construction General Permit Acknowledgement Document. (see Document Set 10) **Completed**

**NOTE: The ADEM performed a Phase II MS4 Audit on February 19, 2019. As a result of the audit, the ADEM issued a Notice of Violation (NOV) on March 29, 2019. Violation No.1 was due to the City not requiring/verifying that all qualifying sites obtain an ADEM NPDES Construction General Permit. The City provided ADEM with a written reply to the NOV on April 25, 2019. Included in this report are the various documents pertaining to the ADEM Audit, ADEM NOV and the City’s Written Reply to the NOV. (see Appendix D)**

Strategy No. 3 (Construction Site Inspections)

The following is the assessment of this Strategy:

- A) The City performed construction site inspections on ground disturbing commercial or residential projects located within the City’s MS4 Boundary whether or not it had a City Building Permit. Also, the City identified and inspected sediment and erosion control issues (non-construction) that were located within the City’s MS4 Boundary. The City inspected 2 commercial construction sites, 35 residential construction sites, and 3 sediment and erosion control issues (non-construction). Included in this report are the Summary of Commercial Construction Site Inspections, Summary of Residential Construction Site Inspections, Summary of Sediment and Erosion Control Issues (non-construction) Inspections, and “Success Photos” of various locations and issues. (see Document Set 10) **Completed**

**NOTE: The ADEM performed a Phase II MS4 Audit on February 19, 2019. As a result of the audit, the ADEM issued a Notice of Violation (NOV) on March 29, 2019. Violation No.2 was due to the City not performing inspections at a minimum on a monthly basis or after a qualifying rain event. The City provided ADEM with a written reply to the NOV on April 25, 2019. Included in this report are the various documents pertaining to the ADEM Audit, ADEM NOV and the City’s Written Reply to the NOV. (see Appendix D)**

Strategy No. 4 (Best Management Practices Plan Review)

The following is the assessment of this Strategy:

- A) The City performed reviews of Best Management Practices Plans on commercial projects that applied for Development Review. On residential projects, the City coordinated with the owners and contractors to develop and install the appropriate Best Management Practices for their projects. The City reviewed Best Management Practices Plans for 1 commercial construction sites, coordinated Best Management Practices for 35 residential construction sites, and provided suggestions for improving 2 sediment and erosion control issues (non-construction). Included in this report are the Summary of Commercial Construction Site Inspections, Summary of Residential Construction Site Inspections, Summary of Sediment and Erosion Control Issues (non-construction) Inspections, and “Success Photos” of various locations and issues. (see Document Set 10) **Completed**

Strategy No. 5 (BMP Training Program)

The following is the assessment of this Strategy:

- A) The City relies on one employee (Mark Stephens, BSCE, CPESC – Planning, Development & Stormwater Director), who is qualified by the ADEM to conduct construction site inspections and BMP Plan reviews. Mark is a Certified Professional in Erosion and Sediment Control (CPESC #5132). He holds a Bachelor’s Degree in Civil Engineering and has over 28 years of experience in the civil engineering and stormwater related field. Mark received training during the reporting period in order to maintain his CPESC designation and to stay informed on Best Management Practices and stormwater related issues. Included in this report are his qualifications and certifications. (see Document Set 15) **Completed**

Strategy No. 6 (Notifying ADEM of Non-Compliant Construction Sites)

The following is the assessment of this Strategy:

- A) The City will notify the ADEM (Birmingham Field Office) by telephone and/or email of any non-compliant construction sites. There were 0 non-compliant construction sites reported to the ADEM. There were 19 non-compliant construction sites investigated by the City. **Completed**

**NOTE: The ADEM performed a Phase II MS4 Audit on February 19, 2019. As a result of the audit, the ADEM issued a Notice of Violation (NOV) on March 29, 2019. Violation No.3 was due to the City not notifying the ADEM of those qualifying construction sites that didn’t obtain an ADEM NPDES Construction General Permit. The City provided ADEM with a written reply to the NOV on April 25, 2019. Included in this report are the various documents pertaining to the ADEM Audit, ADEM NOV and the City’s Written Reply to the NOV. (see Appendix D)**

### Strategy No. 7 (Reporting and Tracking System for Complaints)

The following is the assessment of this Strategy:

- A) The City provided a reporting and tracking system for the public regarding erosion and sedimentation from construction sites, impaired waterways, and violations of ordinances relating to stormwater pollution. There were 0 citizen complaints received. Included in this report are the sample Complaint Form (see Document Set 11) and a screen-shot of the City's website showing stormwater contact information for the public to report complaints and violations. (see Document Set 1) **Completed**

## **5.3 Summary of Stormwater Controls for the Next Reporting Period**

The following Stormwater Controls (Strategies) are planned/scheduled for the next reporting period as part of the Construction Site Stormwater Run-Off Control Program. **The proposed efforts indicated in the Evaluation Criteria for each Strategy in Section 5.1 of this report will remain the same for the next reporting period.**

Strategy No. 1 – (Stormwater Run-Off Management Ordinance)

Strategy No. 2 – (Require Qualifying Sites to Obtain an ADEM NPDES Construction General Permit)

Strategy No. 3 – (Construction Site Inspections)

Strategy No. 4 – (Best Management Practices Plan Review)

Strategy No. 5 – (BMP Training Program)

Strategy No. 6 – (Notifying ADEM of Non-Compliant Construction Sites)

Strategy No. 7 – (Reporting and Tracking System for Complaints)

## **5.4 Proposed Modifications**

The City proposes to make the following modification(s) to the Construction Site Stormwater Run-Off Control control measure: **None at this time**

Prior to the City making the above modification(s), the City shall submit the proposed modification(s) to the ADEM for review. Upon completion of the ADEM review, the modification(s) will be made to the SWMP.

## **6. POST-CONSTRUCTION STORM WATER MANAGEMENT IN NEW DEVELOPMENT AND REDEVELOPMENT**

The following section contains: strategies for the minimum control measure, a report on the current reporting period, a summary of stormwater controls for the next reporting period, and proposed modifications to the control measure.

## 6.1 Strategies

The City will implement the following Strategies as part of their Post-Construction Stormwater Management in New Development and Redevelopment Program. To evaluate the success of the program and aid in preparing the Annual Report, evaluation criteria have been established for each strategy.

### **Strategy No. 1. Post-Construction Stormwater Management Ordinance**

The City will implement and enforce the Post-Construction Stormwater Management Ordinance in Section 12-112 of the Code of Ordinances of the City of Jacksonville, Alabama.

A copy of the Post-Construction Stormwater Management Ordinance is located in Appendix D of the SWMP.

**Evaluation Criteria:** The City will evaluate the Post-Construction Stormwater Management Ordinance to ensure that regulations and policies are in place to effectively implement and enforce the requirements of the ADEM NPDES Permit No. ALR040051 to the maximum extent practicable. The annual report will indicate if updates were deemed necessary and will provide supporting documentation that contains the updates. The annual report will also indicate the proposed efforts for the following reporting period.

### **Strategy No. 2. PCSWM Measures**

The City will require that qualifying sites be designed with procedures and strategies that will address and identify the site specific PCSWM measures (structural BMPs, non-structural BMPs, LID, and GIP) to the maximum extent practicable that will remain after construction is completed for the life of the property's use. The stormwater design and management standards for Best Management Practice (BMPs), Low Impact Development (LID) and Green Infrastructure Practices (GIP) were adopted by reference in the Post-Construction Stormwater Management Ordinance. These Standards Include:

- The latest version of the “Alabama Handbook for Erosion Control, Sedimentation Control and Stormwater Management on Construction Sites and Urban Areas”, Volumes 1 and 2.
- The latest version of the “Low Impact Development Handbook for the State of Alabama”.

**Evaluation Criteria:** The City will evaluate the procedures and strategies used for PCSWM measures to ensure that design standards are effective for preventing or minimizing water quality impacts and ensuring that the volume and velocity of pre-construction stormwater is not exceeded during the reporting period. The annual report will indicate the number of sites requiring PCSWM. The annual report will also indicate the proposed efforts for the following reporting period.

**Strategy No. 3. Long-term Operation and Maintenance of PCSWM Measures**

The City will require that qualifying sites be designed with procedures and strategies that will address long-term operation and maintenance of PCSWM measures. One or more of the following shall be applicable (as determined by the City) to establish the responsible party for long-term operation and maintenance:

- The developer's signed statement accepting responsibility for maintenance until the maintenance responsibility is legally transferred to another part.
- Written conditions in the sales or lease agreement that require the recipient to assume responsibility for maintenance.
- Written conditions in project conditions, covenants, and restrictions for residential properties assigning maintenance responsibilities to a home owner's association or other appropriate group for maintenance of structural and treatment control management practices.
- Any other legally enforceable agreement that assigns permanent responsibility for maintenance of structural or treatment control management practices.

**Evaluation Criteria:** The City will evaluate the procedures and strategies used for long-term operation and maintenance of PCSWM measures to ensure that operation and maintenance standards are effective for the life of the property's use during the reporting period. The annual report will indicate if PCSWM measures have been effective. The annual report will also indicate the proposed efforts for the following reporting period.

**Strategy No. 4. PCSWM Measure Inspections**

The City will require that qualifying sites be designed with procedures and strategies that will address inspections (at least once per year) of PCSWM measures. This will include corrective actions to poorly functioning or inadequately maintained PCSWM measures, and record keeping of

maintenance activities, inspections, and corrective actions. These records shall be made available to the ADEM upon request and copies shall be provided to the City on an annual basis or as requested. The City will also perform inspections (at least once per year) in order to verify the records submitted and to confirm that PCSWM measures are functioning as designed.

**Evaluation Criteria:** The City will evaluate the procedures and strategies used for PCSWM measure inspections to ensure that inspection standards are effective, adequately performed, and recorded. The annual report will indicate if inspections of PCSWM measures are being performed. The annual report will also indicate the proposed efforts for the following reporting period.

#### **Strategy No. 5. PCSWM Plan Review**

The City will maintain the requirement to review BMP plans for post-construction stormwater management for qualifying sites. The review will ensure that PCSWM has been addressed as per the requirements detailed in the City's Application for Development Review, located in Appendix E of the SWMP, and the City's Post Construction Stormwater Management Ordinance located in Appendix D of the SWMP.

**Evaluation Criteria:** The City will evaluate the method of reviewing the BMP Plans for PCSWM during the reporting period. The annual report will indicate if BMP plans were reviewed for PCSWM and the number of BMP Plans with PCSWM reviewed. The annual report will also indicate the proposed efforts for the following reporting period.

### **6.2 Report on the Current Reporting Period**

During the current reporting period (April 1, 2018 to March 31, 2019), the City of Jacksonville strived to complete the five (5) Strategies established for the Post-Construction Stormwater Management in New Development and Redevelopment control measure identified in the SWMP.

The following is a narrative report on each Strategy, along with the implementation status (Completed, Not Completed, or In Progress). Supporting documentation is included in **Appendix B** or as otherwise specified.

#### Strategy No. 1 (Post-Construction Stormwater Management Ordinance)

The following is the assessment of this Strategy:

- A) The City evaluated the Post-Construction Stormwater Ordinance (adopted 12-5-16) to ensure that regulations and policies were in place to effectively implement and enforce the requirements of the City's ADEM NPDES Permit No. ALR040051 to the

maximum extent practicable. It was determined that the current Ordinance was adequate and no changes were deemed necessary. **Completed**

Strategy No. 2 (PCSWM Measures)

The following is the assessment of this Strategy:

- A) The City evaluated the procedures and strategies used for the Post-Construction Stormwater Management Measures to ensure that design standards were effective for preventing or minimizing water quality impacts and ensuring that the volume and velocity of pre-construction stormwater is not exceeded. There was 1 project that applied for Development Review (Subdivision Review) during the current reporting period that required PCSWM Measures. However, there was no construction activity during this reporting period. It was determined that the design standards to be used for PCSWM Measures have not been tested in order to assess their effectiveness. Therefore, no changes were deemed necessary. **Completed**

Strategy No. 3 (Long-Term Operation and Maintenance of PCSWM Measures)

The following is the assessment of this Strategy:

- A) The City evaluated the procedures and strategies used for long-term operation and maintenance of PCSWM Measures to ensure that operation and maintenance standards were effective for the life of the property's use. There was 1 project that applied for Development Review (Subdivision Review) during the current reporting period that required Long-Term Operation and Maintenance of PCSWM Measures. However, there was no construction activity during this reporting period. It was determined that the long-term operation and maintenance to be used for PCSWM Measures have not been tested in order to assess their effectiveness. Therefore, no changes were deemed necessary. **Completed**

Strategy No. 4 (PCSWM Measure Inspections)

The following is the assessment of this Strategy:

- A) The City evaluated the procedures and strategies used for PCSWM Measure Inspections to ensure that inspection standards were effective, adequately performed, and recorded. There was 1 project that applied for Development Review (Subdivision Review) during the current reporting period that required PCSWM Measure Inspections. However, there was no construction activity during this reporting period. It was determined that the procedures and strategies to be used for PCSWM Measure Inspections have not been tested in order to assess their effectiveness. Therefore, no changes were deemed necessary. **Completed**

Strategy No. 5 (PCSWM Plan Review)

The following is the assessment of this Strategy:

- A) The City evaluated the methods used to review qualifying site's BMP Plans for PCSWM. There were 1 qualifying sites that applied for Development Review

(Subdivision Review) during the current reporting period that required PCSWM. However, there was no construction activity during this reporting period. It was determined that the methods to be used for PCSWM Plan Review have not been tested in order to assess their effectiveness. Therefore, no changes were deemed necessary. **Completed**

### 6.3 Summary of Stormwater Controls for the Next Reporting Period

The following Stormwater Controls (Strategies) are planned/scheduled for the next reporting period as part of the Post-Construction Stormwater Management in New Development and Redevelopment Program. **The proposed efforts indicated in the Evaluation Criteria for each Strategy in Section 6.1 of this report will remain the same for the next reporting period.**

Strategy No. 1 – (Post-Construction Stormwater Management Ordinance)

Strategy No. 2 – (PCSWM Measures)

Strategy No. 3 – (Long-Term Operation and Maintenance of PCSWM Measures)

Strategy No. 4 – (PCSWM Measure Inspections)

Strategy No. 5 – (PCSWM Plan Review)

### 6.4 Proposed Modifications

The City proposes to make the following modification(s) to the Post-Construction Stormwater Management in New Development and Redevelopment control measure: **None at this time**

Prior to the City making the above modification(s), the City shall submit the proposed modification(s) to the ADEM for review. Upon completion of the ADEM review, the modification(s) will be made to the SWMP.

## 7. POLLUTION PREVENTION / GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

The following section contains: strategies for the minimum control measure, a report on the current reporting period, a summary of stormwater controls for the next reporting period, and proposed modifications to the control measure.

### 7.1 Strategies

The City will implement the following Strategies as part of their Pollution Prevention / Good Housekeeping for Municipal Operations Program. To evaluate the success of the program and aid in preparing the Annual Report, evaluation criteria have been established for each strategy.

**Strategy No. 1. Best Management Practices and Inspection Checklists Document**

The City provides a guidance document for pollution prevention and good housekeeping for municipal operations to all departments within the city in order to establish best management practices that will effectively reduce the impacts of municipal operations on stormwater quality. A copy of the guidance document is located in Appendix E of the SWMP.

**Evaluation Criteria:** The City will evaluate the procedures and checklists contained in the guidance document to ensure that it adequately provides knowledge and awareness of Best Management Practices for municipal operations during the reporting period. The annual report will indicate which departments have the guidance document. The annual report will also indicate the proposed efforts for the following reporting period.

**Strategy No. 2. Municipal Training**

In connection with the training of municipal employees detailed in Section 4.8, municipal employees will be trained on pollution prevention and good housekeeping for municipal operations. Training will focus on the following topics, landscaping and lawn care, spill response and prevention, pest control, pet waste collection, septic system management, vehicle/equipment maintenance, vehicle/equipment washing, roadway and bridge maintenance, alternative discharge options for chlorinated water, hazardous waste material management, operational by products/wastes, catch basin and storm drain system cleaning, street cleaning and maintenance, road kill composting operations, and construction and land disturbance. Educational materials will be distributed to the department and videos may also be utilized for training.

**Evaluation Criteria:** The City will evaluate the methods and topics used for municipal training to ensure the municipal employees' knowledge and awareness of stormwater pollution issues during the reporting period. The annual report will indicate if training was performed and will provide supporting documentation containing methods/topics of training and attendance logs. The annual report will also indicate the proposed efforts for the following reporting period.

**Strategy No. 3. Vehicle and Equipment Maintenance Program**

The City owns and operates a variety of vehicles and equipment used in municipal operations. The City will maintain procedures to conduct routine maintenance inspections of owned vehicles and equipment and will inspect vehicles and equipment for the presence of fluid leaks during routine maintenance. The City will maintain an inspection log for each vehicle or equipment to document identified problems. The City will promptly repair

vehicles and equipment determined to have leaks. Vehicle and equipment washing will be performed only in designated areas.

**Evaluation Criteria:** The City will evaluate the procedures for conducting routine maintenance inspections and maintaining inspection logs during the reporting period. The annual report will indicate the number of vehicle/equipment inspections performed by each department and will include supporting documentation containing the inspection logs. The annual report will also indicate the proposed efforts for the following reporting period.

#### **Strategy No. 4. Pesticide Applications**

The City currently uses various products (pesticides, insecticides, and herbicides) to control insects, pests, and unwanted vegetation. To ensure that applications of these products do not contribute to negative water quality, municipal employees/departments will have current certifications and city personnel will review all areas where products are to be used in order to reduce potential negative impacts to waterways. The City will comply with all applicable product application and disposal regulations.

**Evaluation Criteria:** The City will evaluate the procedures used for the application of pesticides, insecticides, and herbicides to ensure the application does not contribute to negative water quality, will verify that all applicable application and disposal regulations are followed, and will verify that municipal employees/departments maintain current applicator certifications during the reporting period. The annual report will indicate which municipal employees/departments have the current applicator certifications and will include supporting documentation containing a copy of the current certifications. The annual report will also indicate the proposed efforts for the following reporting period.

#### **Strategy No. 5. Street Sweeping Program**

The City maintains a street sweeping program that is an effective method of removing sediment and pollutants from roadways in order to reduce negative water quality impacts on waterways. The City currently performs street sweeping of primary and secondary streets.

**Evaluation Criteria:** The City will evaluate the procedures for the street sweeping program and prioritize streets to be swept based upon debris accumulation and citizen complaints during the reporting period. The annual report will indicate the approximate number of streets swept each month and the approximate annual tonnage of debris collected from street sweeping. The annual report will also indicate the proposed efforts for the following reporting period.

**Strategy No. 6. Leaf Collection / Trash and Brush Pickup Program**

The City maintains a leaf, trash, grass, and brush collection program that is an effective method of removing materials from the right-of-way of roadways in order to reduce negative impacts on waterways and reduce the potential of clogging storm sewer inlets and pipes. The collection program operates year round. Detailed information about the program can be found on the City's website ([www.jacksonville-al.org](http://www.jacksonville-al.org)) under the Community Life tab (Garbage, Recycling & Trash Pick-up).

**Evaluation Criteria:** The City will evaluate the procedures for the leaf, trash, grass, and brush collection program to ensure these materials are removed from the right-of-way during the reporting period. The annual report will indicate the approximate annual tonnage of material collected from rights-of-way and will provide supporting documentation that contains the program information from the City's website. The annual report will also indicate the proposed efforts for the following reporting period.

**Strategy No. 7. Outreach to Others**

The City will reach out to other MS4 municipalities and stormwater related groups to discuss programs, obstacles, and successes involving the ADEM NPDES permitting requirement.

**Evaluation Criteria:** The City will evaluate the need to reach out to others in order to assess the effectiveness of the City's SWMP Program. The annual report will indicate which municipalities and stormwater related groups the City reached out to or met with and will provide supporting documentation containing dates and participants. The annual report will also indicate the proposed efforts for the following reporting period.

## 7.2 Report on the Current Reporting Period

During the current reporting period (April 1, 2018 to March 31, 2019), the City of Jacksonville strived to complete the seven (7) Strategies established for the Pollution Prevention / Good Housekeeping for Municipal Operations control measure identified in the SWMP.

The following is a narrative report on each Strategy, along with the implementation status (Completed, Not Completed, or In Progress). Supporting documentation is included in **Appendix B** or as otherwise specified.

Strategy No. 1 (Best Management Practices and Inspection Checklists Document)

The following is the assessment of this Strategy:

- A) The City evaluated the procedures and checklists contained in the guidance document to ensure that it adequately provided knowledge and awareness of Best Management

Practices for municipal operations. The City departments that have this guidance document are: Planning and Building, Fire, Police, Street and Sanitation, Parks and Recreation, City Hall, and Water Works, Gas and Sewer Board. **Completed**

Strategy No. 2 (Municipal Training)

The following is the assessment of this Strategy:

- A) The City conducted training for the municipal employees in various departments. Training in regard to “Stop Pointless Personal Pollution” was provided on January 9, 2019 to employees at the City Hall, Utility Board Office, Utility Board Maintenance Shop, Waste Water Treatment Plant, Public Library, Street Department, Fire Department, Police Department, and Parks and Recreation Department. Additional training in regard to a variety of stormwater related topics was provided to the Street and Sanitation Department at their monthly safety meetings. Included in this report are the training topics and attendance logs. (see Document Set 16) **Completed**

Strategy No. 3 (Vehicle and Equipment Maintenance Program)

The following is the assessment of this Strategy:

- A) The City evaluated the procedures for conducting routine maintenance inspections and maintaining inspection logs. The following indicates the number of vehicle/equipment inspections performed by each City department: 12 - Planning and Building, 0 - Fire, 0 - Police, 132 – Street and Sanitation, 0 - Parks and Recreation, 12 – City Hall, 0 - Water Works, Gas and Sewer Board. Included in this report are the inspection logs. (see Document Set 12) **Not Completed**

Strategy No. 4 (Pesticide Applications)

The following is the assessment of this Strategy:

- A) The City evaluated the procedures used for the application of pesticides, insecticides, and herbicides to ensure the application did not contribute to negative water quality, verified that application and disposal regulations were followed, and verified that municipal employees/departments maintained any required applicator certifications. The Street and Sanitation Department and the Parks and Recreation Department are responsible for the application of pesticides, insecticides, and herbicides. Each department followed the product manufacturer’s directions for the application and disposal. It is understood that the Department of Agriculture does not require Cities to have applicator certifications as long as the product manufacturer’s directions are followed. **Completed**

Strategy No. 5 (Street Sweeping Program)

The following is the assessment of this Strategy:

- A) The City evaluated the procedures for the Street Sweeping Program which includes prioritizing streets to be swept based upon debris accumulation and citizen complaints. The City actually sweeps all City streets monthly. The approximate

annual tonnage of debris collected was not available. However, there was an average of approximately 30 cubic yards per day collected. **Completed**

Strategy No. 6 – (Leaf Collection / Trash and Brush Pickup Program)

The following is the assessment of this Strategy:

- A) The City evaluated the procedures for the Leaf Collection / Trash and Brush Pickup Program to ensure these materials are removed from the rights-of-way. The approximate annual tonnage of materials collected was not available. However, there was an average of approximately 200 cubic yards per day collected. Included in this report is a screen-shot of the City’s website showing the garbage, recycling and trash pick-up information, and collection information. (see Document Set 4) **Completed**

Strategy No. 7 – (Outreach to Others)

The following is the assessment of this Strategy:

- A) The City evaluated the need to reach out to others (municipalities and stormwater related groups) in order to assess the effectiveness of the City’s SWMP Program. It was determined that there is and will always be a need to reach out to others. This outreach provided the opportunity to discuss and compare stormwater issues (strategies, challenges and successes) that others had in order to help in evaluating the City’s SWMP Program. The municipalities reached out to by telephone were: Gadsden, Anniston, and Calhoun County. The stormwater related groups reached out to at meetings or by joining were: Calhoun County Stormwater Cooperative, Alabama Clean Water Partnership, Soil and Water Conservation Society, and Create a Clean Water Future Campaign. Included in this report is information regarding outreach to others. (see Document Set 13) **Completed**

### **7.3 Summary of Stormwater Controls for the Next Reporting Period**

The following Stormwater Controls (Strategies) are planned/scheduled for the next reporting period as part of the Pollution Prevention / Good Housekeeping for Municipal Operations Program. **The proposed efforts indicated in the Evaluation Criteria for each Strategy in Section 7.1 of this report will remain the same for the next reporting period.**

- Strategy No. 1 – (Best Management Practices and Inspection Checklists Document)
- Strategy No. 2 – (Municipal Training)
- Strategy No. 3 – (Vehicle and Equipment Maintenance Program)
- Strategy No. 4 – (Pesticide Applications)
- Strategy No. 5 – (Street Sweeping Program)
- Strategy No. 6 – (Leaf Collection / Trash and Brush Pickup Program)
- Strategy No. 7 – (Outreach to Others)

## 7.4 Proposed Modifications

The City proposes to make the following modification(s) to the Pollution Prevention / Good Housekeeping for Municipal Operations control measure: **None at this time**

Prior to the City making the above modification(s), the City shall submit the proposed modification(s) to the ADEM for review. Upon completion of the ADEM review, the modification(s) will be made to the SWMP.

## 8. OVERALL EVALUATION OF THE STORMWATER MANAGEMENT PROGRAM

The following section contains: major accomplishments, overall program strengths/weaknesses, future direction of the program, overall determination of the effectiveness of the program, measurable goals that were not performed and reasons why goals were not accomplished, and monitoring data (if required) for the Stormwater Management Program.

### 8.1 Major Accomplishments

The Stormwater Management Program had the following major accomplishments:

- A) Most all SWMP control measure strategies were completed, except those listed in Section 8.5.
- B) The communication and participation from contractors working within the City's MS4 Boundary in regard to BMP implementation continues to improve.
- C) Municipal employees are continuing to be trained and educated on the SWMP and IDDE Program.
- D) Additional stormwater related information was added to the City's website.
- E) Additional stormwater related educational materials were distributed.
- F) There are approximately 23 miles of streams within the City Limits, of which approximately 19 miles are within the City's MS4 Boundary (including across Jacksonville State University property). The City walked all 19 miles of streams during the previous reporting periods. The City has started the stream walking cycle over again by walking 6 miles during this reporting period. This meets the required average of one-half mile per month.

### 8.2 Overall Program Strengths / Weaknesses

The Stormwater Management Program had the following strengths:

- A) Increased public education efforts on stormwater related issues.

- B) Increased understanding of the SWMP's intent and requirements by City officials, municipal employees, general public, businesses, and contractors.

The Stormwater Management Program had the following weaknesses:

- A) The City has only one staff member that is responsible for the coordination and implementation of all components of the SWMP in addition to their other duties.
- B) There is no dedicated funding source, such as a Stormwater User Fee, in place to allow the City to commit to additional initiatives such as expanding public education and water quality/quantity capital improvements.
- C) Those violations as described in the ADEM NOV letter (March 29, 2019). (see Appendix D)

### **8.3 Future Direction of the Program**

The future direction of the Stormwater Management Program is:

- A) To continue the implementation of the SWMP in order to meet the requirements of the City's ADEM NPDES Permit No. ALR040051.
- B) To evaluate the SWMP as needed and make modifications as deemed necessary.
- C) To correct the ADEM NOV violations (March 29, 2019) as described in the City's Written Reply letter (April 25, 2019). (see Appendix D)

### **8.4 Overall Determination of the Effectiveness of the SWMP**

The overall determination of the effectiveness of the SWMP is based on the fact that:

- A) The City complied with the ADEM NPDES Permit No. ALR040051 requirements, except as described in the ADEM NOV letter (March 29, 2019). (see Appendix D)
- B) There were continued changes in the attitudes, knowledge, and awareness of the general public, businesses and contractors in regard to stormwater related issues.
- C) There were continued changes in the behavior of the contractors working within the City's MS4 Boundary in regard to BMP implementation on their construction sites.
- D) Due to the above facts (A-C), the water quality within the City's MS4 Boundary has improved. Thus, improving the water quality of the receiving waters downstream.

### **8.5 Measurable Goals That Were Not Performed and Reasons Why Goals Were Not Accomplished**

The measurable goals that were not performed and the reason why are:

- A) The City did not install signs at select locations that referenced local and state codes that prohibit littering and illegal dumping as stated in Section 3.1 (Strategy No. 2). Reason: This is planned for the future.

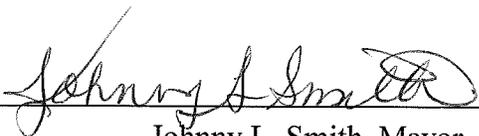
- B) The City did not update the Storm Sewer GIS Map to include existing features as stated in Section 4.1 (Strategy No. 9).  
Reason: This is planned for the future.
- C) The City did not update the Storm Sewer GIS Map to include new additions as stated in Section 4.1 (Strategy No. 10).  
Reason: This is planned for the future.
- D) All City departments did not perform vehicle and equipment inspections as stated in Section 7.1 (Strategy No. 3).  
Reason: Lack of communication stressing the importance and necessity.
- E) Violation of those strategies as described in the ADEM NOV letter (March 29, 2019).  
Reason: As described in the City's Written Reply letter (April 25, 2019).  
(see Appendix D)

**8.6 If Monitoring is Required, Evaluation of the Monitoring Data**

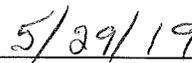
There was no monitoring required or deemed necessary.

**8. AGENCY CERTIFICATION**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



Johnny L. Smith, Mayor  
City of Jacksonville, Alabama



Date