
City of Prattville

101 West Main Street
Prattville, Alabama 36067



Municipal Separate Storm Sewer System (MS4) 2018 Annual Report

NPDES Permit No. ALS000010

January 2018

Prepared By:



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



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	○ Be Septic Smart EPA Booklet
	○ Prattville Stormwater Requirements for Construction
	○ Construction Site BMP EPA Poster
	○ Wendell and Penelope Learn About Storm Water Coloring Book



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SECTION 1

General Information



1. General Information

1.1. Signatory Requirements

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

Bill Gillespie, Jr. _____
Name

Mayor _____
Title

 _____
Signature

1-24-2019 _____
Date

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



1.2. List of Contacts

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

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

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Any questions concerning the City of Prattville's (City) Municipal Separate Storm Sewer System (MS4) 2018 Annual Report shall be directed to Mr. Jonathan Larkin.

1.3. Overview and Summary

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



In 1999, EPA promulgated regulations establishing Phase II of the NPDES storm water program. The Phase II program extends coverage of the NPDES storm water program to regulated “small” MS4s. A regulated “small” MS4 is defined as a MS4 located within an “urbanized area,” as defined by the Census Bureau or as designated by the NPDES permitting authority.

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

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

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

This annual report summarizes the City’s efforts for the reporting period from 1 October 2017 through 30 September 2018 to comply with the NPDES Permit and the above listed five program elements to the maximum extent practicable.

1.4. MS4 Area

The City of Prattville is located in the central part of the state along the Alabama River in Autauga and Elmore Counties. The City occupies approximately 34.25 square miles and is bordered on the east by the City of Millbrook. Approximately 17.79 square miles (51.9%) of the City is located within Montgomery, Alabama Urbanized Area as defined by 2010 Census. Areas of the City located within the Urbanized Area are the City’s regulated MS4 area.

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

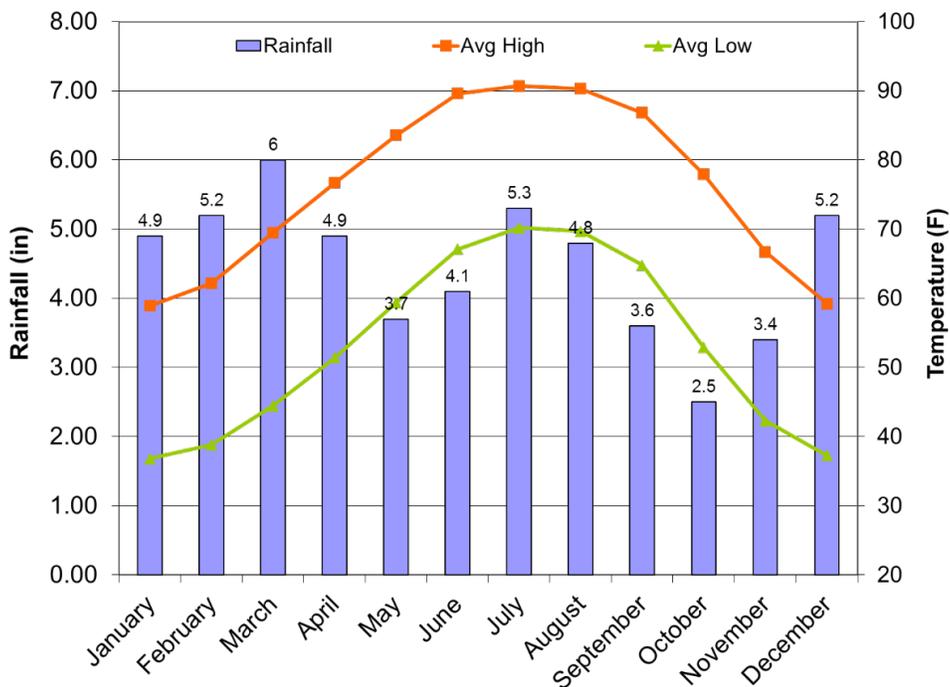


The City's corporate limits, MS4 Area, Autauga and Elmore City boundaries, major roads, major streams, and surrounding communities are presented in Figure 1.2.

1.4.1. Climate

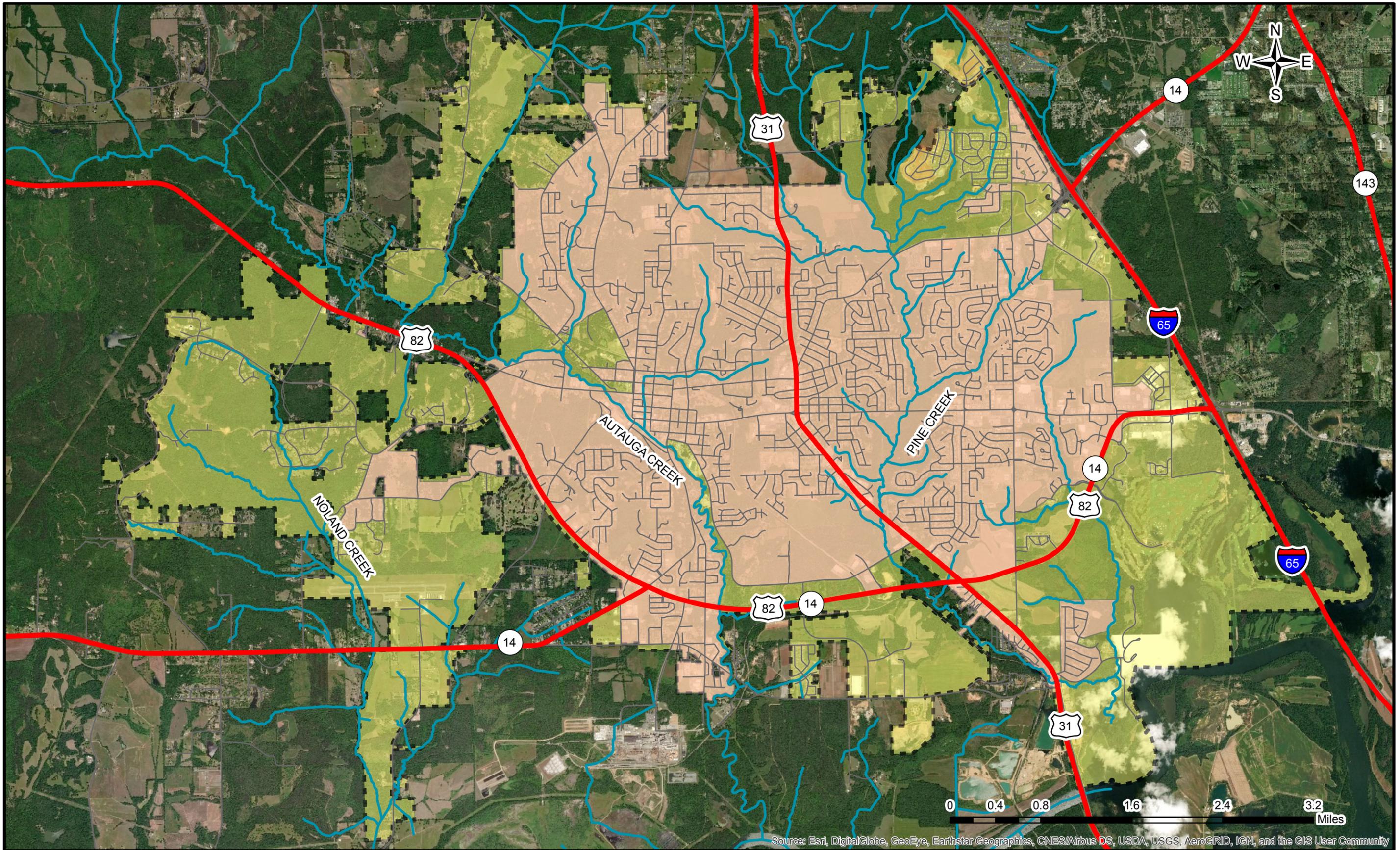
The City has a humid subtropical climate, with short mild winters, warm springs and autumns, and long hot humid summers. Winter temperatures average 47.9°F in January with lows rarely dipping below 20°F. Summer temperatures average 80.4°F in July with highs exceeding 90°F for more than 72 days per year.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

Figure 1.1 Average Rainfall and Temperatures



1.4.2. Population

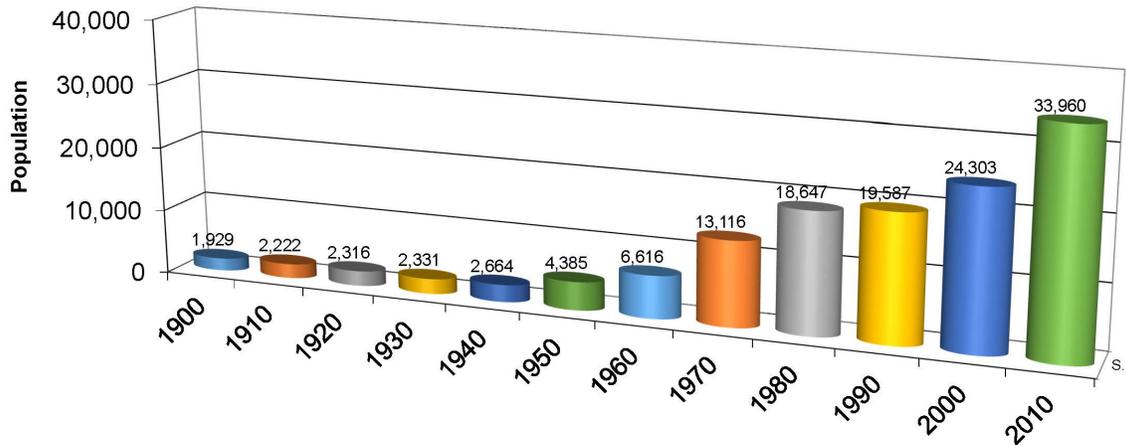
Since the City was incorporated in 1839, the City experienced a small increase in population until 1960. From 1960 to 2010, the City experienced a significant population growth. Figure 1.3 provides a graph showing the historical population of the City since 1900.





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

Figure 1.3 Historical Population



1.4.3. Land Use

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

Table 1.1 Zoning Districts

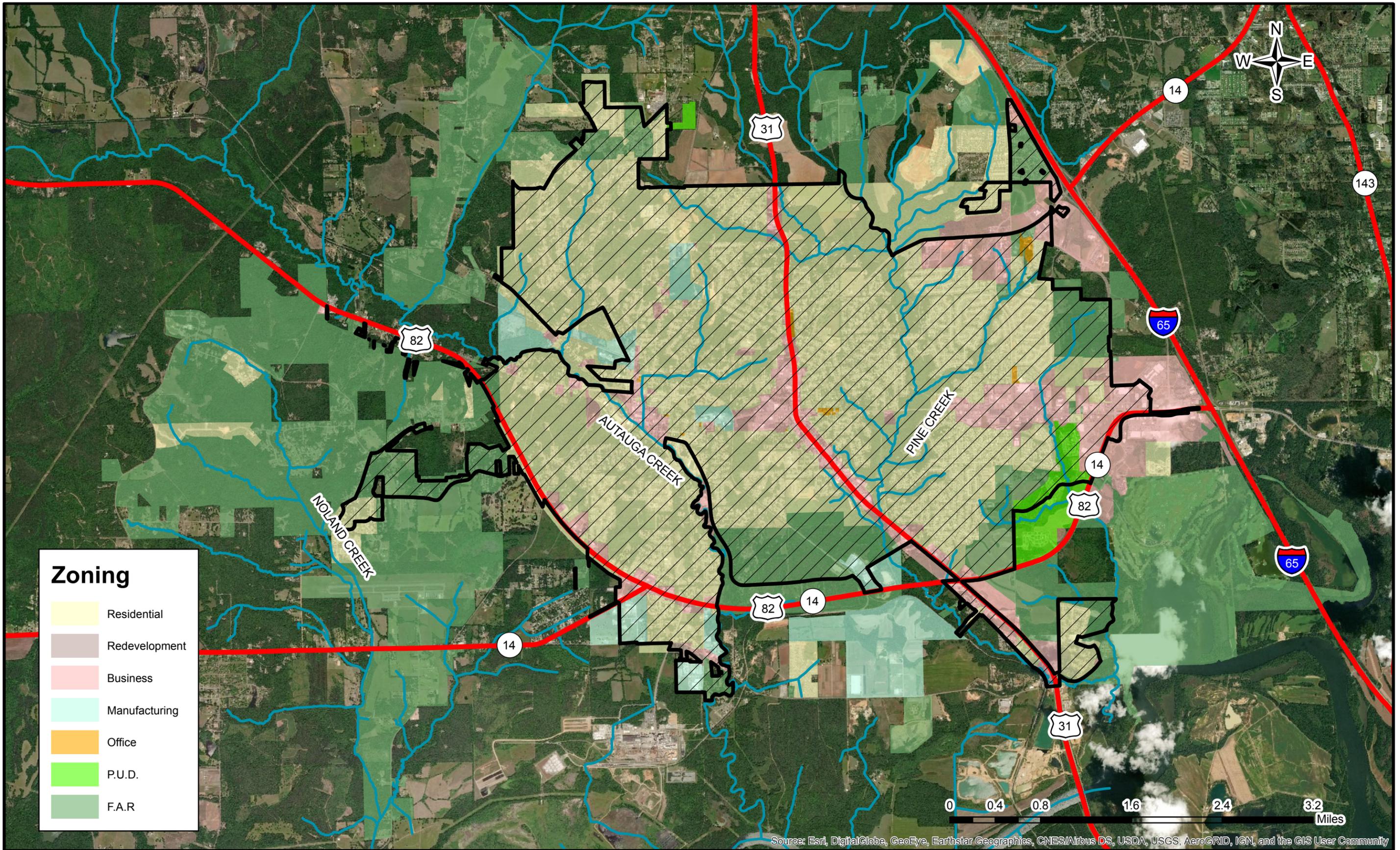
District	City		MS4 Area	
	Area (mi ²)	Area (%)	Area (mi ²)	Area (%)
Residential	14.695	42.5	12.615	70.9
Redevelopment	0.028	0.1	0.022	0.1
Business	3.501	10.1	2.199	12.4
Manufacturing	1.566	4.5	0.465	2.6
Office	0.059	0.2	0.058	0.3
Planned Unit Development	0.483	1.4	0.170	1.0
Agriculture	14.271	41.2	2.251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



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

1.5. Known Problems

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



Zoning

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

- Prattville MS4 Area
- Streets
- ALDOT Roads
- Streams



CITY OF PRATTVILLE
Land Use Summary

Figure 1.4
September 2018



SECTION 2

Program Evaluation



2. Program Evaluation

2.1. Program Objectives

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

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

2.2. Public Education

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

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

As the public gains a greater understanding of the benefits of a stormwater program, the City is likely to gain more support for the SWMP and increased compliance with the NPDES permit requirements. Public education and public involvement provides a mechanism to help the public understand how their actions can potentially impact stormwater quality. Public participation can also help reduce the amount of pollution generated and identify potential pollution-causing activities and/or sources.

The City has utilized a variety of techniques to inform its citizens about activities that are occurring throughout the City as well as provide information to help educate the local community on how to protect water resources. Some of the mechanisms the City utilizes are summarized in the following sections.



2.2.1. Local Partnerships

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

Autauga Creek Improvement Committee (ACIC)

www.autaugacreek.org

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

Alabama Cooperative Extension System (ACES)

www.offices.aces.edu/autauga/

- The City provided Pratt Park for the Annual Kid's Fishing Rodeo; and,
- Water Festival organization.

Alabama Soil and Water Conservation Committee (ASWCC)

www.alconsevationdistricts.gov

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

ADEM

www.adem.state.al.us

- Coordinate on non-storm water discharge investigations.

The City's contribution to the above referenced organizations may include but is not limited to staff participation, financial contributions, land contributions, and/or technical assistance. Additional educational activities performed by each entity are further documented on their websites. The Autauga County Cooperative Extension System's Winter and Summer 2018 Newsletters document their associated events and are included in Appendix A.

2.2.2. Website

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

- Storm Water Management Program
 - NPDES Permit ALS000010



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

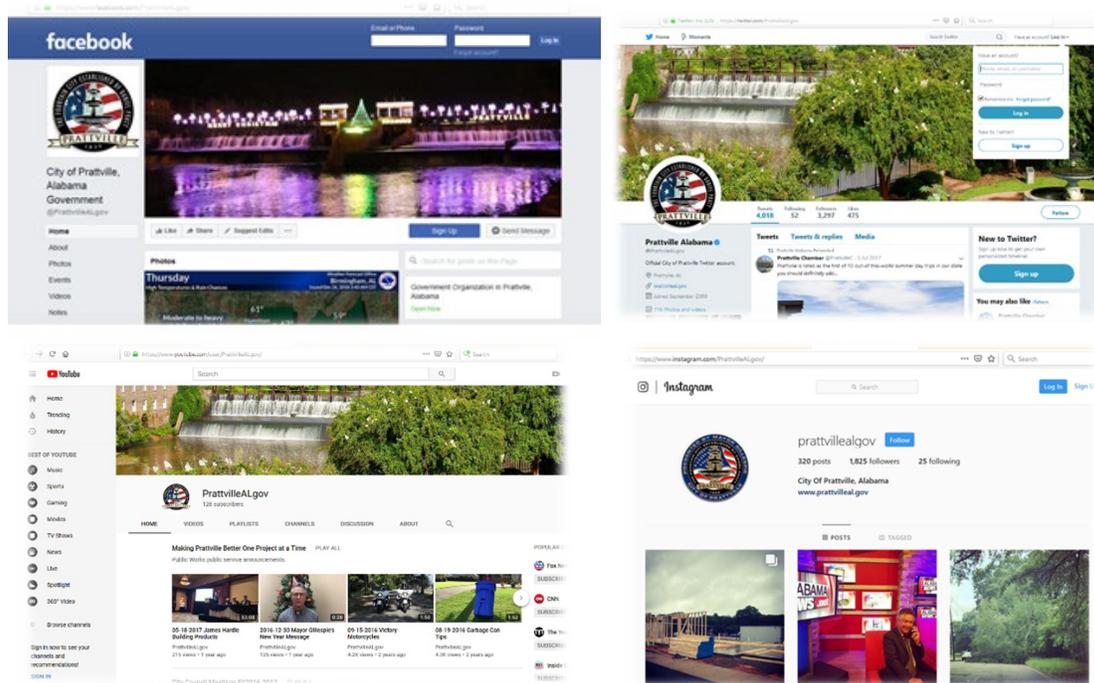
Through the website, citizens are provided access to the City’s regulations, ordinances, permitting requirements, and a variety of other information. The website is maintained and updated on an as needed basis. Screen shots of selected pages are included in Appendix A.

2.2.3. Social Media

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



Figure 2.1 City Social Media Pages



The City currently maintains the following social media platforms.

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

- 21,649 Followers
- 22,156 “Likes”

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

- 3,297 Followers
- 4,018 Tweets

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

- 126 Subscribers
- 56,518 Views since 24 September 2009

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

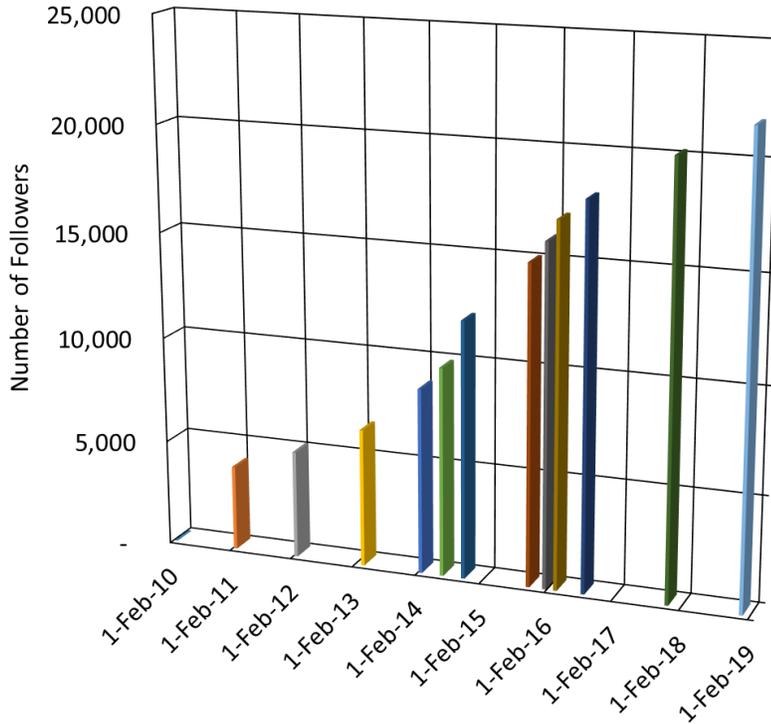
- 1,825 Followers
- 320 Posts

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



residents seek up-to-date alerts, timely information, and deeper understanding of City services.

Figure 2.2 Facebook Followers



2.2.4. Public Service Announcements

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

- Litter PSAs – Four videos with various volunteer organizations, Public Works Department employees, Mayor Gillespie, and other residents removing litter from public areas. The videos encourage residents not to litter and “Do Your Part” to remove existing litter. Residents are encouraged to use the “hashtag” phrase #WHYlitter. The YouTube feeds are available at:
 - https://www.youtube.com/watch?v=sYA-jMG_1c
 - <https://www.youtube.com/watch?v=ct5bOi3tRCY>



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

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

2.2.5. Brochures

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

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

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

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



Table 2.1 Brochures

Description	Target Pollution Source	Target Audience	Distribution
Brochures			
Storm Drain Stewardship	General Information	Homeowners Renters Schools Business Owners Contractors Professionals Developers	Website
Fact Sheets			
Protecting Water Quality from Urban Runoff	General Information	Homeowners Renters Schools Business Owners Contractors Professionals Developers	Website
Booklets			
Down Stream – A Guide for Preventing Urban Runoff and Stormwater Pollution	General Information	Homeowners Renters Schools Business Owners	Website
Do Your Part – Be Septic Smart	Septic System Management	Homeowners Renters Business Owners	Website
Stormwater Requirements for Construction	Construction Site Permitting Informational Links	Contractors Professionals Developers	Website 237 distributed with building permits
Wendell and Penelope Learn About Stormwater	General information Coloring Book	Children	300 distributed at CityFest
Posters			
Stormwater and the Construction Industry	Construction Site Runoff ESC Plans BMP Maintenance	Contractors Professionals Developers	Website

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

- Environmental Protection Agency (EPA);
- Erie County, New York;
- City of Bryan, Texas; and,



- Mid-America Regional Council (MARC).

The City distributed 300 gift bags with copies of the “Wendell and Penelope Learn About Stormwater” coloring book at CityFest in downtown Prattville on 11 and 12 May 2018. Prior to 1 July 2018, the City had distributed 636 copies of the “Stormwater Requirements for Construction” to every person obtaining a building permit. After 1 July 2018, the City’s Erosion and Sediment Control Ordinance became effective and the Grading Permit Packet was available for informational purposes. These items are discussed in Section 2.5.

2.2.6. Workshops

During the permit year, the City hosted two workshops concerning the adoption of the new Erosion and Sediment Control ordinance and Post Construction Storm Water Runoff ordinance. These workshops targeted contractors, developers, engineers, and other professionals involved in development planning, design, and construction.

- On 21 June 2018, the City hosted a workshop at the Doster Center focusing on the newly adopted Erosion and Sediment Control Ordinance. The City gave a presentation discussing permit requirements, ordinance contents, and new and updated permitting forms and submittals. There were approximately 30 attendees, but only 18 signed the attendance sheet.
- On 18 September 2018, the City co-hosted a “Lunch and Learn” workshop with the City of Montgomery on Post Construction Storm Water Management requirements for the two cities. The cities discussed permit requirements, the updated Technical Memorandum and forms, and Prattville’s recently adopted ordinance. Also, vendors with related products were allowed to give presentations and discuss how their products could help developers meet the new requirements. There were 35 attendees and three vendors at the event.

Pictures from the workshops are shown in Figure 2.3. A copy of the presentations and attendee lists are provided in Appendix A.

2.2.7. Training

On 26 June 2018, the City’s Storm Water Coordinator gave a presentation to 89 City employees from the Public Works Department about the City’s MS4 program. The presentation included examples of issues the City has encountered and abated including illicit discharges and connections, construction site runoff, food

service issues, and litter problems. A copy of the presentation and Employee training sign-in sheet is provided in Appendix E.

Figure 2.3 Workshops



Erosion and Sediment Control Workshop



Post Construction Storm Water Management Workshop

2.3. Public Involvement

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

2.3.1. Public Reporting

The City has implemented a citizen reporting tool for the general public to provide suggestions and/or to report incidents that may potentially impact the MS4. A citizen can report an issue of concern, nuisance, or request maintenance by



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

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

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

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

2.3.2. Autauga Creek Improvement Committee (ACIC)

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

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

In the past couple of years, ACIC has not only secured a spot for Autauga Creek on the Alabama Scenic River Trail but also acquired the designation as a National Recreational Trail. Signs have been posted along the 14 mile blueway trail to help provide visitors with information about the trail. The sign installed as Doster Well Park and a map of the four mile section of the blueway trail are provided in Figure 2.4. ACIC provides educational opportunities and materials as well as supports cleanup activities along the blueway trail. Information about ACIC is provided at

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

Figure 2.4 Autauga Creek Blueway Trail



2.3.3. Autauga County Water Festival

Autauga County Water Festival is open to all fourth-grade students in Autauga County, including all public, private, and home school students. The festival is designed to be a fun, educational and memorable event in a field day atmosphere. The purpose of this event is to educate children about all aspects of water and other related natural resources through interactive hands-on activities. The goal of the festival is to instill in each student a general environmental awareness and stewardship ethic. The City is not only a sponsor of the festival but also provides volunteers that help organize and host the festival. This year's festival was held on 10 May 2018 and had over 600 students in attendance. Photos from the event are included in Figure 2.5.

Figure 2.5 Autauga County Water Festival



2.3.4. Recycling

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

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

The City operates a drop off location for recyclables in the parking lot of Overlook Park located at 299 Jay Street. The drop-off location has bins for aluminum, plastics, paper, cardboard, and steel or tin cans. Pictures of the Recycling Center and drop-off location are provided in Figure 2.6. Recycling totals for a portion of the permit year are provided in Appendix A.

Figure 2.6 Recycling Locations



Prattville Recycling Center



Overlook Park

2.3.5. Pet Waste Stations

The City has seven pet waste disposal stations at various locations in Prattville parks and public areas. These stations are regularly maintained including emptying, refilling bags, and general maintenance. The City typically purchases 3,000 bags each permit year. A photograph of the pet waste disposal system installed at Pratt Park is provided in Figure 2.7.

Figure 2.7 Pet Waste Disposal Station



2.3.6. Autauga PALS Cleanups

The City and the Autauga County Commission occasionally have citizens performing mandated community service within the City. This service includes litter cleanups associated with People Against a Littered State (PALS). During the permit year, 56 miles of roadway within the City were cleaned by citizens performing 167 hours of community service. Roadways included:

- Lower Kingston Road;
- Martin Luther King Jr. Drive;
- Doster Road;
- Washington Ferry Road;
- Chesnut Street;
- County Road 4;
- Highway 82 Bypass; and,
- Highway 31 South.

A summary of community service roadside cleanups provided by Autauga PALS is included in Appendix A.



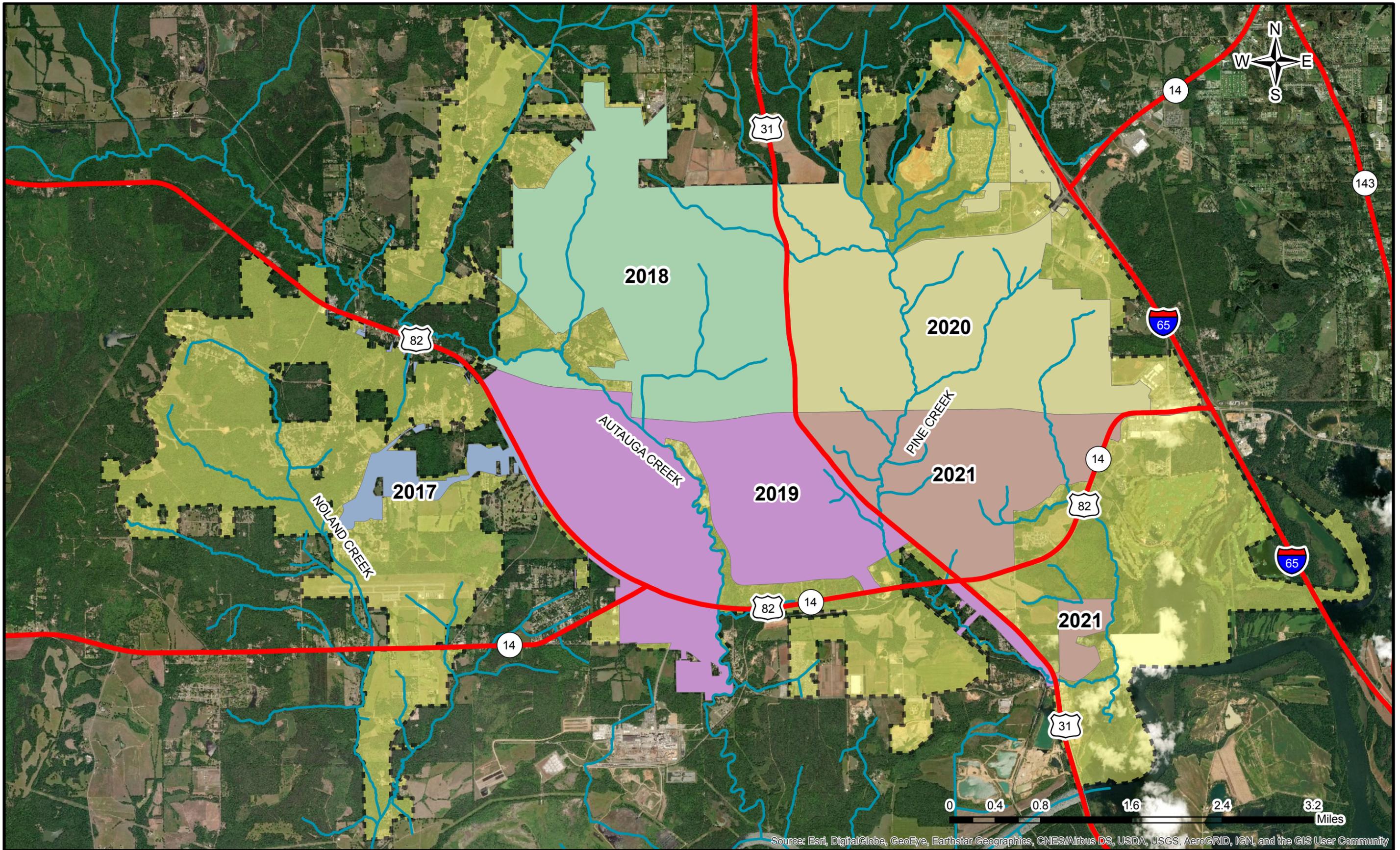
2.4. Illicit Discharge and Improper Disposal

The City is continuously implementing an Illicit Discharge Detection and Elimination (IDDE) Program in accordance with the SWMP Plan. The City has been divided into five areas to map and screen outfalls during within a five year period. Boundaries of each area are shown in Figure 2.8.

2.4.1. Legal Authority

On 15 May 2018, the City of Prattville adopted an Illicit Detection and Elimination (IDDE) Ordinance (Ordinance No. 2018-007). A copy of the IDDE ordinance is provided in Appendix B. The IDDE ordinance establishes the legal authority for the City to prohibit, monitor, and eliminate illicit discharges and/or illicit connections to the City's MS4. Components of the IDDE ordinance are described below:

- Administration: The IDDE Program shall be administered and implemented by the Public Works Director.
- Prohibition of Illicit Discharges and Illicit Connections: Prohibits the discharge of pollutants or waters containing pollutants into the City's MS4. The IDDE ordinance provides a list of activities that are not considered to be a source of pollution that includes but are not limited to water line flushing, air conditioning drains, dechlorinated swimming pools, dye testing, etc.
- Watercourse Protection: No person owning a premises or leasing a premises through which a watercourse passes shall throw, deposit, leave, maintain, keep, or permit to be thrown, deposited, left, maintained or kept in any part of a watercourse any trash, debris, excessive vegetation, and other obstacles that would pollute, contaminate, or significantly retard the flow of water through the watercourse.
- Industrial or Construction Activity Discharges: Requires industries with individual, general, or construction NPDES permits to report compliance information to the City for review.
- Compliance Monitoring: Allows the City right of entry for inspection, sampling, and monitoring.
- Prevent, Control, and Reduce Storm Water Pollutants through BMPs: Requires all commercial, industrial, and high-risk facilities to identify, implement, and maintain BMPs to prevent pollution of stormwater to the maximum extent practicable.



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



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



CITY OF PRATTVILLE
Outfall Mapping and Screening Schedule

Figure 2.8
September 2018



- Notification of Accidental Discharges and Spills: Requires responsible parties to notify the City in the event of an accidental discharge or spill within a required time frame.
- Violations, Enforcement, and Penalties: The ordinance provides the City with an escalating level of enforcement actions to address violations of the IDDE ordinance. The City may issue a warning notice, compliance order, stop work order, or a notification of violation. The notification of violation is administered through a City Official as a Uniform Non-Traffic Citation and Complaint. Fines for violations are \$60.00 for a first violation, \$150.00 for a second violation (within a 30-day period), and a court appearance and penalty from a municipal judge for a third violation. After 90 days from rectification of all violations, further violations will be counted as first violations.

2.4.1. Public Education

Public education activities associated with the IDDE program are described in Sections 2.2 and 2.3 of this report.

2.4.2. Public Reporting

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

2.4.3. Grease Control Program

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

2.4.4. Outfall Inventory

The City continued efforts to locate, map, and screen storm water outfalls during the permit year. During this permit year, 111 outfalls have been located and evaluated for the presence of non-storm water discharges. The City completed the

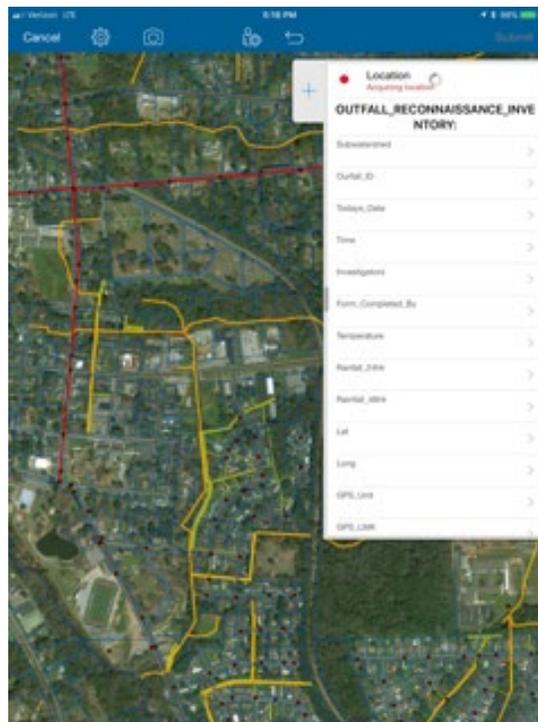
area in Figure 2.8 designated for permit year 2018. There was one illicit discharge identified during the inspections, as discussed in Section 2.4.6.

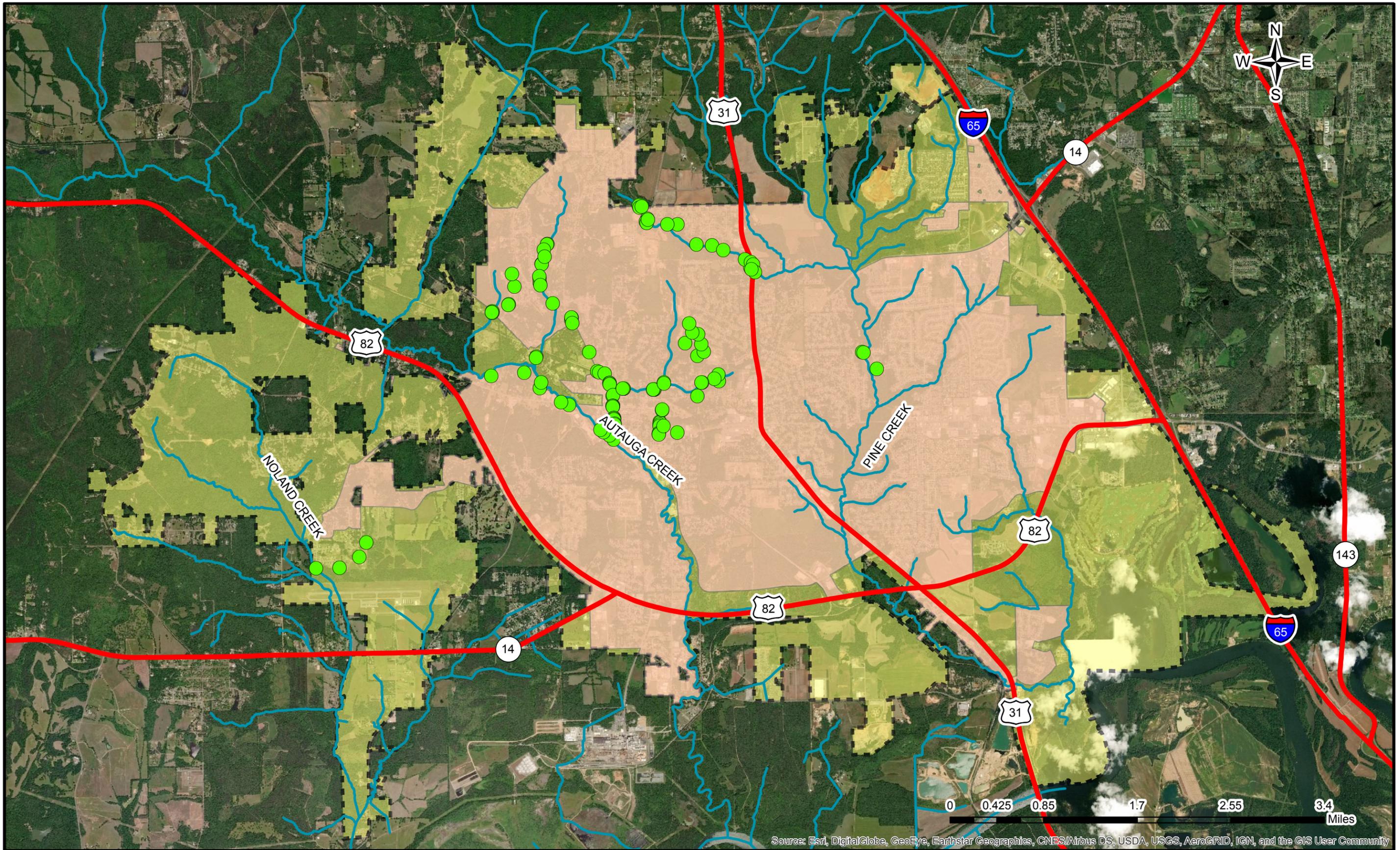
The City's IDDE Program describes the approach and use of best available technology for completing an Outfall Reconnaissance Inventory (ORI) to map and screen storm water outfalls. A mobile application, through ArcGIS Collector, was used to convert the ORI form into an electronic format. This mobile application provides field crews with the following enhanced capabilities:

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

Data collected during the ORI is maintained in the City's GIS dataset for stormwater outfalls. Screen shots of the ArcGIS Collector mobile application are provided in Figure 2.9. A summary of the outfalls screened from 1 October 2017 through 30 September 2018 is provided in Table 2.2 and shown in Figure 2.10. Copies of the outfall mapping forms are provided in Appendix B.

Figure 2.9 ArcGIS Collector Application Screenshot





Prattville City Limits	ALDOT Roads	Streets
2018 Outfalls	Prattville MS4 Area	Streams



CITY OF PRATTVILLE
Outfall Inventory

Figure 2.10
September 2018



Table 2.2 2018 Outfalls Screened by Watershed

Watershed	Total	2017	2018	2019	2020	2021
Noland Creek	4	4				
Autauga Creek	92		92			
Pine Creek	22	3	19			
Totals	118	7	111			

2.4.5. Training

On 3 April 2018, two City staff members tasked with performing outfall mapping and screening were trained by Hydro Engineering Solutions to conduct outfall mapping and screening in the field.

On 26 June 2018, the City's Storm Water Coordinator gave a presentation to 89 City employees from the Public Works Department about the City's MS4 program. The presentation included examples of issues the City has encountered and abated including illicit discharges and connections, construction site runoff, food service issues, and litter problems. A copy of the presentation and Employee training sign-in sheet is provided in Appendix E. Investigations conducted by the City are described in the "Illicit Discharge Investigations" section of this report.

2.4.6. Illicit Discharge Investigations

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

- Malone Court at U.S. Highway 82 – A resident called and complained about sewage in a storm water ditch near his residence. A business had a broken sewer lateral near the City's sanitary sewer manhole. The business was required to repair the sanitary sewer lateral.
- Pinnacle Place – A City of Prattville employee reported a restaurant with oil and grease draining in the parking lot. Upon inspection, the grease holding tank was full and overflowing into a storm sewer inlet, which also clogged the inlet. The City notified the Autauga County Health Department (ACHD) to take appropriate enforcement action and eliminate the illicit discharge.



- Mara Court – The City received a call about a ditch eroding adjacent to Mara Court. Upon inspection, the City found that vegetative cover was thin and had the potential for erosion. The City took the ditch off of its spray list and seeded and strawed the area.
- 228 Rosemary Drive – A City employee reported laundry detergent odor while performing outfall mapping and screening activities. Upon inspection, the employee found a 4-inch diameter pipe with hot water discharging, apparently from a residential washing machine. The address was reported to ACHD take appropriate enforcement action and eliminate the illicit discharge.
- 1427 East Main Street – A City employee reported sewage and laundry detergent odors coming from an eroding area covered with trash and debris. Upon inspection, the City determined that a resident's sanitary sewer lateral was broken and exposed, causing erosion and sanitary sewage to enter Pine Creek. The resident was reported to the City's Code Enforcement for a nuisance violation and ACHD for an exposed sewer lateral violation.
- 1318 Memorial Drive – A City employee reported piles of unpermitted construction debris on a property. Upon inspection, a contractor was using the property as an unauthorized dumping site. The contractor was reported to the City's Code Enforcement and made to clean up the debris.
- 222 Lilac Drive – ADEM received an anonymous complaint regarding a resident collecting stormwater in a non-closed system. Upon inspection, the City discovered that the resident was collecting stormwater in 5-gallon buckets to use for water their garden. There was no indication of mosquito breeding and the activity did not violate any of the City's ordinances.
- Magnolia Drive – A resident posted a message on the City's Facebook page regarding sewage odors near their property. Upon inspection of storm sewer inlet, the City discovered a 8-inch diameter pipe connected to the sanitary sewer main discharging into the inlet. The City grouted the pipe and sealed it the same day.
- 407 New Moon Drive – A resident called about a container on a storm sewer inlet in a neighborhood. Upon inspection, the City discovered that a nearby resident had changed their vehicle oil and left the drip pan on the inlet. The City removed the pan and disposed of the oil in the City's oil waste container.



- Intersection of Hazel Street and Moore Drive – A resident reported a storm sewer inlet cover removed and there was debris in the storm sewer. Upon inspection, the City discovered a used oil filter, vehicle floor mats, oil staining, and trash in the storm sewer inlet. A nearby resident denied dumping the materials into the inlet but was notified of potential fines and penalties for dumping. The materials were removed and disposed of properly before replacing the inlet cover.

A copy of the City investigation records is provided in Appendix B.

2.4.7. Sanitary Sewer System

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

2.5. Construction Site Runoff

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

2.5.1. Legal Authority

On 15 May 2018, the City of Prattville adopted an Erosion and Sediment Control (ESC) Ordinance (Ordinance No. 2018-007). A copy of the ESC ordinance is provided in Appendix B. The ESC ordinance establishes the legal authority for the City to implement a Construction Site Runoff program. Components of the ESC ordinance are described below:

- Administration: Erosion and sediment control will be administered, implemented, and enforced by the Public Works Director.
- Review of Construction Best Management Practices (CBMP) Plan: Requires review and approval of a CBMP Plan prior to commencing land-disturbing activities.
- Grading Permit Requirement: Requires owners to obtain a grading permit prior to performing land-disturbing activities. Grading permits will only be issued pending CBMP Plan review and approval.
- Defines Land-disturbing Activities: Establishes clear definitions of what requires a grading permit and what is exempt. Examples of projects not



- requiring grading permits include minor home repairs and additions, agriculture, minor utility work of less than 1,000 linear feet, excavating burial sites, etc.
- CBMP Plan Requirements and BMP Approval Requirements: Establishes requirements for plans and performance of BMPs associate with land-disturbing activities.
 - Bond Requirements: Requires a letter of credit or surety bond in the amount of \$1,000 for each cleared acre and \$3,000 for each acre of earthwork operations.
 - Compliance Inspection: Allows City Officials the right of entry to inspect, evaluate, request information, and monitor land-disturbing activities.
 - Notification of Accidental Discharges and Spills: Requires responsible parties to notify the City in the event of an accidental discharge or spill within a required time frame.
 - Violations, Enforcement, and Penalties: The City has an escalating level of enforcement actions to address violations of the ESC ordinance. The City may issue a warning notice, compliance order, stop work order, or a notification of violation. The notification of violation is administered through a City Official as a Uniform Non-Traffic Citation and Complaint. Fines for violations are \$60.00 for a first violation, \$150.00 for a second violation (within a 30-day period), and a court appearance and penalty from a municipal judge for a third violation. After 90 days from rectification of all violations, further violations will be counted as first violations.

2.5.2. Permitting and Plan Review

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

- Applicant Information;
- Site Information;
- Project Description;
- Type of Construction;



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

Copies of the permit applications and submittal checklists are provided in Appendix C.

2.5.3. Training and Certification

Currently, the City has five Qualified Credentialed Inspectors (QCIs). A copy of the QCI certificates is provided in Appendix C. During the permit year, the City identified four additional staff that obtained QCI certification.

2.5.4. Education and Training Materials

The City has provided links on its website for education, training materials, and resources for construction site operators, as discussed in the "Educational Materials" section of this report. Prior to 1 July 2018, the City has distributed 636 copies of the "Stormwater Requirements for Construction" to every person obtaining a building permit. After 1 July 2018, the City's Erosion and Sediment Control Ordinance became effective and the Grading Permit Packet was available for informational purposes.

On 21 June 2018, the City hosted a workshop at the Doster Center focusing on the newly adopted Erosion and Sediment Control Ordinance. The City gave a presentation discussing permit requirements, ordinance contents, and new and updated permitting forms and submittals. There were approximately 30 attendees, but only 18 signed the attendance sheet. Pictures from the event are included in Figure 2.3. Presentation materials and an attendance record are provided in Appendix A.

2.5.5. Inspections

During the permit year, the City has created a form for construction site BMP inspections and a general erosion and sediment control plan for residential construction. Copies of the inspection form, standard details, and inspections performed in the permit year are provided in Appendix C.



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

2.5.6. Enforcement

During the permit year, the City established a procedure for enforcing the City's Erosion and Sediment Control Ordinance. Occasionally, the City shall request that ADEM enforce compliance with NPDES permittees in non-compliance. During the permit year, the City filed two complaints concerning construction sites to ADEM for violations of their NPDES permit. These sites received a consent order from ADEM. The City issued the following through the permit year:

- 12 Verbal Warnings;
- Three Notices of Violation (NOVs) Letters; and,
- Two ADEM Complaints resulting in consent orders.

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

2.5.7. Public Reporting

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

2.6. Post Construction Storm Water Management

The City has developed a city wide concept that provides a systematic basis for thinking about the City's future. The future development pattern of the City has been organized with appropriate recognition given to the City's green infrastructure, its street and utility infrastructure, and major existing uses of land.

2.6.1. Legal Authority

On 1 May 2018, the City of Prattville adopted a Post Construction Stormwater Management (PCSM) Ordinance (Ordinance No. 2018-008). A copy of the PCSM ordinance is provided in Appendix B. The PCSM ordinance establishes the legal



authority to the City for implementing a Post Construction Stormwater Management Program. Components of the PCSM ordinance are described below:

- Administration: Post Construction Storm Water Management will be administered, implemented, and enforced by the Public Works Director.
- Storm Water Permit: Requires a permit for qualifying sites which do not fall under exclusions listed in the ordinance.
- Design Standards: Requires the City Engineer to provide a Design Memorandum establishing design standards for Post Construction Best Management Practices (BMPs).
- Maintenance: Requires the property owner or party responsible for maintenance of the BMP to perform and report a BMP inspection annually, provide records of any BMP maintenance performed, and sign an Operations and Maintenance Agreement (OMA).
- Additional Requirements for Home Owners Associations (HOAs): Requires that if an HOA is responsible for maintenance of the BMP, an escrow account is established and funded within a set timeframe. The escrow account will be used for funding any required maintenance activities and provide the City funding for BMP maintenance, repair, or reconstruction if the HOA dissolves.
- Enforcement and Violations: Grants the City the right to inspect and determine if a BMP meets the standards established by the ordinance. If required, the City can issue a Notice of Violation and/or enact the OMA requirements. Violators are subject to the remedies, penalties, and/or enforcement actions as permitted by the City ordinance or state code. If appropriate, the City may determine that emergency action is necessary to cease the violation immediately.

A copy of the ordinance is provided in Appendix D.

2.6.2. Post Construction Technical Memorandum

The City's Post Construction Storm Water Ordinance requires the establishment of design standards through a Design Memorandum. During the permit year, the City developed a technical memorandum describing how it will implement a post construction storm water management program for qualifying new development or redevelopment. Since the most common BMPs used to address post construction stormwater management are detention and retention ponds, the technical



memorandum was developed to address detention and retention ponds first. Additional BMPs may be included in the future. Components of the technical memorandum include the following:

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

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

2.6.3. Waiver Request

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

In order for a project site to be considered for a waiver, the waiver request form must be completed and submitted to the City for review and approval. If a waiver has been submitted for a development that has not been completed and the density of the development is increased and/or modified, the developer is required to resubmit a waiver request for this development. Copies of the Existing Development – Post Construction Storm Water Management Waiver Request Form and Impervious Area – Post Construction Stormwater Management Form are provided in Appendix D.

2.6.4. Water Quality Requirements

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



2.6.5. Low Impact Development

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

2.6.6. Post Construction BMP Plan Review

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

2.6.7. As-built Certification

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

2.6.8. Operation and Maintenance Agreement

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

Should maintenance be needed at a facility as a result of the Annual Inspection, the Owner is required to provide the City with documentation describing the maintenance required and a schedule for completing all maintenance activities. Once all maintenance activities are completed, the Owner is required to provide documentation to the City of the maintenance performed and that the BMP



operates as it was designed. Under the City's OMA, if the owner or developer does not complete the construction of BMPs fully or does not maintain BMPs according to the required standards, the City can perform any necessary measures to bring the BMPs into compliance. The owner is responsible for reimbursing the City for any reasonable costs associated with the completion or maintenance of the BMPs. A copy of the OMA is provided in Appendix D.

2.6.9. Annual Inspection

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

2.6.10. Maintenance Escrow Agreement

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

2.6.11. Workshops

On 18 September 2018, the City co-hosted a "Lunch and Learn" workshop with the City of Montgomery on Post Construction Storm Water Management requirements for the two cities. The cities discussed permit requirements, the updated Technical Memorandum and forms, and Prattville's recently adopted ordinance. Also, vendors with related products were allowed to give presentations and discuss how



their products could help developers meet the new requirements. There were 35 attendees and three vendors at the event.

Pictures from the workshops are shown in Figure 2.3. A copy of the registration form, agenda, presentation, and attendee lists are provided in Appendix A.

2.7. Pollution Prevention and Good Housekeeping

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

2.7.1. Municipal Facilities

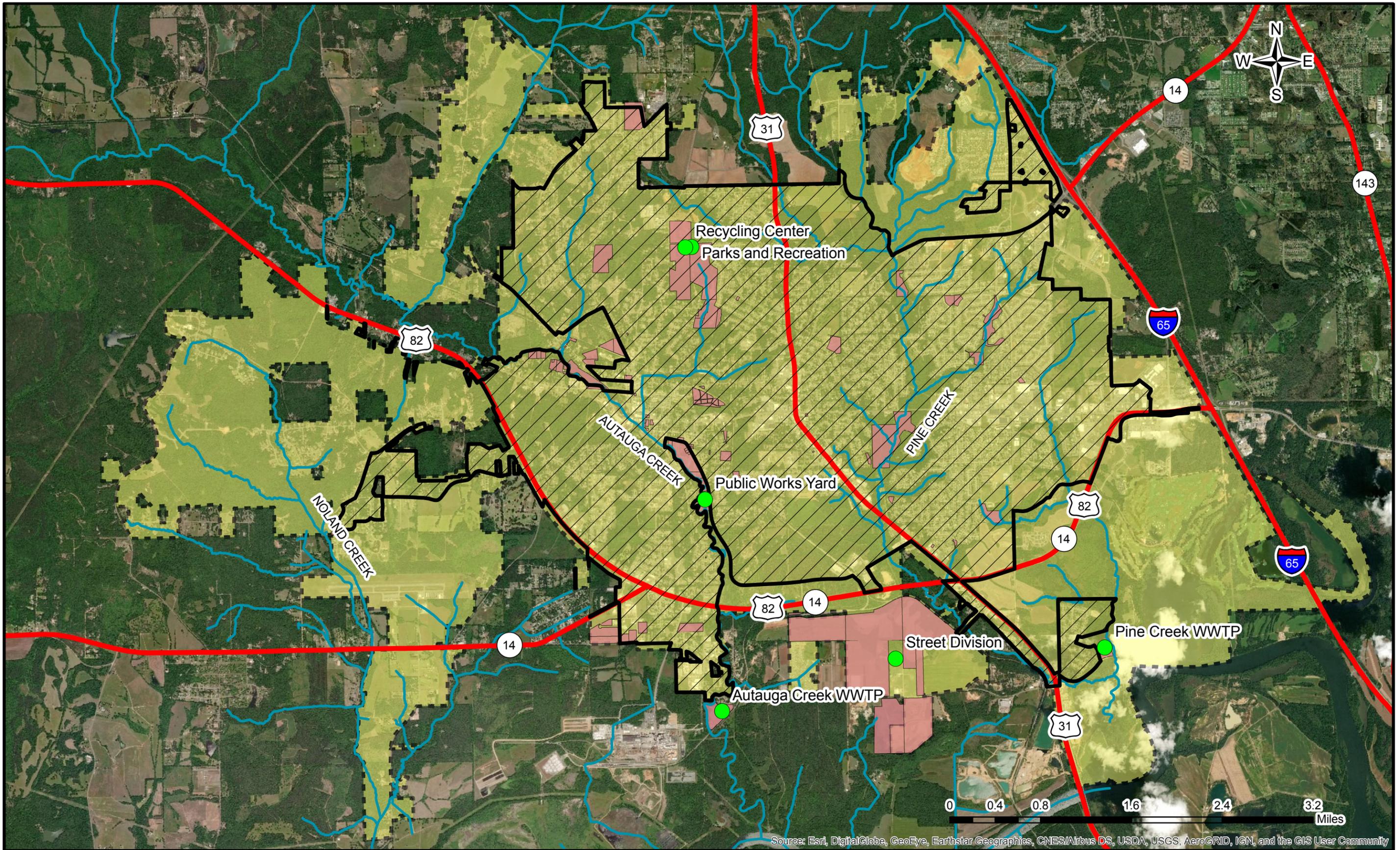
The City provides a wide range of services to its citizens by various City Departments and facilities located throughout the City. The City maintains approximately 117 properties that consist of support facilities, parks, ball fields and building grounds that occupy approximately 1,314 acres (2.0531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

2.7.1.1. Facility Inventory

The majority of municipal properties consist of parks and athletic fields which are actively utilized by the public throughout the year. Maintenance and upkeep of these facilities are performed on a routine basis. Routine inspections of parks and athletic fields will not be performed. The City has identified six facilities where operational activities occur to support City services summarized in Table 2.3 and are shown in Figure 2.11.

Table 2.3 Municipal Support Facilities

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



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



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



CITY OF PRATTVILLE
Municipal Facility Inventory

Figure 2.11
September 2018



2.7.1.2. Municipal Facility Inspections

The City has developed a Municipal Facility inspection form to document annual inspections of Municipal Facilities identified in Figure 2.11. This form includes the following information.

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

During the permit year, the City performed inspections of the six facilities identified as having the potential to contribute to storm water pollution. Copies of the inspection forms are provided in Appendix E.

The City created a BMP “sign-off” sheet and instructions for the Autauga WWTP during the permit year. The Dayshift Operator is responsible for inspecting the facility’s storm sewer inlets every day for obstructions, debris, illicit discharges, or other irregularities. A copy of the instruction sheet and sign off sheet example is included in Appendix E.

2.7.1.3. Standard Operating Procedures

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

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

The City may develop additional SOPs and update existing SOPs for City maintenance activities, on an as needed basis. Existing SOPs are included in Appendix E.



2.7.1.4. Facility Maintenance

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

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

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

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

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

2.7.1.5. Training

On 26 June 2018, the City's Stormwater Coordinator gave a presentation to 89 City employees from the Public Works Department about the City's MS4 program. The presentation included examples of issues the City has encountered and abated including illicit discharges and connections, construction site runoff, food service issues, and litter problems. A copy of the presentation and Employee training sign-in sheet is provided in Appendix E.



2.7.2. Roads

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

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

2.7.2.1. Road Inventory

The City is approximately over 34.25 square miles in size and has over 236.24 miles of roads that range from interstates to local roads. Interstates and State Roads are the responsibility of the Alabama Department of Transportation (ALDOT). The City is responsible for City owned or maintained local roads. An approximate inventory of the roads by classification is summarized in Table 2.4.

Table 2.4 Road Inventory

Operator	Classification	Length (mi)
Alabama Department of Transportation	Interstate / State Roads	12.99
County	County Roads	3.79
City of Prattville	Local Roads	219.46

2.7.2.2. Road Maintenance

Maintenance of the City's road network is performed by the Engineering Department. Routine maintenance activities may include:

- Road inspection;
- Road repairs, resurfacing, and pothole repairs;
- Curb and gutter repairs and replacement;
- Gutter line cleaning;
- Right-of-way maintenance; and,
- Sidewalk maintenance.

The City tracks road maintenance activities through a work order system. An example work order tracking summary is provided in Appendix E.



2.7.2.3. Street Sweeping

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

The City has developed a Street Sweeping Collection Log to track the amount of debris removed from street sweeping activities. This information is incorporated into the Urban Management Debris Removal Summary, which tracks debris removed from street sweeping, litter control, and ditch maintenance activities. Copies of the Street Sweeping Collection Log and Urban Management Debris Removal Summary are provided in Appendix E. During the permit year, the City swept and removed approximately 2,510 cubic yards of material. A graph showing a comparison of street sweeper material collected is shown in Figure 2.12.

Figure 2.12 Street Sweeper Debris – Permit Year Comparison



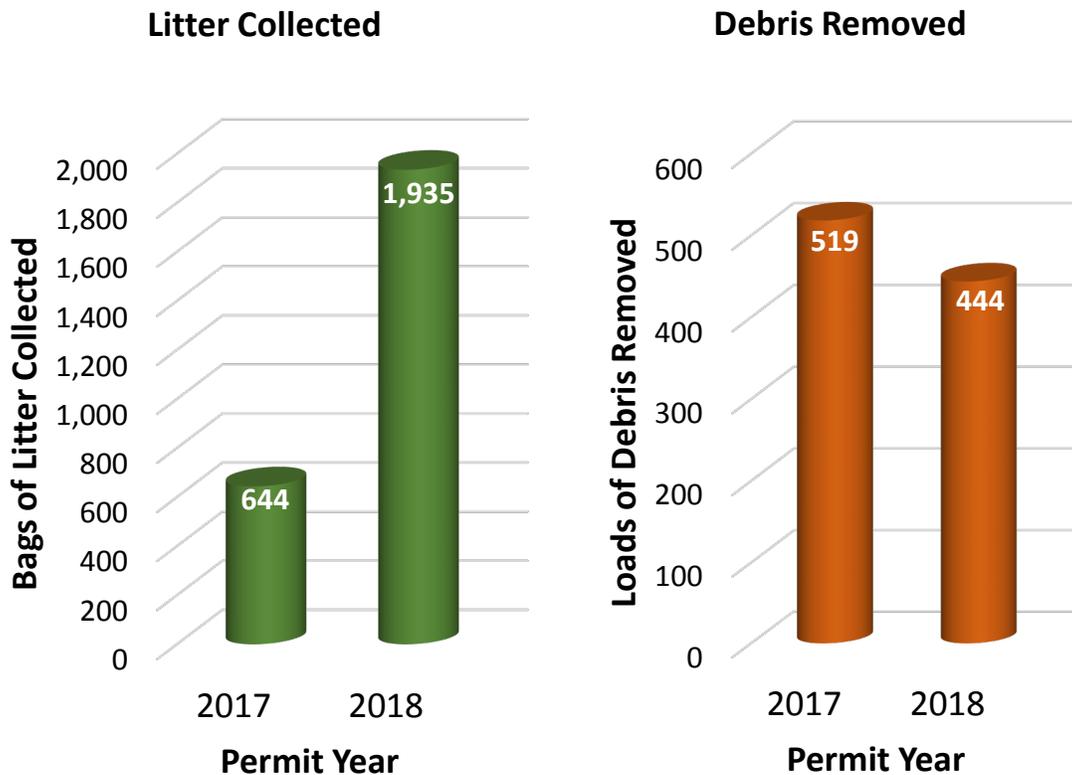


2.7.2.4. Litter Control

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

The Urban Management Department records Daily Checklists for each maintenance crew during the permit year. The forms incorporate tracking the amount of litter removed in bags. This information is incorporated into the Urban Management Debris Removal Summary, which tracks debris removed from street sweeping, litter control, and ditch maintenance activities. Copies of the Urban Management Daily Checklists and Urban Management Debris Removal Summary are provided in Appendix E. During the permit year, the City collected and disposed of approximately 1,934.5 bags of litter and 444 loads of debris. Graphs showing comparison by permit year of litter collected and debris removed is shown in Figure 2.13.

Figure 2.13 Litter and Debris Removal – Permit Year Comparison





2.7.2.5. Deicing Activities

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

2.7.3. Pesticide, Herbicide, and Fertilizer

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

2.7.3.1. PHF General NPDES Permit

The City is currently reviewing ADEM's General NPDES Permit for discharges associated with the application of pesticides to determine if the City meets the requirements to obtain coverage under this permit. The City tracks mosquito (pesticide) spraying activities through the Mosquito Spray Log. A copy of the log is provided in Appendix E.

2.7.3.2. PHF Standard Operating Procedures

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

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

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

2.7.3.3. Facility Inventory

The City maintains approximately 117 properties that consist of support facilities, parks, ball fields and building grounds that occupy approximately 1,314 acres (2.0531 square miles). The locations of City Property are shown in Figure 2.11.



2.7.3.4. PHF Storage Facilities

The City tries to optimize the use of pesticides, herbicides, and fertilizers as well as minimize the quantity of chemicals stored. Chemical storage facilities are summarized in Table 2.5 and shown in Figure 2.11.

Table 2.5 PHF Storage Facilities

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

The City's PHF storage facilities were inspected during the annual Municipal Facility Inspection of the Parks and Recreation Yard and Public Works Yard. The City is currently developing a PHF Storage Facility Checklist.

2.7.3.5. Certification and Licensing

Chemical application is either performed by the Public Works Department or the Parks and Recreation Department. The City has two people that are certified as commercial applicators. Copies of the current certifications are provided in Appendix E.

2.7.3.6. Chemical Inventory

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

2.7.3.7. PHF Application

The Public Works Department has developed a log to document the facility, type and rate of chemical applied, weather conditions, and applicator. A copy of the application log is provided in Appendix E.

2.7.3.8. PHF Disposal

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



2.8. Monitoring Activities

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

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

2.9. Program Strengths

The biggest program strength is that the City has moved forward with developing, managing, and implementing a SWMP. City staff are actively involved in the development, management, and daily implementation of BMPs that will protect and help improve storm water quality. This also allows the City's SWMP to be a dynamic program with the ability to evolve as necessary to meet the specific needs of the City. Advantages of the City's SWMP include but are not limited to the following:

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



2.10. Program Weaknesses

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

- **Program Implementation** – The SWMP is new to the City and requires the City to develop programs for activities that have not previously been performed. As the City develops and implements its SWMP, the City anticipates that the SWMP will change and evolve as staff develop a better understanding of the NPDES permit, rules, and regulations.
- **Funding** – Since the MS4 NPDES permit is driven by an unfunded mandate, the City does not have a dedicated funding source to develop and implement the SWMP. As the City's develops and implements the SWMP, additional staff and resources may be needed to support the activities described in new program elements.
- **Enforcement** – New rules, regulations, and ordinances are being developed in support of the SWMP. Informing the community of new rules, regulations, and ordinance changes will be an ongoing process. Although gradual improvement in compliance will occur over time, there still will be compliance and enforcement issues.
- **Public Expectations** – The public is very aware of environmental related issues and proactively involved in community affairs. Sometimes public expectations exceed the resources and capabilities of the City.



SECTION 3

Summary Tables



3. Summary Tables

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

3.1. Public Education and Public Involvement

Program Component	SWMP Activity Schedule		
	Required	Complied	Accomplished
Public Education (Minimum of 1 activity / year)	Local Partnerships Track	Yes	1 ACES member assists with ESC inspections
	Web Site Update as needed	Yes	Website has been updated
	Social Media Track	Yes	Facebook 21,649 Followers Twitter 3,297 Followers Youtube Channel 126 Subscribers Instagram 1,825 Followers
	Brochures 1/year	Yes	Available on Website 1 Brochure 1 Fact Sheet 3 Booklets 636 Distributed with Building Permits 1 Poster
	Public Service Announcements Track	Yes	4 Public Service Announcements available online
	Workshops Track	Yes	ESC Ordinance Workshop 30 Attendees Post Construction Workshop 35 Attendees 3 Vendors



Program Component	SWMP Activity Schedule		
	Required	Complied	Accomplished
Public Education (Minimum of 1 activity / year – cont.)	Training Track	Yes	1 MS4 presentation 89 City staff attended
Public Involvement (Minimum of 1 activity / year)	Citizen Reporting Tool Track	Yes	Available on City's website
	Water Festival Track	Yes	1 Event Approx. 600 students
	Pet Waste Disposal Stations Track	Yes	7 Stations maintained 3,000 bags purchased annually
	City Recycling Centers	Yes	2 locations Prattville Recycling Center 305.3 tons Overlook Park 56.5 tons Tonnage tracked by Autauga County Commission
	Clean-up Events Track	Yes	Autauga PALS 56 miles cleaned 167 hours community service
	Public Events Track	Yes	CityFest 300 coloring books distributed

Comments

1. Supporting information, documentation, and data summarized in the table are provided in Appendix A.
2. Recycling tonnage not available for July, August, and September 2018.
3. Records and information are maintained in the Public Works Department.



3.2. Illicit Discharges and Improper Disposal

Program Component	SWMP Activity Schedule		
	Required	Complied	Accomplished
Legal Authority	Illicit Discharge Ordinance Update as needed	Yes	Ordinance adopted 15 May 2018 Ordinance effective 1 July 2018
Outfall Inventory	Mapping and Screening Schedule Update as needed	Yes	Schedule was updated in the SWMP Plan
	Outfall Screening Inspection Form Update as needed	Yes	No updates or revisions required
	Outfall Map Annually	Yes	Map has been updated
	Outfall Mapping and Screening Each Outfall 1 / 5 yr	Yes	111 Outfalls
Illicit Discharges	Citizen Reporting Tools Develop	Yes	Available on City's website
	Inspection Form Update as needed	Yes	No updates or revisions required
	Source Tracing Procedures	Yes	No updates or revisions required
	ADEM Notification Procedures Develop	Yes	No updates or revisions required
	Mitigation Procedures	Yes	No updates or revisions required
	Training Develop	Yes	Mapping and Screening field training 1 MS4 presentation with IDDE Identification
	Training Implement	Yes	Mapping and Screening field training 2 City staff 1 MS4 presentation 89 City Staff
Complaints Track	Yes	10 Complaints	



Program Component	SWMP Activity Schedule		
	Required	Complied	Accomplished
Illicit Discharges (cont.)	Illicit discharge investigations Track	Yes	10 illicit discharge complaint investigations 1 Non-stormwater discharge investigation from outfall screening
	Illicit discharges abated Track	Yes	10 illicit discharges abated 1 Non-discharge

Comments:

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



3.3. Construction Site Runoff

Program Component	SWMP Activity Schedule		
	Required	Complied	Accomplished
Legal Authority	Erosion and Sediment Control Ordinance Adopt	Yes	Ordinance adopted 15 May 2018 Ordinance effective 1 July 2018
	Subdivision Regulations Update as needed	Yes	No update or revision required
Permitting	Permit Application Requirements	Yes	Grading Permit and Instruction Packet developed
	Permits issued Track	Yes	188 New Residential 11 New Commercial 628 Other Residential 46 Other Commercial 47 Grading Permits
Plan Review	Construction Best Management Practices Plan (CBMPP) Requirements Update as needed	Yes	Requirements developed
	CBMPP Review Checklist and Procedures Update as needed	Yes	Checklist developed
Inspections	Inspection Requirements Update as needed	Yes	No update or revisions required
	Inspection Form Update as needed	Yes	Inspection Form developed
	Inspections Track	Yes	88 General BMP 21 Monthly 3 Pre-Storm 6 During Storm 3 Post-Storm 6 Final
Enforcement Actions	Enforcement Strategy Develop	Yes	Established by Ordinance
	Enforcement Tracking System	Yes	In development



Program Component	SWMP Activity Schedule		
	Required	Complied	Accomplished
Enforcement Actions (cont.)	Enforcement Actions Track	Yes	12 Verbal Warnings 3 NOV Letters 2 Notices to ADEM
	Citizen Reporting Tools Develop	Yes	Available on City's website
	ADEM Notification Procedures Update as needed	Yes	No update or revision required
Training	QCI Training 1 / Year	Yes	5 Staff Certified 1 Consultant Certified
	Workshop	Yes	1 ESC Workshop 30 Attendees

Comments:

1. Inspections tracked since 1 July 2018.
2. Copies of the QCI training certificates are provided in Appendix C.
3. Supporting information for the Construction Site Runoff Program is provided in Appendix C.



3.4. Post Construction Storm Water Management

Program Component	SWMP Activity Schedule		
	Required	Complied	Accomplished
Legal Authority	Post Construction Storm Water Management Ordinance Adopt	Yes	Ordinance adopted 1 May 2018
	Zoning Ordinance Update as needed	Yes	No update or revision required
	Comprehensive Plan Update as needed	Yes	
	Subdivision Regulations Update as needed	Yes	
Permitting	Permit Application Requirements	Yes	Requirements developed Effective 5 October 2018
	Permits issued Track	Yes	Stormwater Permit developed Effective 5 October 2018
Plan Review	Post Construction Storm Water Management Requirements Develop	Yes	Requirements developed Effective 5 October 2018
	Plan Review Checklist and Procedures Develop	Yes	Procedures Established Technical Memorandum developed Waiver Forms and Design Form developed
Post Construction BMPs	As Built Certification Requirements Develop	Yes	Requirements developed Effective 5 October 2018
Maintenance	Maintenance Requirements Develop	Yes	Requirements developed Effective 5 October 2018
Training	Training As needed	Yes	Post Construction Workshop 35 Attendees 3 Vendors



Comments:

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



3.5. Pollution Prevention and Good Housekeeping

Program Component	SWMP Activity Schedule		
	Required	Complied	Accomplished
Municipal Facilities	Inventory Update as Needed	Yes	6 Facilities
	Inspection Requirements Update as Needed	Yes	No update or revision required
	Inspections Track	Yes	6 Facilities Inspected
	Standard Operating Procedures (SOPs) Update as Needed	Yes	No update or revision required
	Training Program Update as Needed	Yes	New MS4 Training presentation developed
	Training Track	Yes	89 City staff trained
Roads	Road Inventory Update as Needed	Yes	219.46 miles Local
	Maintenance Track	Yes	98 Work orders completed
	Ditch Debris Removal Track	Yes	518.5 loads of debris removed
	Litter Control Track	Yes	643.5 bags of litter
	Street Sweeping Track	Yes	388 yards of sweeping debris
	Deicing Events Track	Yes	0 events where sand was used
Pesticides, Herbicides and Fertilizers	PHF Storage Facility Inventory Update as Needed	Yes	2 Facilities
	Training Update as Needed	Yes	2 City staff are Certified Applicators
	Standard Operating Procedures (SOPs) Update as Needed	Yes	No update or revision required
	Chemical Inventory Track	Yes	Inventory is current
	Chemical Application Track	Yes	Daily Spray Log



Program Component	SWMP Activity Schedule		
	Required	Complied	Accomplished
Pesticides, Herbicides and Fertilizers (cont.)	Chemical Disposal Track	Yes	No disposal required during permit year

Comments:

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



SECTION 4

Summary of Proposed
Program Changes



4. Summary of Proposed Program Changes

4.1. SWMP Review and Update

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

- Table 1-1 SWMP Revision Record;
- Table 4-1 Public Education Program Goals;
- Section 5.10 Illicit Discharge Detection and Elimination (IDDE) Enforcement
- Table 5-4 Illicit Discharge Program Goals;
- Section 6 Construction Site Runoff
- Table 6-1 Construction Site Runoff Program Goals;
- Section 7 Post Construction Storm Water Management
- Table 7-1 Post Construction Storm Water Management Program Goals;
- Table 8-4 Pollution Prevention and Good Housekeeping Program Goals;

Revisions to the Construction Site Runoff and Post Construction Storm Water Management Sections are included as draft versions for this report. The City is planning to allow the public to review and comment on these sections prior to finalization.

4.2. Coordination with Surrounding Municipalities

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

During the permit year, the City did partner with the City of Montgomery to host a Post Construction Storm Water Management Workshop. Workshop materials and an attendance record is provided in Appendix A. Since the City of Prattville was developing a new Post Construction Program, the City of Montgomery assisted by providing technical support and access to their Post Construction program



SECTION 5

Fiscal Analysis



5. Fiscal Analysis

Permit Year 2018 is from 1 October 2017 through 30 September 2018. Many City Departments contribute to the City's SWMP. Since the City's budgeting process does not provided a detailed analysis of the City's effort regarding the stormwater program, the gross annual cumulative budget for departments that contribute to the stormwater program is summarized in Table 5.1.

Table 5.1 Fiscal Analysis

Department	2018 Budget	2019 Budget
Fire	\$ 6,829,686	\$ 7,131,837
Sanitation	\$ 3,584,200	\$ 2,612,944
Wastewater	\$ 31,343,671	\$ 18,641,359
Urban Management	\$ 1,529,729	\$ 1,603,017
Parks and Recreation	\$ 2,442,275	\$ 3,188,486
Engineering	\$ 1,187,074	\$ 1,157,371
Planning	\$ 798,905	\$ 787,301
Public Works	\$ 1,042,347	\$ 827,570
Facilities Maintenance	\$ 857,459	\$ 705,416
Vehicle Maintenance	\$ 424,324	\$ 412,042
Total	\$ 50,039,670	\$ 37,067,343

The City's storm water program is managed by the Public Works Department. For the 2018 Permit Year, the Public Works Department spent \$79,726 for the City's storm water management program. For the 2019 Permit Year, the City has budgeted \$89,777 specifically for the storm water management program.

Comments:

1. The Wastewater Department is planning an expansion of Pine Creek Wastewater Treatment Plant. These costs are included in the 2018 budget.
2. Cost associated with some existing City programs, salaries, and/or activities that are independent of the storm water program, but may provide benefit(s)



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

3. The City's final budget for 2018 and draft budget for 2019 are provided in Appendix G.