

City of Tuscumbia

Annual Report

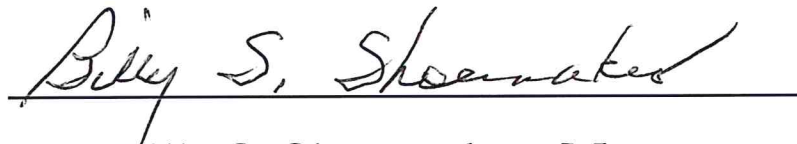
General Permit for Phase II

Small Municipal Separate Storm Sewer Systems (MS4)

NPDES Permit No. ALR 040022

March 25, 2016

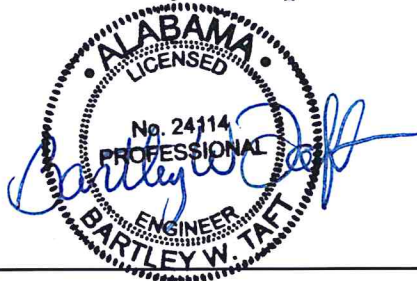
Submitted By:



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Prepared for the City of Tuscumbia

By: The Kelley Group, LLC



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## Introduction

The City of Tuscumbia has completed this Annual Report in Compliance with Part V. C. Reporting of the NPDES Phase II permit No. ALR 040022. The permit requires that the City of Tuscumbia submit an annual report to ADEM each year by March 31<sup>st</sup>. Annual Reports should cover the year (April 1 – March 31) prior to the submittal date. This annual report covers the period from April 1, 2015 to March 31, 2016. In accordance with the requirements of the permit, the Annual Report includes the following:

- (a) The status of your compliance with permit conditions, an assessment of the appropriateness of the identified BMPs, progress towards achieving the statutory goal of reducing the discharge of pollutants to the Maximum Extent Possible (MEP), and the measurable goals for each of the minimum control measures;
- (b) 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;
- (c) A summary of the Stormwater activities you plan to undertake during the next reporting cycle (including an implementation schedule).
- (d) Proposed changes to your SMWP, including changes to any BMPs or any identified measureable goals that apply to the program elements;
- (e) Notice that you are relying on another government entity to satisfy some of your permit obligations (if applicable); and
- (f) All Monitoring results collected during the previous year in accordance with Part V, if applicable. The monitoring reports shall be submitted in a format acceptable to the Department.

These elements will be addressed within the Annual Report and in each section detailing the implementation of the six minimum measures:

- A) Public Education
- B) Public Involvement
- C) Illicit Discharge Detection and Elimination
- D) Erosion and Sedimentation Controls
- E) Post-Construction Stormwater Runoff Control
- F) Good Housekeeping

**City of Tuscumbia, Alabama**  
**NPDES Phase II Annual Report**  
**Permit # ALR040022**  
**March 25, 2016**

This report documents the activities related to each of the 6 Minimum Control Measures, including the BMP and rational statement, as required by the City of Tuscumbia NPDES Stormwater (MS4) permit.

The Appendix includes documentation of the action items for the BMP efforts made by the City to comply with the permit and the SWMP.

**I. Public Education and Outreach**

**a. BMP No. 1 – Mail out flyers to homes and businesses two times per year.**

Problems Addressed: The main source of pollution addressed by public education and outreach is trash, litter, soil disturbances, chemicals, and individual oil changes.

Rational for BMP: The problems addressed by this BMP are most common to residences and businesses in this area. Correcting these problems will go a long way toward cleaning up the waters in this area. The published information reaches a large segment of the population by placing billboards and signs at strategic locations and coordinating with “Keep the Shoals Beautiful” and the Chamber of Commerce and Civic Organizations.

Activities:

1. Ongoing: In previous years, ordinances have been adopted which encourage the limited use of fertilizer, pesticides, and herbicides within the City. The City continues to get involved and support activities and events that educate the public on how litter and pollution control can help the environment.
2. 2015-2016 Activities:

Shoals Solid Waste Authority (SSWA): This organization is supported by the City with funding and drop off locations. Special projects include:

- Bought radio advertisement on the local FM radio station.
- Mentioned in news articles in the local newspaper (Times Daily).
- Helped sponsor community events. Provided recycling services for the following events and distributed literature related to recycling (See Appendix for brochure):
  - Saddle Up for St. Jude

- NWSCC B.E.S.T. Robotics
- Helen Keller Festival
- W.C. Handy Festival
- Kiss FM Kid's Fair
- Sheffield Athletic Golf Tournament
- Big Brother & Big Sister Fishing Tournament
- Kiss FM Stuff-A-Bus
- Shoals Earth Day
- PALS Earth Day
- Christmas @ the Mall
- Christmas Parades in Colbert County
- PAWS in the Park
- Partner with Keep the Shoals Beautiful
- Easter Bunny Arrival
- Jazz it Up with Trash

“Keep the Shoals Beautiful” (KTSB): This organization is supported by the City with annual financial support for public education. Special projects included:

- Provided billboard advertising encouraging citizens to stop litter and keep the Shoals area clean (See Appendix for picture of billboard)

Signs: The City continues to maintain various anti-litter signs throughout the area to remind people to keep the Shoals clean. “Do Not Dump” and “Do Not Litter” signs were replaced and installed in various places. The Street Department also continues to install tags on storm drain inlets and junction boxes to warn the public that drainage enters waterways and discourage dumping. (See Appendix for letter from Public Works Director and pictures of signs maintained around the City.)

Brochures, Flyers, Etc.: Materials are displayed at the utility department and the building department for citizens to pick up. Information related to stormwater management is shared with civic organizations such as Kiwanis Club and Civitan Club.

Utility Bills: Statements asking for citizens to help prevent stormwater pollution and describing actions to take are periodically placed on utility bills before mailing (See Appendix for copy of utility bill with statement). These notices typically arrive in April and October.

Changes: The annual public hearing will now be placed on the water bill as an additional notice in the month prior to the scheduled meeting.

Responsible Party: Cody Dobbs, Parks and Rec Department

#### **b. BMP No. 2: Run-Off Reduction/ Permeable Pavement**

Problems Addressed: The main source of pollution addressed by this BMP is soil erosion during construction.

Rational for BMP: The majority of soil erosion and introduction of silt into the stormwater system is due to construction activities which disturb the soil. By placing restrictions of this BMP on contractors and developers, soil erosion will be controlled and the waters will be kept cleaner. Requirements are outlined in the subdivision regulations, SWMP, and the new stormwater ordinances.

Activities:

1. Ongoing: Regulations and ordinances now dictate that contractors and developers will adhere to the rules which have been adopted to control erosion. The City requires engineers to provide monthly inspection reports for the City to review. The City's staff also provided inspection and enforcement of the rules. BMP for each project exceeding 1 acre is required and is reviewed by the City Review office. Permits are issued or excavation prior to any soil disturbance.
2. 2015-2016 Activities: The frequency of action is continual. Every construction project is reviewed for compliance with the city regulations (See Appendix for copies of City ordinances related to erosion control).

Changes: The City of Tuscumbia has enacted new stormwater ordinance that requires a permit for any land disturbance greater than 3600 sq. ft.

**c. BMP No. 3 – Site Protection – Increased Vegetation and Green Areas**

Problems Addressed: The main source of pollution addressed by this BMP is soil erosion and quality of stormwater runoff.

Rational for BMP: By increasing the amount of vegetative cover and green areas in land development, the amount of stormwater runoff and soil erosion will be reduced. Greenway areas allow for stormwater infiltration into the ground and keep it out of the stormwater system. Vegetative cover also acts as permanent stabilization of the soil and reduces the amount of soil erosion and siltation into the stormwater system.

Activities:

1. Ongoing: Regulations and ordinances now dictate that developers will adhere to the specific design requirements and sediment and erosion control requirements. Every new development design is reviewed for compliance with the city regulations.
2. 2015-2016 Activities: No new activities reported for this BMP.

**II. Public Involvement and Participation**

**a. BMP No. 1: Public Hearing for Public Involvement at least every other year**

Problems Addressed: The problem addressed in this BMP is associated mainly with littering

by the public and the general disregard for erosion and pollution problems.

Rational for BMP: The rationale for this bmp is that as more citizens are involved in the decision making process and in cleanup activities the more they will be aware of the problems related to litter and erosion. Public involvement and participation helps to increase the general awareness and concern over these issues. These activities also involve environmentally concerned individuals and help get citizens involved in reporting violations to be enforced by City officials.

Activities:

1. Ongoing: Citizens are encouraged to clean up their areas and to stop littering and notify City officials of littering and erosion issues. The City has also participated in the Groundwater Guardian Program which is a committee of local officials, business owners, and concerned citizens that implements educational programs for children and adults about the importance of protecting the natural groundwater resources in the area. This committee continues to distribute literature and promote education programs.

Changes: The public hearing will be changed to occur once each year. The change should help keep the public more informed and involved by being a part of the storm water plan and contributing more regularly than once every other year. The annual date of the public hearing will be posted on the City of Tuscumbia website. Minutes from that public hearing will be posted to the website for those that could not attend.

Responsible Party: Cody Dobbs, Park and Rec Department

2. 2015-2016 Activities:

Shoals Solid Waste Authority (SSWA): This organization is supported by the City with funding and drop off locations. Special projects include:

- Ran radio advertisements on local FM station.
- Distributed brochures and other materials to the general public on recycling at several public events in the area throughout the year. Also provided recycle bins during community events. (See I.a.2. above for list of events)
- Promotion of services contributed to Colbert County recycling 1012 tons of material through the SSWA.

“Keep the Shoals Beautiful” (KTSB): This organization is supported by the City with annual financial support. Special public involvement projects included:

- Sponsored city-wide cleanup event in June 2016.
- Sponsored an Earth Day event in April 2016.
- Assisted other organizations with clean-up events.
- Assisted SSWA with recycling and litter prevention displays during community events.

Changes: Changes to the documentation of this BMP will be installed. All activities



will be documented and maintained for viewing by the general public. Records will be kept in the Building Inspector's Office.

Responsible Party: The City of Tuscumbia Building Inspector

**b. BMP No. 2: Stenciling at Stormwater Inlets**

Problems Addressed: The problem addressed in this BMP is associated mainly with illicit dumping by the general public into stormwater system inlets.

Rational for BMP: The rationale for this BMP is to make citizens aware that whatever enters a stormwater inlet may eventually enter our rivers and streams. This awareness should reduce the amount of illicit discharges by the general public.

Activities:

1. 2015-2016 Activities: The City of Tuscumbia Public Works Department continues to maintain and install curb tags at storm drains around the city (See Appendix or picture of curb tag).

Changes: A log of each stenciled storm water inlet will be created over the next calendar year. The log will capture geocoded photographs of each inlet within the city and be maintained in a file available to the general public. Records for the stenciling program will be maintained in the Building Inspector's office.

Responsible Party: Greg Willingham, Assistant Public Works Director

**c. BMP No. 3 – Art Contest at Elementary Schools**

Problems Addressed: The problem addressed in this BMP is associated mainly with littering and the general disregard for pollution problems.

Rational for BMP: the rationale for this BMP is that good habits are best learned at a young age. If our children can be involved in litter prevention and become aware of the issues related to pollution, they will be more proactive as adults.

Activities:

1. 2015-2016 Activities:

“Keep the Shoals Beautiful” (KTSB): This organization is supported by the City with annual financial support. Special projects focusing on elementary schools include:

- “Cleanup Campus Contest” for all Tuscumbia elementary students. This contest provided an opportunity to win the Steve Trash Award (See Appendix for copy of flyer).
- “Keep the Shoals Beautiful Scholarship”: This scholarship was established to encourage volunteer activity that supports a cleaner environment. The cash

scholarship is awarded to one high school student and one college student in the Shoals who has demonstrated initiative and participation in our community service projects that promote a clean environment (See Appendix for copy of application).

Changes: No changes are planned for this BMP

Responsible Party: City of Tuscumbia Building Inspector

### III. Illicit Discharge Detection & Elimination

#### a. **BMP No. 1: Enforcement Personnel to Re-certify QCI**

Problems Addressed: The problem addressed with this BMP is the lack of training regarding the effects of illicit discharges, proper BMP measures and the lack of enforcement of City ordinances.

Rational for BMP: The rationale for this BMP is that an enforcement process is necessary to work toward eliminating the problem associated with illicit discharges. City officials will be informed and trained regarding the hazards associated with illicit discharges and proper BMP measures.

Activities:

1. Ongoing: All ordinance requirements related to illicit discharges were completed prior to 2010. Mr Luster Echols with the City of Tuscumbia is responsible for BMP review and code enforcements (See Appendix for copy of Illicit Discharge Ordinance).
2. 2015-2016 Activities: The City purchased the “Illicit Discharge Detection and Elimination” DVD training kit which includes the training program, a trainer’s guide, employee quizzes and acknowledgement forms. No specific information was given in regards to the number of city employees or officials trained (See Appendix for receipt of training materials).

Changes: A third party consulting engineer has been retained to provide personal instruction on BMP review and to assist the Building Inspector with performance and record keeping tasks for this BMP.

Responsible Party: The City of Tuscumbia Building Inspector’s Office.

#### b. **BMP No. 2: Site Inspections – Industrial, Commercial, Construction Sites**

Problems Addressed: The problem addressed with this BMP is the illicit discharge by industrial, commercial sites, and construction sites into the City stormwater system.

Rational for BMP: The rationale for this BMP is that an inspection process is necessary to identify illicit discharges and enable the City to enforce the ordinances related to such discharges.

Activities:

1. Ongoing: The City continues to conduct routine inspections of the stormwater discharge points and other sites. Inspections have revealed no illegal dump sites within the city. The City may use consultants with QCI trained personnel and the QCP personnel or conduct their own inspections. Mr. Luster Echols with the City of Tuscumbia receives copies of all inspection reports and keeps them on file.
2. 2015-2016 Activities: Monthly site inspections were performed on all active construction sites. A report of each inspection specifying any BMP deficiencies to be corrected was submitted to the permit holder as well as the City. Copies of all inspection reports are on file with the City of Tuscumbia.

Changes: Tuscumbia has created a construction best management package containing a site development Process Flow Chart to assist developer's with the proper sequence of events to obtain permits and subdivision approval. A site development application and checklist has been created to be supplied to each individual seeking a construction permit. ADEM's Construction Best Management Practices Plan template has been included in the information packet. The Building Inspector's office has been provided with multiple Construction Site Inspection Forms for recording site inspection monthly and after each 3/4" rainfall event.

Responsible Party: The City of Tuscumbia Building Inspector

**c. BMP No. 3: Stormwater Runoff Sampling & Testing – Once per Year**

Problems Addressed: The problem addressed with this BMP is stream contamination caused by illicit discharges.

Rational for BMP: The rationale for this BMP is that sampling and testing stormwater at the known outfall of the City's stormwater system will help to identify issues so further inspection and enforcement can take place.

Activities:

1. Ongoing: There were no changes to the City's stormwater maps in 2015-2016. Analysis of stormwater runoff is being done annually.
2. 2015-2016 Activities: Stormwater sampling and testing was performed at six locations by Southern Environmental Testing, Inc. The sampling was performed on XXXXX. Samples were tested for oil & grease, pH, and total suspended solids (TSS). (See Appendix for copies of test results).

Changes: Testing Data for past and future tests will be compiled and correlated to the basin tested and identified by location on the City's Stormwater maps. The number of active construction permits within that basin for the permit period will be tabulated and recorded.

Responsible Party: Greg Willingham, Assistant Public Works Director

#### **IV. Construction Site Stormwater Runoff Control**

##### **a. BMP No. 1: All Construction Sites Permitted by City and ADEM**

Problems Addressed: The problem addressed with this BMP is the runoff of silt and other illicit discharges into the City stormwater system from construction sites.

Rational for BMP: The rationale for this BMP is that by requiring contractors to follow the permitting process for stormwater runoff, they will be given the proper BMP measures to follow to minimize erosion and illicit discharges. These permits also include regular inspections that will hold them accountable to the permit requirements.

Activities:

1. Ongoing: The City addresses erosion and sediment controls at construction sites through subdivision regulations and ordinances. These are enforceable by City officials and also apply to non-subdivision type construction projects. Mr. Luster Echols with the City of Tuscumbia is responsible for reviewing all inspection reports, keeping a copy on file and enforcing all related ordinances and regulations (See Appendix for copies of ordinances).
2. 2015-2016 Activities: All construction sites were permitted and inspected.

Changes: Tuscumbia recently initiated a more restrictive change from the 1-acre threshold typical of ADEM regulations for land disturbance and passed a resolution requiring the City be notified, and application be made for any land disturbance activity greater than 3600 sq. ft. Also, a QCP will now perform monthly review of Tuscumbia's open permits and assist the Building Department with routine inspections and recording.

Responsible Party: City of Tuscumbia Building Inspector.

##### **b. BMP No. 2: Follow Up on Inspections If Required**

Problems Addressed: The problem addressed with this BMP is the lack of concern the holder of the stormwater permit exhibits to address deficiencies noted in the inspection reports.

Rational for BMP: The rationale for this BMP is that an enforcement process is necessary to ensure compliance with the permitting requirements.

Activities:

1. Ongoing: Follow up inspections of permitted construction sites is an ongoing activity by the City Building Department. Copies of inspection reports outlining any problems or deficiencies are sent to Mr. Luster Echols with the City of Tuscumbia. A trained and certified QCI or QCP with the City will follow up on any inspection violations reported. Copies of the inspection reports will be kept on file.
2. 2015-2016 Activities: No information was submitted as to the number of inspections performed and/or the number of violations found.

Changes: The Building Inspector's Office will keep individual files for each permit applied for and will maintain inspection reports for each location until that construction site is closed.

**c. BMP No. 3: Construction Stormwater Runoff Sampling and Testing**

Problems Addressed: The problem addressed with this BMP is stream contamination caused by erosion of silt and/or illicit discharges.

Rational for BMP: The rationale for this BMP is that sampling and testing stormwater runoff from construction sites will ensure the contractor's compliance with BMP measures and determine if additional measures need to be put in place.

Activities:

1. 2015-2016 Activities: No information was submitted as to the number of stormwater samples taken at construction sites and the test results.

Changes: A QCP will now assist the Building Inspection department with establishing the protocol to be used in selecting when construction site sampling will take place.

Responsible Party:

**V. Post Construction Stormwater Management in New Development and Re-Development**

**a. BMP No. 1: All Construction Sites Secured with Vegetation and Run-off Control**

Problems Addressed: The problem addressed with this BMO is soil erosion and sedimentation due to construction sites that are completed but without complete soil stabilization.

Rational for BMP: The rationale for this BMP is it will ensure the continuation of sediment and erosion control measures until permanent stabilization is achieved by requiring owners to provide a bond to cover the cost of replacing or establishing such measures.

Activities:

1. Ongoing: The City addresses this requirement by requiring all construction and development plans to have a BMP that shows erosion control measures and final permanent stabilization. Mr. Luster Echols with the City of Tuscumbia is responsible for overseeing and enforcing all related ordinances and regulations.
2. 2015-2016 Activities: No new activity reported for this BMP.

**b. BMP No. 2: Post Construction Maintenance Agreements**

Problems Addressed: The problem addressed with this BMP is that once some developments are completed, the site is not maintained for sediment and erosion control.

Rational for BMP: The rationale for this BMP is it will ensure the long term operation and maintenance of sediment and erosion control measures by requiring owners to sign an agreement to be recorded with the property deed or plat that transfers to any new owner or operator the responsibility for post-construction management.

Activities:

1. Ongoing: This requirement is monitored with existing ordinances and regulations. The City continues to require a Post-Construction Maintenance Agreement to be recorded with the final plat.
2. 2015-2016 Activities: No new activities reported for this BMP.

**VI. Pollution Prevention / Good Housekeeping for Municipal Operations**

**a. BMP No. 1: Personnel Training**

Problems Addressed: The problem addressed with this BMP is City personnel not adequately trained and aware of BMP requirements and the effects of pollution.

Rational for BMP: The rationale for this BMP is that many of the City personnel are in a position to prevent pollution and erosion or at least observe the activities of others. By adequately training them in proper BMP requirements, it will help to ensure good housekeeping practices and pollution prevention through personal practice or notification of observed violations.

Activities:

1. Ongoing: The City has provided in-house education for its maintenance personnel and will continue these programs in the future. City employees who have received their QCI certification continue to complete the refresher courses each year.
2. 2015-2016 Activities:

- a) The Building Department maintains copies of the Alabama Handbook for Erosion Control, Sediment Control, and Stormwater Management on Construction Sites and Urban Areas (Volumes 1 & 2) for use and reference by City officials.
- b) The City of Tuscumbia has used the DVD training kit entitled “Stormwater Pollution Prevention for Municipalities – Rain Check” to train city employees on good housekeeping practices.
- c) One City official, Mr. Bo Stanley, was re-certified as QCI on XX/XX/2015 (See Appendix for copy of certification).

**b. BMP No. 2: Solid Waste Collection from Streets and Drains**

Problems Addressed: The problem addressed with this BMP is the polluted runoff that occurs when runoff from impervious areas wash litter and other floatables into the stormwater system.

Rational for BMP: The rationale for this BMP is that by collecting solid waste from streets and drains will prevent it from getting into the stormwater system and making its way into rivers and streams.

Activities:

1. Ongoing: The City continues to conduct regular surveys throughout the city for litter and collects it for proper disposal. Records are kept and reported each year as to the total poundage of litter retrieved and disposed of at the landfill. The City runs a street sweeper through the downtown area a few times each year. They also pick up leaves piled up along gutters by citizens from October through March.
2. 2015-2016 Activities: The Public Works Department cleaned out numerous storm drains and gutters and collected litter to prevent it from reaching the storm system. This prevented debris from reaching Spring Creek (See Appendix for a storm debris and leaf collection report).

During 2016-2017, the City plans to implement the following general BMP's.

A. Public Education and Outreach

1. Continue support of SSWA and KTSB organizations and their events related to public education and advertising in local newspapers and billboards.
2. Continuing maintain anti-litter signs.
3. Continue including pollution prevention statements on utility bills.
4. Continue providing brochures to the general public.

B. Public Involvement / Participation

1. Continue to work with KTSB and their events related to involving individuals and schools in pollution prevention.

2. Support April as “Earth Month” in Tuscumbia
  3. Host a city wide cleanup day in June
  4. Continue placing curb labels at storm drain inlets around the city.
- C. Illicit Discharge Detention and Elimination
1. Inspections by City personnel or its designee once each month.
  2. Stormwater runoff samples once per year
- D. Construction Site Stormwater Runoff Control
1. Continue to require stormwater permits for all construction sites.
  2. Continue making periodic visits to construction sites giving priority to those under violation of the permit.
- E. Post Construction Stormwater Management in New and Redevelopment
1. Continue requiring bonding on developments before final plat approval.
  2. Continue requiring maintenance agreements.
- F. Pollution Prevention / Good Housekeeping
1. Instruction for city personnel once per year.
  2. Continue to identify certain City officials to be in charge of BMP requirements for various departments.
  3. Personnel to attend QCI training course annually.