

STORM WATER MANAGEMENT PROGRAM PLAN
June 2017

Prepared For
City of Trussville
131 Main Street
Trussville, Alabama 35173

Prepared by
Jefferson County Department of Health.
1400 Sixth Avenue South
Birmingham, Alabama 35233
(205) 930-1230

Signatory and Certification Requirements:

I certify under the 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 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.

Buddy Choat
Mayor, City of Trussville

Date

Address: 131 Main Street
Trussville, Alabama 35173

Phone: (205) 655-7478

CONTENTS

INTRODUCTION.....	8
Regulatory Overview.....	8
MS4 Jurisdictional Boundary	9
LEGAL AUTHORITY AND ENFORCEMENT.....	9
STORM WATER COLLECTION SYSTEMS OPERATIONS.....	13
Structural Controls Mapping.....	13
Structural Controls Inspection	13
Standard Operating Procedure (SOP) for Structural Control Inspection and Maintenance Procedures.....	13
Stabilization and Re-Vegetation of Eroded Areas.....	14
Floatables, Litter, Sediment and Debris in Structural Controls	14
PUBLIC EDUCATION AND PUBLIC INVOLVEMENT ON STORM WATER IMPACTS 	15
Development and Implementation of the SWMPP	15
Targeted Pollutant Sources for Public Education	15
Reduction of Litter Floatables and Debris	15
Educating Individuals and Households on Reducing Storm Water Pollution	15
Community Involvement with the Storm Water Program.....	16
General Public	16
Businesses.....	16
Homeowners, Landscapers, and Property Managers.....	16
Engineers, Contractors, and Developers	17
Evaluating the Effectiveness of the Public Education Program.....	17
Public Awareness Activities	17
ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDDE)	18

MS4 Map.....	18
Ordinance/Regulatory Mechanism.....	18
Dry Weather Screening Program.....	18
Source Identification	19
Illicit Discharge Elimination	19
ADEM Notification by the City	19
Illicit Discharge Reporting by the Public	20
Personnel Training	20
Ordinance/Regulatory Mechanism Availability	20
CONSTRUCTION SITE STORM WATER RUNOFF CONTROL.....	21
Site Plan Reviews.....	21
Site Inspection Plan	21
Training of MS4 Site Inspection Staff.....	21
Construction Site Inspection Checklist.....	21
Enforcement Response Plan (ERP).....	22
Construction Site Operator Training	22
POST-CONSTRUCTION STORM WATER MANAGEMENT IN NEW DEVELOPMENT AND RE-DEVELOPMENT.....	23
Ordinance/Regulatory Mechanism.....	23
Inventory of Post Construction Structural Controls	23
SPILL PREVENTION AND RESPONSE	24
Spill Prevention/Spill Response Plan	24
Personnel Spill Prevention/Response Training.....	24
POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS	24
Municipal Facilities Inventory.....	24
Good Housekeeping Practices SOP	24

Inspection Plan.....	25
Good Housekeeping Training Program.....	25
APPLICATION OF PESTICIDES, HERBICIDES, AND FERTILIZERS (PHFs)	25
Application and Storage.....	25
PHF Training Program.....	25
Oils, TOXICS, and Household Hazardous Waste	27
Public education on proper disposal	27
Annual employee Training.....	27
INDUSTRIAL STORM WATER RUNOFF.....	27
Inventory of high risk Facilities	27
Inspection of high risk Facilities.....	27
WET-WEATHER MONITORING AND REPORTING	29
Monitoring Locations	29
Impaired Waterways.....	29
Monitoring Parameters and Frequency.....	29
Sample Type, Collection and Analysis	30
Other requirements.....	32
SWMPP PLAN REVIEW AND MODIFICATION	32
Annual Report.....	32

FIGURES

Figure 1: MS4 Boundary.....	12
Figure 2: Municipal Facilities.....	26
Figure 3: Industrial and High Risk Facilities	28
Figure 4: Sampling Sites	31

APPENDICES

Appendix A - ADEM Permit ALS000015

Appendix B - Storm Water Collection Systems Operations

Appendix C - Illicit Discharge Detection and Elimination (IDDE)

Appendix D - Construction Site Storm Water Runoff Control

Appendix E - Spill Prevention and Response

Appendix F - Pollution Prevention/Good Housekeeping for Municipal Operations

Appendix G – Industrial Storm Water Runoff

INTRODUCTION

REGULATORY OVERVIEW

The City of Trussville (City) was issued by the Alabama Department of Environmental Management (ADEM) a Municipal Separate Storm Sewer System (MS4) Individual Phase I Permit (ALS000015) on December 20th, 2016 (**Appendix A**). This permit took effect on January 1, 2017. Previously, the City was included as a Co-Permittee under permit number ALS000001.

As a condition of this permit, “The permittee is required to develop, revise, implement, maintain and enforce a storm water management program (SWMP) which shall include controls necessary to reduce the discharge of pollutants from its MS4 consistent with Section 402(p)(3)(B) of the Clean Water Act and 40 CFR Part 122.26. These requirements shall be met by the development and implementation of a storm water management program plan (SWMPP) which addresses the best management practices (BMPs), control techniques and systems, design and engineering methods, public participation and education, monitoring, and other appropriate provisions designed to reduce the discharge of pollutants from the MS4 to the Maximum Extent Practicable (MEP)”.

Per the requirements of NPDES Permit Number ALS000015, BMPs, measurable goals, and responsibility designations are provided for each of the following program elements:

- Storm Water Collection System Operations
- Public Education and Public Involvement on Storm Water Impacts
- Illicit Discharge Detection and Elimination
- Construction Site Storm Water Runoff Control
- Post-Construction Storm Water Management in New Development and Re-Development
- Spill Prevention and Response
- Pollution Prevention/Good Housekeeping for Municipal Operations
- Application of Pesticide, Herbicide, and Fertilizers
- Oils, Toxics, and Household Hazardous Waste Control
- Industrial Storm Water Runoff

ADEM defines the fiscal year as October 1st to September 30th. Annual reports are required to be submitted to ADEM no later than January 31st following the previous fiscal year.

MS4 JURISDICTIONAL BOUNDARY

Trussville's MS4 boundary is bound to the north by the cities of Clay, to the south by the cities of Birmingham, Irondale and Leeds, and to the east and west by Jefferson County and St. Clair County. Approximately 33 square miles of residential, commercial, industrial, undeveloped lands, and streams make up the MS4 boundary. See **Figure 1: MS4 Boundary**.

There is one waterbody, the Cahaba River, which is considered impaired by the U.S. Environmental Protection Agency and ADEM within the MS4 boundary. The Cahaba River has a listed Total Maximum Daily Load (TMDL) for Siltation and Habitat Alteration as well as for Nutrients. Designated uses of this section of the Cahaba River include being listed as an Outstanding Water of Alabama (OAW) and Fish and Wildlife (F&W).

LEGAL AUTHORITY AND ENFORCEMENT

Part II C of the permit requires the City to review and revise its ordinances and regulatory mechanisms as necessary to comply with the permit. Below is a summary of the current ordinances, municipal code, and regulations related to the management of Trussville's MS4.

- **Ordinance 99-013**, Erosion and Sedimentation Control Ordinance: This ordinance was passed to control sedimentation leaving construction sites. The ordinance describes the fees, regulations, and the requirements surrounding a land disturbing permit issuance.
- **Ordinance #**, Trussville Subdivision & Development Regulations: This ordinance addresses design requirements for stormwater infrastructure.
- **Ordinance 99-019**, Tree Ordinance: [Needs Description](#)
- **Ordinance 99-019**, Flood Ordinance: [Needs Description](#)

The following table reflects which City department is responsible for implementing or coordinating BMPs for each separate program element:

DEPARTMENT	RESPONSIBILITIES
Storm Water Collection Systems Operations	
JCDH/SWMA	Maintain map of City owned/maintained structural controls
Inspections	Semi-annual inspection of new and existing structural controls
Inspections	Develop SOP, inspection checklist, and maintenance procedures
Public Works	Stabilize and re-vegetate eroded areas as needed
Public Works	Remove floatable, litter, sediment, and debris from structural controls
Public Education and Public Involvement on Storm Water Impacts	
Administration	Seek and consider public input in the development and implementation of the SWMPP
Public Works	Post signs prohibiting littering and illegal dumping
Administration	Educating individuals and households on reducing storm water pollution
Administration	Community involvement in the storm water program
Administration	Evaluate the effectiveness of the public education program
Administration	Organize annual cleanup
Illicit Discharge Detection and Elimination (IDDE)	
JCDH/SWMA	Develop MS4 map of outfalls
Administration	Develop applicable ordinances and other regulatory mechanisms
JCDH/SWMA	Screen 15-20% of the outfalls during dry weather conditions
JCDH/SWMA/City Personnel	Illicit discharge source identification
JCDH/Code Enforcement	Elimination of illicit discharges
Administration	Procedures to notify ADEM of a suspect illicit discharge entering the MS4 from an adjacent MS4
Administration	Illicit discharge public reporting system
JCDH/SWMA	Procedures and training for detecting, tracing the source of and eliminating illicit discharge
Administration	Ordinance/Regulatory mechanism availability
Construction Site Storm Water Runoff Control	
Engineering	Site plan reviews
Inspections/Engineering	Site inspection plan
Inspections	Inspection staff training
Inspections	Construction site inspection checklist
Administration	Enforcement Response Plan (ERP)
Administration and Inspections	Construction site operator training
Post-Construction Storm Water Management in New Development and Re-Development	
Administration	Develop applicable ordinances and other regulatory mechanisms
Inspections	Inventory of post construction structural controls
Spill Prevention and Response	
Fire	Spill prevention/spill response plan
JCDH	Spill prevention/spill response training

DEPARTMENT	RESPONSIBILITIES
Pollution Prevention/Good Housekeeping for Municipal Operations	
All Departments	Inventory of municipal facilities
All Departments	Good housekeeping practices SOP
All Departments	Inspection plan
JCDH	Good housekeeping training program
Application of Pesticides, Herbicides, and Fertilizers(PHFs)	
Parks and Recreation	Application and storage of PHFs
JCDH	Annual employee training
Oils, Toxics, and Household Hazardous Waste Control	
Adminstration	Public education on proper disposal
JCDH	Annual employee training
Industrial Stormwater Runoff	
JCDH	Inventory of high risk facilities
JCDH	Inspection of high risk facilities
Wet Weather Monitoring and Reporting	
JCDH	Monitoring locations
JCDH	Impaired waterways review
JCDH	Sampling
Other Requirements	
JCDH	SWMPP plan review and modification
JCDH	Annual Report submittal

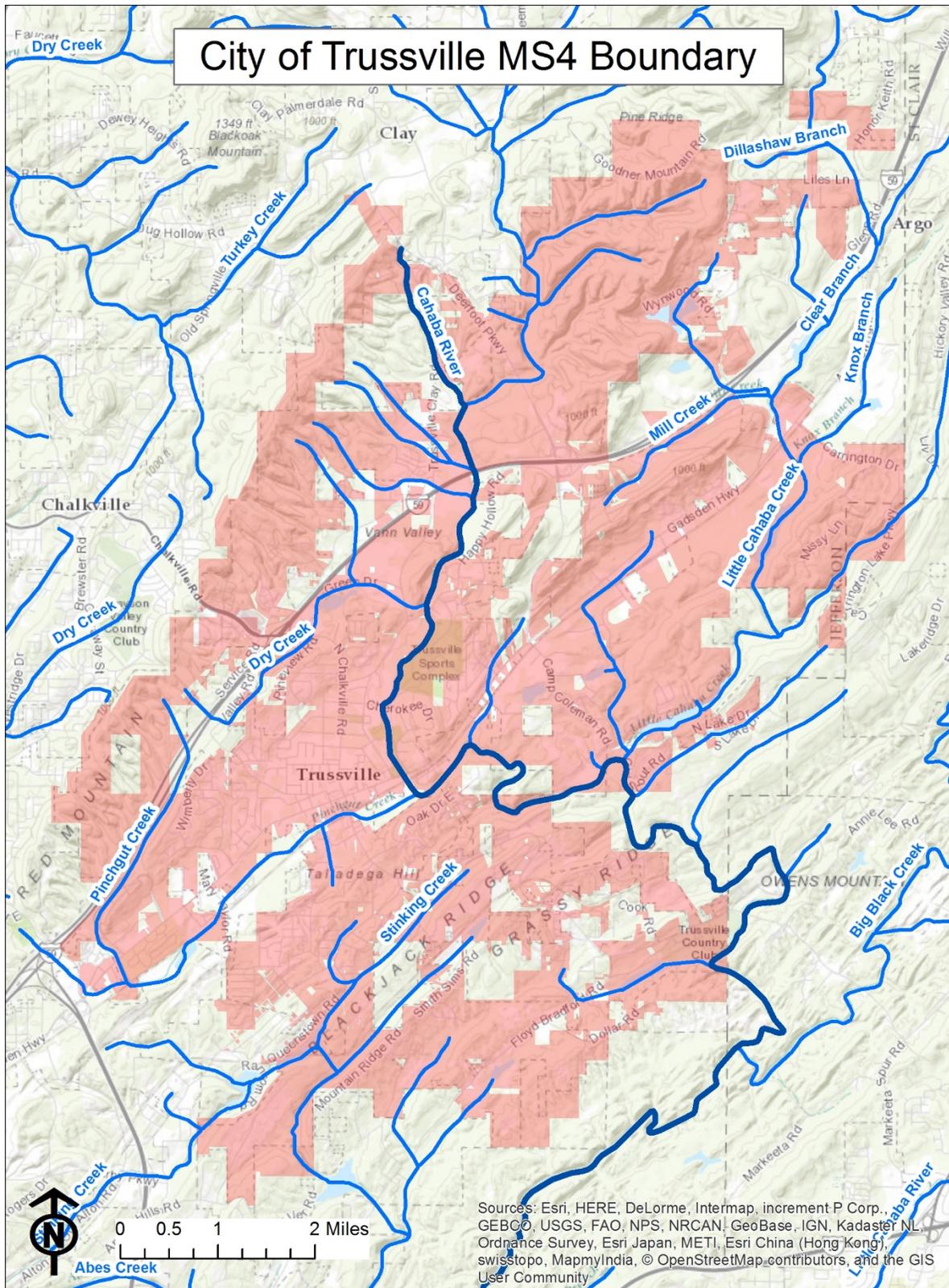


Figure 1: MS4 Boundary

STORM WATER COLLECTION SYSTEMS OPERATIONS

STRUCTURAL CONTROLS MAPPING

The City currently has no owned/maintained structural controls within the MS4 boundary limits.

The City will continue to monitor any addition of City owned/ maintained structural controls.

Responsible Department: Inspections

STRUCTURAL CONTROLS INSPECTION

As stated in the permit, all existing and new structural controls owned/maintained by the permittee shall be inspected using a standard inspection form found in **Appendix B** on a semi-annual basis, at a minimum. While the City does not own/maintain structure controls currently, any future inspections will be done by a city inspector and/or a contractor. Any deficiencies or maintenance recommendations listed on the inspection form in regards to the structural control will be addressed by Public Works.

The City is not responsible for any routine inspection or maintenance for private structures.

Responsible Department: Inspections

STANDARD OPERATING PROCEDURE (SOP) FOR STRUCTURAL CONTROL INSPECTION AND MAINTENANCE PROCEDURES

The standard inspection form found in **Appendix B** is used to document structural control inspections. Once any maintenance is completed, a city inspector and/or a contractor will re-inspect the Structural Control to make sure the structure can effectively function as designed.

Responsible Department: Inspections

STABILIZATION AND RE-VEGETATION OF ERODED AREAS

During the inspection of the structural controls, areas of erosion will be documented. The Public Works Department will receive a copy of the inspection documentation noting the eroded areas and will stabilize and re-vegetate these areas.

Responsible Department: Public Works

FLOATABLES, LITTER, SEDIMENT AND DEBRIS IN STRUCTURAL CONTROLS

All notable floatables, litter, sediment, and/or debris found during the structural inspection will be documented. The Public Works Department will receive a copy of the inspection documentation and will remove the noted items. Public Works will maintain documentation of the estimated amounts of floatables, litter, sediment and debris removed during maintenance activities using the Stormwater Online Activity Record (SOAR) program.

Responsible Department: Public Works

PUBLIC EDUCATION AND PUBLIC INVOLVEMENT ON STORM WATER IMPACTS

DEVELOPMENT AND IMPLEMENTATION OF THE SWMPP

The City will seek public input on the SWMPP by posting the draft SWMPP on Trussville's website for comments. Notification announcements will be made at council meetings.

Responsible Department: Administration

TARGETED POLLUTANT SOURCES FOR PUBLIC EDUCATION

The City discusses targeted pollutant sources in the section of the SWMPP titled "Community Involvement with the Storm Water Program".

REDUCTION OF LITTER FLOATABLES AND DEBRIS

The City currently maintains signage in the right-of-way of _____ road referencing the City litter control ordinance. The City will investigate practical options for identifying and labeling major outfalls with a message that promotes no dumping. The City will also investigate options for installing additional signage, in practical locations, referencing the City's litter control ordinance. Administration will approve the messages and Public Works will install the signs and/or labels.

Responsible Department: Administration and Public Works

EDUCATING INDIVIDUALS AND HOUSEHOLDS ON REDUCING STORM WATER POLLUTION

Currently the City has posted on its website a page describing the Trussville's Stormwater program. The page includes general information about the stormwater permit as well as links and brochures about different ways to reduce stormwater pollution in relation to the different community segments. These same brochures on storm water issues are placed at City Hall for public pickup.

Responsible Department: Administration

COMMUNITY INVOLVEMENT WITH THE STORM WATER PROGRAM

GENERAL PUBLIC

The City will develop a storm water page on its website and place brochures in City facilities with information that informs the general public of:

- General impacts litter has on waterbodies and ways to reduce the litter
- General impacts of storm water into surface water from impervious surfaces
- Source control BMPs in areas of pet waste, home vehicle maintenance, landscaping and rain water reuse.
- Impacts of illicit discharges and how to report them.

The storm water page will be updated as needed.

Responsible Department: Administration

BUSINESSES

The City will include on its storm water page and place brochures in City facilities on the following business-related topics:

- Information on BMPs for use and storage of automotive chemicals, hazardous cleaning supplies, carwash soaps and other hazardous materials.
- Impacts of illicit discharges and how to report them.

The storm water page will be updated as needed.

Responsible Department: Administration

HOMEOWNERS, LANDSCAPERS, AND PROPERTY MANAGERS

The City will include on its storm water page and place brochures in City facilities to inform the homeowners, landscapers, and property managers on the following topics:

- BMPs and storage of pesticides, herbicides, and fertilizers.
- Detention/retention pond maintenance.
- General impacts of storm water from impervious surfaces into surface water.

The storm water page will be updated as needed.

Responsible Department: Administration

ENGINEERS, CONTRACTORS, AND DEVELOPERS

The City will include on its storm water page and place brochures in City facilities to inform the engineers, contractors and developers on the following topics:

- Impacts of increased storm water flows into receiving waterbodies.
- Run-off reduction techniques and low impact development (LID)/Green infrastructure practices. Specifically addressing site design, pervious pavement, alternative parking lot design, retention of forests and mature trees.

The storm water page will be updated as needed.

Responsible Department: Administration

EVALUATING THE EFFECTIVENESS OF THE PUBLIC EDUCATION PROGRAM

The City will evaluate the effectiveness of the public education program by monitoring and reporting the number of visitors to the storm water page annually and the number of brochures that are picked up from the City facilities.

Responsible Department: Administration

PUBLIC AWARENESS ACTIVITIES

The City currently has a Clean Sweep Program that sponsors a two-day litter pickup event and a one-day electronic recycling/destruction and paper shredding day in the month of April. These events are advertised in the local newspapers, on the City website, message boards, and in the monthly City newspaper. During the litter pickup event, volunteers spread out across the City to pick up trash along the road right-of-ways. The number of bags of trash collected during the event is recorded by the City. Items collected during the recycling/destruction and paper shredding day include: computer components, keyboards, mice, cables and wiring, power supplies, printers, copiers, fax machines, scanners, telephones, cell phones, print cartridges, media, tapes, compact discs, battery back-ups, microwaves, washers, dryers, dishwashers, blenders, coffee pots, vacuum cleaners, stereos, speakers, VCRs, radios, irons, hair dryers, curling irons, lamps, fans, cordless tools, rechargeable batteries, and any metal (such as shelving and filing cabinets). The recycling company hired for the event provides a tonnage collected to the City. Also, the paper shredding company hired for the event provides the City with a tonnage of paper collected. Buck Creek is the waterway that benefits from these events. It is anticipated that this program will continue annually.

Responsible Department: Administration

ILLCIT DISCHARGE DETECTION AND ELIMINATION (IDDE)

MS4 MAP

Maps of the major outfalls, structural controls owned/maintained by the City, and waters of the State within the MS4 boundary that receive discharge from the major outfalls can be found in **Appendix C**. Also a list of the major outfalls latitude and longitude coordinates can be found in **Appendix C** and a list of the structural controls latitude and longitude can be found in **Appendix B**.

JCDH will update the MS4 map and provide coordinate location list annually on behalf of the City.

Responsible Party: JCDH

ORDINANCE/REGULATORY MECHANISM

Ordinance 99-013, Erosion and Sedimentation Control: This ordinance was passed in July of 1999 to address erosion and sedimentation from construction sites by establishing regulations, prohibitions, and penalties per NPDES permit number ALS000001. The ordinance does address unauthorized discharges as public nuisances.

The City will review and update this ordinance to conform to the requirements of NPDES permit ALS000015.

Responsible Department: Administration

DRY WEATHER SCREENING PROGRAM

At a minimum, dry weather screening of 15%-20% of the major outfalls will be performed annually with 100 percent of the major outfalls screened at least once per the five year permit period. This work will be done by JCDH. Currently there are no priority outfalls identified within the MS4 boundary, but if during the dry weather inspections, they are identified, they will be screened on an annual basis. JCDH shall use the EPA's guidance manual, *Illicit Discharge Detection and Elimination, A Guidance Manual for Program Development and Technical Assessments*, Center for Watershed Protection, October, 2004, for the main source of investigative techniques and guidance for the dry weather screening process. Outfalls will be field inspected after a minimum of 72 hours of dry weather. Data sheets found in **Appendix C** will be filled out for each outfall inspected.

In addition to the required dry weather screening program, Public Works staff will be trained to recognize and report potential illicit discharges while conducting their day to day operations. Also, all citizen complaints regarding potential illicit discharges will be investigated.

Responsible Party: JCDH

SOURCE IDENTIFICATION

If during the dry weather screenings, Public Works identification, or citizen complaint, an outfall is found to be discharging a liquid, the city inspector or JCDH personnel will traverse upstream of the discharge in an attempt to identify the source of the discharge. If the discharge source is unidentifiable, then a sample of the discharge shall be collected by JCDH and analyzed by a qualified lab. Based on the lab results, the outfall will be prioritized and scheduled for further investigation if needed.

Responsible Parties: City Personnel and/or JCDH

ILLICIT DISCHARGE ELIMINATION

Once the source and responsible party of an illicit discharge has been identified, the City will take action through its pertinent ordinances or JCDH will through its legal duties.

The City will review and update this ordinance to conform to NPDES permit ALS000015.

Responsible Parties: Trussville Code Enforcement Officer or JCDH

ADEM NOTIFICATION BY THE CITY

If a suspected illicit discharge enters the City's MS4 boundary from an adjacent MS4, the City will notify the adjacent MS4 and the ADEM Water Division within 48 hours of observing the suspected illicit discharge. The Standard Operating Procedure for this action is found in Appendix C.

Responsible Department: Engineering

ILLCIT DISCHARGE REPORTING BY THE PUBLIC

The City does not currently have a dedicated way for the individuals to contact the city. The city will work on a way to easily allow the public to report illicit discharges to the city. Currently the plan is to add information to the storm water page and direct citizens to the contact page.

Responsible Department: Administration

PERSONNEL TRAINING

Non-First Responder City Personnel will be trained by JCDH on IDDE identification and response annually.

Responsible Party: JCDH

ORDINANCE/REGULATORY MECHANISM AVAILABILITY

All ordinances and regulatory mechanisms can be found on the City's website, <http://trussville.org/>, or through the link to Municode on Trussville's website .

Responsible Department: Administration

CONSTRUCTION SITE STORM WATER RUNOFF CONTROL

SITE PLAN REVIEWS

Ordinance # 99-013 states that prior to the issuance of any permit for clearing, grading, excavating, filling, or any other activity which may result in soil erosion from water or wind or the movement of sediment from the disturbed property into streets, highways, or waters, the applicant must submit an erosion and sediment control plan with accompanying site plan, which plan is to be reviewed and approved by the Building official or city engineer. No land disturbing activity may be commenced prior to issuance of a permit.

Responsible Department: Engineering

SITE INSPECTION PLAN

The City will perform site inspections on sites that have been issued land disturbance permits in accordance with the frequency requirements of the NPDES permit. Erosion controls and best management practices will be inspected during the site inspections. If there are deficiencies noted, the permit holder will be notified that they did not pass inspection, and will need to correct deficiencies and request a re-inspection.

Responsible Department: Engineering

TRAINING OF MS4 SITE INSPECTION STAFF

City staff responsible for construction site inspections receive QCI training annually.

Responsible Department: Inspections

CONSTRUCTION SITE INSPECTION CHECKLIST

See **Appendix D** for the City's construction site inspection checklist.

Responsible Department: Inspections

ENFORCEMENT RESPONSE PLAN (ERP)

An Enforcement Response Plan is included in Ordinance # 99-013

The City will review and update this ordinance to conform to NPDES permit ALS000015.

Responsible Department: Administration

CONSTRUCTION SITE OPERATOR TRAINING

The City provides construction site operator's informational materials regarding appropriate application and maintenance of erosion and sediment controls when they receive their permits from the Inspections Department. The City will develop a storm water page on its website and have brochures at City facilities that inform the engineers, contractors and developers on:

- Impacts of increased storm water flows into receiving waterbodies.
- Run-off reduction techniques and low impact development (LID)/Green infrastructure practices. Specifically addressing site design, pervious pavement, alternative parking lot design, retention of forests and mature trees.

The storm water page will be updated as needed.

Responsible Department: Administration and Inspections

POST-CONSTRUCTION STORM WATER MANAGEMENT IN NEW DEVELOPMENT AND RE-DEVELOPMENT

ORDINANCE/REGULATORY MECHANISM

The City's Subdivision & Development Regulations addresses storm water design requirements for post-construction storm water management.

The City will review its ordinances, codes, regulations, and procedures regarding post construction storm water management and make revisions as necessary per the permit.

Reviews will specifically consider the following:

- Procedures to develop, implement and enforce systems of appropriate structural and/or non-structural BMPs.
- Procedures to develop, implement and enforce performance standards.
- Procedures for encouragement of the utilization of LID/green infrastructure practices.
- Procedures to ensure compliance with the ordinance or regulatory mechanism including the sanctions and enforcement mechanisms the permittee will use to ensure compliance. If an ordinance mechanism needs to be developed, then the permittee must provide a timeline for the development of the ordinance and/or regulatory mechanism.
- Procedures for post-construction inspections to include tracking and enforcement.
- Procedures to ensure adequate long-term operation and maintenance of BMPs.

The City's Engineering and Inspections Department will have input into the ordinance's creation. Reviews will be completed in Fiscal Year 2018.

Responsible Department: Administration

INVENTORY OF POST CONSTRUCTION STRUCTURAL CONTROLS

The City currently has no publically-owned structural controls. The City will develop a list of privately-owned structural controls for those built after the codification of the new requirements. The City will update annually the list of publicly-owned post construction structural controls and the privately-owned structurally controls under the new requirements.

Responsible Department: Inspections

SPILL PREVENTION AND RESPONSE

SPILL PREVENTION/SPILL RESPONSE PLAN

The City's SOP for spill response is found in **Appendix E**.

Responsible Department: Fire

PERSONNEL SPILL PREVENTION/RESPONSE TRAINING

Trussville Fire Department is responsible for the training and certification of their personnel. An annual training will be provided to municipal personnel on spill prevention/response.

Responsible Party: JCDH

POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

MUNICIPAL FACILITIES INVENTORY

See **Figure 2: Municipal Properties** for a map of municipal properties as well as the locations for vehicle and equipment maintenance facilities. The map shows which department maintains which properties. Generally Parks and Recreation use pesticides, herbicides and fertilizers while Public Works only mows. The map will be reviewed annually and updated if needed. JCDH will compile the data provided by each Department.

Responsible Department: All Departments

GOOD HOUSEKEEPING PRACTICES SOP

The SOP detailing good housekeeping practices are found in the 2011 SWMA SOP Manual. The Manual will be revised in the next year.

Responsible Department: All Departments

INSPECTION PLAN

Annual inspections will be conducted for municipal facilities, to include municipal maintenance shops and equipment yards, for good housekeeping practices, including BMPs. See **Appendix F** for the inspection checklist.

Responsible Department: All Departments

GOOD HOUSEKEEPING TRAINING PROGRAM

City staff will be trained annually on good housekeeping practices as outlined in the SOP manual.

Responsible Party: JCDH

APPLICATION OF PESTICIDES, HERBICIDES, AND FERTILIZERS (PHFS)

APPLICATION AND STORAGE

The Park and Rec keeps annual records of pesticide, herbicides, and fertilizers (PHFs) used at municipal facilities. Each chemical used is applied per the labeling instructions. Material safety data sheets (MSDS) on each product are found in the chemical storage areas. City staff responsible for application of PHFs receives annual training in safe use, storage, and disposal of PHFs. All contractors contracted to apply pesticides or herbicides to City property shall provide proper certification and licensing before performing work. Also, contractors contracted to apply fertilizer must provide qualification in utilizing proper nutrient management practices.

City facilities that store PHF will be inspected annually to determine proper storage, product labeling, and MSDS accessibility.

Responsible Department: Parks and Recreation

PHF TRAINING PROGRAM

City staff will be trained annually on PHFs as outlined in the SOP manual.

Responsible Party: JCDH

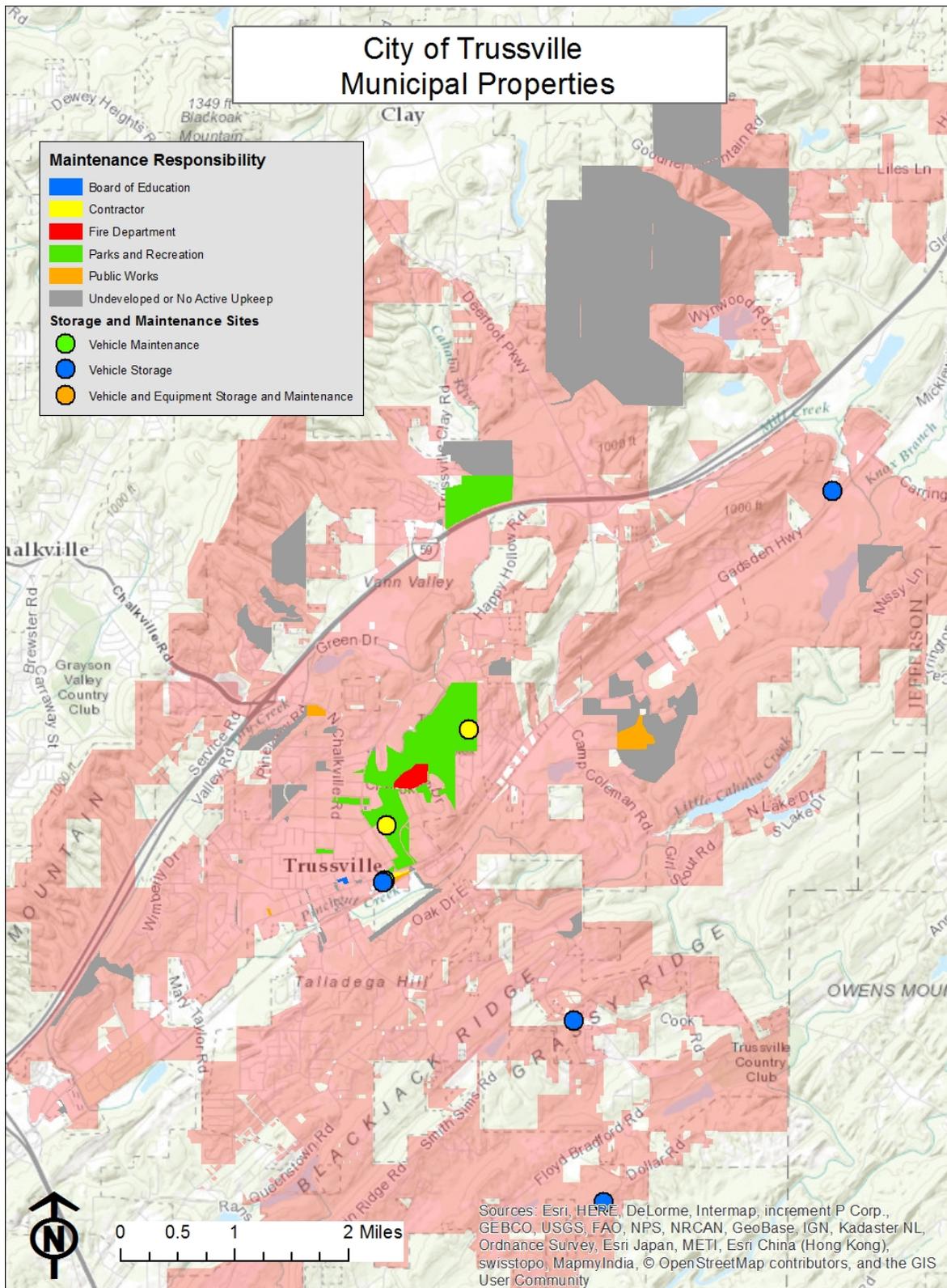


Figure 2: Municipal Facilities

OILS, TOXICS, AND HOUSEHOLD HAZARDOUS WASTE

PUBLIC EDUCATION ON PROPER DISPOSAL

The city currently has on their website an SOP on how citizens should report spills, illicit discharges and improper disposals.

The City also provides a list of facilities in the area that accept used oil on the storm water website. Brochures on oils, toxics, and household hazardous waste are on the City storm water website as well as placed in City facilities for public pick-up.

Responsible Department: Administration

ANNUAL EMPLOYEE TRAINING

Annual training on spill prevention is provided to City personnel by JCDH.

Responsible Party: JCDH

INDUSTRIAL STORM WATER RUNOFF

INVENTORY OF HIGH RISK FACILITIES

The City maintains a list of industrial and high risk facilities within the city limits, see **Appendix G**. This list is updated annually.

The list of industrial facilities be reviewed annually for completeness and accuracy and will be updated when necessary. A map of the industrial and high risk facilities can be found in **Figure 3: Industrial and High Risk Facilities**.

Responsible Party: JCDH and Administration

INSPECTION OF HIGH RISK FACILITIES

JCDH will inspect these sites annually on behalf of the city. See **Appendix G** for the Industrial Inspection form.

Responsible Party: JCDH

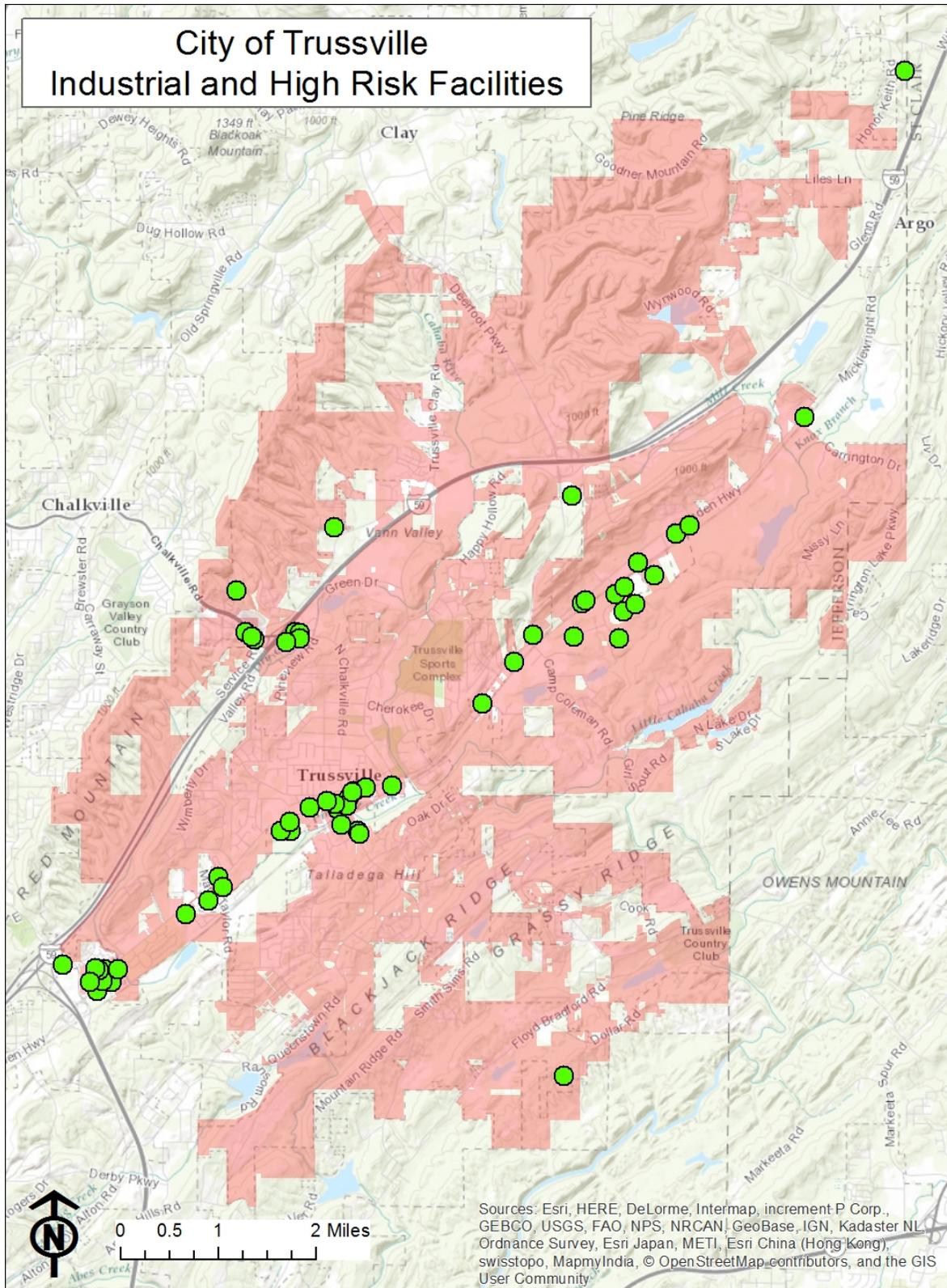


Figure 3: Industrial and High Risk Facilities

WET-WEATHER MONITORING AND REPORTING

MONITORING LOCATIONS

JCDH will take wet-weather grab samples at sites on Dry Creek, Pinchgut Creek and the Cahaba River twice during the first permit year and once every year after on behalf of the City. See **Figure 4: Trussville Sampling Sites** for a map of the sampling sites

The site locations are as follows:

Water Body	Latitude, Longitude	Description
Dry Creek	33.645698, -86.604021	Grab Sample
Pinchgut Creek	33.616913, -86.606284	Grab Sample
Cahaba River (Civitan Park)	33.622980, -86.599946	Grab Sample
Cahaba River (Whites Chapel)	33.605176, -86.549304	Water Quality Sonde Site

An hourly water quality sonde will be placed on the Cahaba River. The sonde will be managed by the United States Geological Survey (USGS). The site's title is USGS 02423160 Cahaba River Near Whites Chapel AL. The site for the Cahaba River sonde was originally planned to be located at Civitan Park but after discussions with USGS about the extreme low flow levels at Civitan Park, Whites Chapel was then selected.

Responsible Party: JCDH

IMPAIRED WATERWAYS

The City will review the waterbodies listed in the latest final §303(d) list, annually. If a waterbody becomes listed that falls within the MS4 boundary, the SWMPP will be updated as needed.

Responsible Party: JCDH

MONITORING PARAMETERS AND FREQUENCY

Grab samples will be analyzed for the following parameters:

- a. E.Coli
- b. Total Nitrogen (TN) (mg/l)
- c. Total Phosphorus (mg/l)
- d. Total Suspended Solids (TSS) (mg/l)

- e. Temperature
- f. pH/ORP
- g. Turbidity (NTU)
- h. Conductivity
- i. Dissolved Oxygen (mg/l)
- j. Ammonia Nitrogen (NH₃-N) (mg/l)
- k. Biochemical Oxygen Demand (BOD) (mg/l)
- l. Chemical Oxygen Demand (COD) (mg/l)
- m. Hardness as CaCO₃ (mg/l)
- n. Nitrate plus Nitrite Nitrogen (NO₃+NO₂-N) (mg/l)
- o. Oil and Grease (mg/l)
- p. Total Dissolved Solids (TDS) (mg/l)
- q. Total Kjeldahl Nitrogen (TKN) (mg/l)

The water quality sonde will monitor the following parameters at least hourly:

- a. Temperature
- b. pH/ORP
- c. Turbidity (NTU)
- d. Conductivity
- e. Dissolved Oxygen
- f. Water level

Responsible Party: JCDH

SAMPLE TYPE, COLLECTION AND ANALYSIS

JCDH will collect grab samples and run the sample analysis.

Responsible Party: JCDH

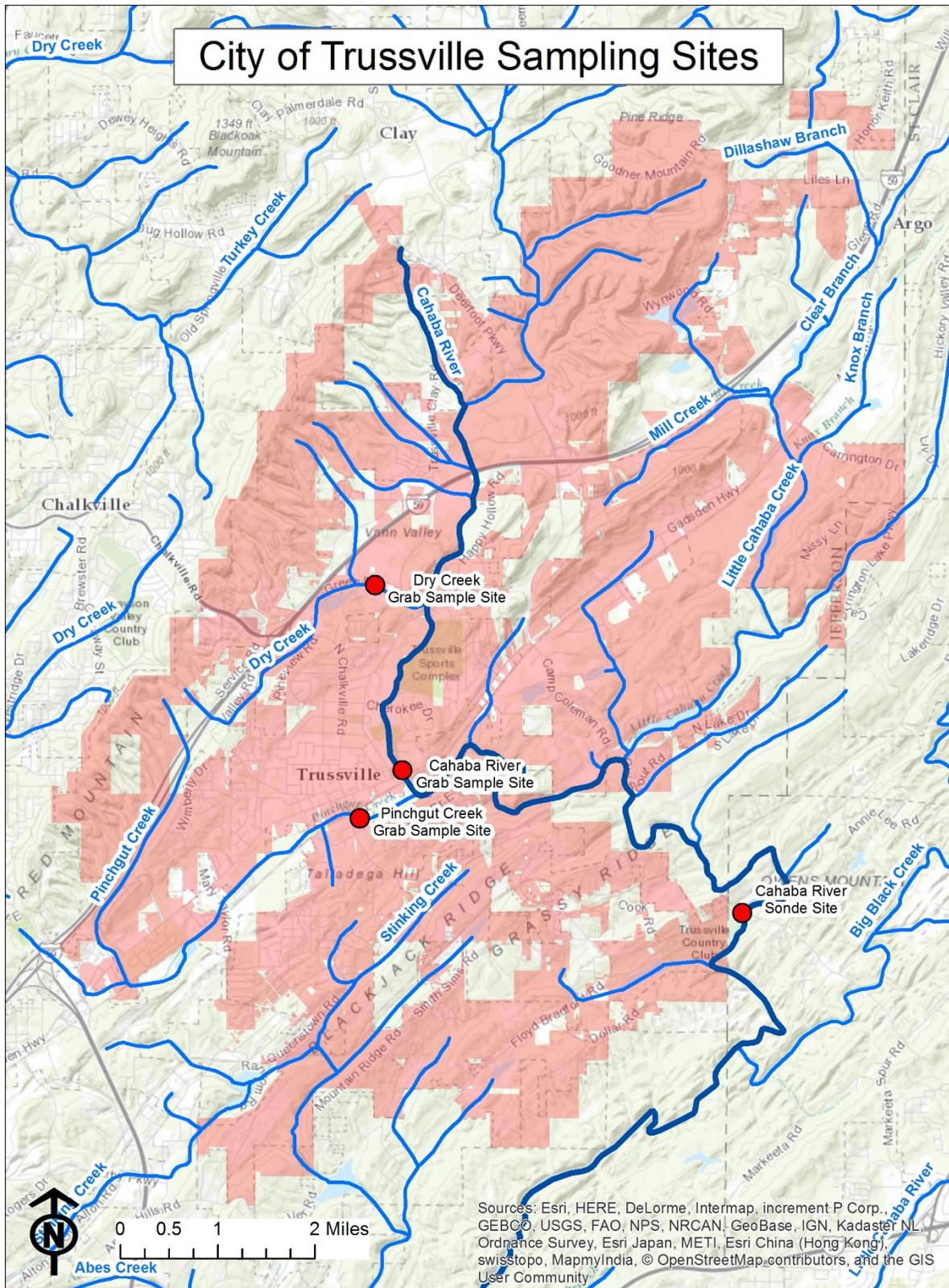


Figure 4: Trussville Sampling Sites

OTHER REQUIREMENTS

SWMPP PLAN REVIEW AND MODIFICATION

This plan will be reviewed annually and updated as necessary.

Responsible Department: All Departments

ANNUAL REPORT

The Annual report will be compiled by JCDH for the city of Trussville

Responsible Party: JCDH