Chapter 1 - Introduction

Program Overview

This document presents the City of Leeds Storm Water Management Program (SWMP) as required by the Alabama Department of Environmental Management's (ADEM) National Pollutant Discharge Elimination System (NPDED) Phase II Municipal Separate Storm Sewer System (MS4) Permit. This document is to be used in conjunction with the City's Stormwater Standard Operating Procedure - https://library.municode.com/al/leeds/munidocs/munidocs?nodeId=2697d7e7db503 and the City's Post Construction Ordinance https://library.municode.com/al/leeds/munidocs/munidocs?nodeId=2697d7dab83d2 When the phrase "SOP" is used, the reader should reference the Stormwater SOP document and when the phrase "Post Construction SOP" is used the Post Construction Ordinance should be referenced for granular information.

All MCM measures will be performed to the maximum extent practicable.

This permit covers stormwater discharges from regulated small municipalities. The overall goal of the program is to protect water quality by an effort to reduce, the discharge of pollutants in stormwater

Regulatory Background

In 1990, the Environmental Protection Agency (EPA) promulgated regulations establishing Phase One of the NPDES stormwater 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 more to implement a stormwater 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 program. The Phase Two program extends coverage of the NPDES stormwater program to regulated "small" MS4s. A regulated small MS4 is located within an "urbanized area" as defined by the Census Bureau or as designated by the NPDES permitting authority. The ADEM presently has primary jurisdiction over permitting and enforcement of the stormwater program for Alabama. On September 6, 2016, ADEM issued the MS4 Phase II General Permit NPDES Permit Number ALR 040000 valid on October 1, 2016, for stormwater discharges associated with small MS4s.

Area

The City of Leeds is located at the convergence of the three counties, Jefferson, St Clair, and Shelby counties. Traditionally, the City had social and economic ties to Jefferson County and the City of Birmingham; however, that fact is undergoing a paradigm shift with social and economic activity gravitating to Shelby and St. Clair Counties. The City is small, less than 22 square miles of territory, and located in the foothills of the Appalachian Mountains. Its developed land lies in a valley west of Oak Ridge Mountain.

The Last 50 years have seen the city shift from a heavy industrial city to a bedroom community with manufacturing being a ghost of its former self.

Legal Authority

The City of Leeds was incorporated in 1887. As an incorporated city, Leeds has the legal authority to create land use and design regulations for developments within the City limits.

Water Quality Concerns

The City of Leeds is in Cahaba Water Shed and has limited outfalls with the Cahaba River, with the Little Cahaba River being the primary receiving waters for the City. The Little Cahaba River is a 303d body for total dissolved solids primarily from Industrial processes. (It should be noted that at the time of this report that only one (1) significant heavy-industrial facility remains operating in the watershed to the Little Cahaba River). As the City transitions to a post-industrial community to a bedroom community, a shift in the challenges to water quality is occurring.

A. Discharge Compliance with Water Quality Standards

The General Permit requires, at a minimum, the permittee to develop, implement, and enforce a stormwater management program designed to reduce the discharge of pollutants to the maximum extent practical. Full Implementation of BMP's using all known, available, and reasonable methods of prevention, control, and treatment to prevent and control stormwater pollution from entering waters of the State of Alabama is considered an acceptable effort to reduce pollutants from the MS4 to the maximum extent practical.

Chapter 2 - SWMP Program Management

2-1 SWMP Plan Implementation Responsibilities

Although the Zoning Administrator is the lead implementer of the SWMP, no single department within the City is responsible for all necessary activities. Therefore, multiple departments and agencies have a role in program management. They are:

- The City Council
- City of Leeds, Mayor's Office
- City of Leeds Development Services
- City of Leeds Public Works Department/Recreation & Parks
- City of Leeds Fire Department
- Leeds Water Works

The relationships between the departments and the following discussion are dependent upon the solidification of each Department's responsibilities during program development.

A. City of Leeds City Council

The City Council is responsible for the promulgation of all City resolutions and ordinances and the approval of budgetary expenditures related to the Storm Water Management Program's implementation.

B. Mayor's Office

The Office of the Mayor is responsible for oversight and maintaining communication with the City Council.

C. Public Works - Environmental Programs-Flood Plain Management

The Development Department will, to the maximum extent practical, lead the day-to-day activities and administration of the program, with substantial assistance and input from other departments as depicted in this plan. The Building Official will, to the maximum extent practical, take the lead in assuring that MS4 training occurs Citywide. The Inspections Department will, to the maximum extent practical, assist with floodplain management, illicit discharge detection and elimination, construction site runoff control, post-water management, and training within the good housekeeping for municipal operations MCM.

D. Public Works/Recreation & Parks

Public Works Department will, to the maximum extent practical, have a role in several of the Minimum Control Measures (MCM's), including public education, illicit discharge detection, and elimination. Also, the Public Works Department is responsible for City-owned and maintained grounds and landscaping and will, to the maximum extent practical, be mostly responsible for the Pollution Prevention/Good Housekeeping for Municipal Operations MCM.

E. Fire Department

The Fire Department provides a support role through hazardous waste spill reporting and cleaning techniques. The responsibilities include public education, illicit discharge detection, and elimination and pollution prevention and good housekeeping.

F. Leeds Water Works

The Leeds Water Works will, to the maximum extent practical, assist in the Development and educational part of the Permit through its public education program. The Water

Works will, to the maximum extent practical, also assist in sampling and analyzing the stormwater.

Coordination between Local MS4s

The City does anticipate sharing some of the efforts in implementing various Minimum Control Measures (MCM) of the Permit, such as Education Outreach and Public Participation. This coordination will, to the maximum extent practicable, be voluntary and allow for cost-effective implementation of particular program MCMs.

SWMP Revisions and Updates

As part of the annual review of the SWMP in conjunction with the preparation of the annual report, all revisions and updates required by ADEM or necessary to maintain permit compliance will, to the maximum extent, practicable and to submit to the Department for review. Upon approval of the revisions and updates, the modified SWMP plan will, to the maximum extent practical, become active.

Chapter 3 - Program Elements

This chapter guides staff and others to meet the requirements of the ADEM general permit for stormwater discharges from the MS4.

The six minimum control measures (MCM) are:

1. Public Education and Outreach

2. Public Participation/Involvement

3. Illicit Discharge Detection and Elimination

4. Construction Site Runoff Control

5. Post Construction Storm Water Management's in New Development and Redevelopment

6. Pollution Prevention/Good Housekeeping for Municipal Operation

The following sections in this chapter will, to the maximum extent practical, detail the MCM with the following criteria for each MCM:

• Permit Requirements

• Target Audiences

• Target Pollutant Sources

• Outreach Strategies

• Goals and Timelines

• Evaluation Techniques

Public Education and Outreach (MCM 1)

Permit Requirement

The Permit has required the City to implement and evaluate a public education/outreach and public involvement program that distributes educational materials to the community or conducts equivalent outreach activities about the impacts of polluted discharges on water bodies and the steps that the public can take to reduce pollutants in stormwater runoff to the maximum extent practical. This measure requires the City to create a forum for which the public may insert its involvement into the planning and implementation of the program.

Target Audiences

MCM 1 includes various target audiences. Residential, commercial, and industrial developers are involved in SMWP development. The public, schools, elected officials, developers, contractors, and professional groups will, to the maximum extent practicable, is targeted for ongoing involvement in the SWMP implementation and evaluation. Federal, State, and other local agencies will, to the maximum extent practicable, is included in these processes. Educational materials will, to the maximum extent practicable, is specifically tailored to communicate a specific stormwater pollutant concern to a targeted audience.

Target Pollutants and Sources

MCM 1 will, to the maximum extent practical, target non-point source pollutants found in stormwater. These pollutants include but are not limited to, sediment, trash, fertilizers, pesticides, oils, and greases. The sources that arc targeted include, but are not limited to, illegal dumping, pool water disposal, car washing, home auto repair, failing septic systems, illicit discharges, impacts from Development, construction site erosion, commercial parking lot runoff and improper application of fertilizers, pesticides, and herbicides.

Some of the target sediment sources may include:

• Residential developments

• Commercial developments

• Construction site erosion

Outreach Strategies, Goals and Timelines

The City employs a variety of strategies for MCM 1 from the utilization of existing materials from other agencies and permittees to provide materials to educate the targeted audiences. Some of the City's current and future compliance activities include:

Brochures, pamphlets, Environmental Webpage, Centralized Recycling, Watershed Signage & Environmental Awareness Signage, Storm Water Board, and Elected Officials Training. These strategies will, to the maximum extent practical, present best management practices that are effective in reducing the impacts of pollutants on stormwater runoff. Each outreach strategy will, to the maximum extent practicable, be detailed below, along with its goal, timeline, and Department responsible for the implementation of the measure.

A. Create Storm Water Education Outreach Brochures- Pamphlets:

Current Program**:**

This element of the MCM (1) will, to the maximum extent practical, allow for the distribution of new and existing stormwater education brochures and pamphlets for targeted groups, such as:

Erosion and sediment control brochures for contractors working in the City, flyers for presentations given to schoolchildren, electronic postings targeting residential activities to homeowners.

Advertisements utilized to date are:

Green scaping
Green up your Lawn, not Lakes
Household Hazardous Waste
Water Efficient Landscape
Stormwater Placements – Kids
Make your home the solution to water pollution
Stormwater Pollution found in your area – Flyer
Clean Water
After the Storm

The brochures are distributed with every permit/license issued by the City, may be found at the front counter of city hall, posted to our website, and one (1) distributed at city festivals.

You may view the brochures at
https://admin.municode.com/munidocs/31128?nodeId=26a1570220f3d

Potential Target Audience: Contractors, Developers, Elected Officials, Public, Homeowners, Landscapers, and Schools

Measurable Goals:

The City will, to the maximum extent practical, maintain a list of existing EPA and other stormwater educational brochures and pamphlets that make up this element of the MCM 1. The distribution methodology is by electronic, i.e., social media, web platforms, and other appropriate paths.

Throughout the permit period, erosion and sediment control brochures detailing effective BMPs to reduce sediment impacts to stormwater will, to the maximum extent practicable, be distributed electronically to all residential home builders licensed in the City.

Additionally, the City will, to the maximum extent practical, create one additional stormwater brochure a year with a specific target audience.

Responsible Department: Environmental Programs

B. Environmental Web Page:

Current Program:

The Internet provides a very accessible means for making information and data available to citizens. The City's web site features an Environmental Outreach page which has a link to the City's SWMPP, MS4, Annual Report, and other stormwater-related topics, as well as provide information on any current and future stormwater-related activities.

Potential Targeted Audience: Public

Measurable Goals:

The City will, to the maximum extent practical, continue to maintain an environmental outreach page on its website and post links to its SWMP and Annual Report on the site. The City will provide via its website stormwater-related topics, information about the stormwater management programs, upcoming program events, information about how readers can reduce stormwater impacts, and links to other related websites.

Responsible Department: Environmental Programs

C. Workshops

Current Program:

Seminars/Training are useful in educating a specific target audience about specific topic issues. Using existing training programs, the City will work to encourage stakeholders, public and contractors, to attend workshops in various stormwater topics for homeowners and the professionals. Examples of some potential workshops include but are not limited to the following: Nonpoint Education for Municipal Officials (NEMO), Rain Barrel, Erosion and Sediment Control, Stream Restoration, Invasive Species Control, and Low impact Development (LID)/Green Infrastructure (GI) Workshops. The City requires that all contractors be QCI certified, thus mandating their participation in various workshops and training programs.

Potential Targeted Audience: Contractors, Developers, Elected Officials, Homeowners, Landscapers, and Professionals.

Measurable Goals:

The success of the program will is measured by the number of contractors who present achieve QCI status.

Responsible Department: Environmental Program:

D. Centralized Recycling

Current Program:

All recycling programs are a benefit to stormwater management because they reduce a potential pollutant source by reducing, recycling, and reusing.

Potential Targeted Audience: Homeowners

Measurable Goals:

Throughout the permit cycle, the City will encourage citizens to use the recycling available through its contracted waste company, the city bulk waste program, and its centralized recycling center. Environmental Programs will, to the maximum extent practical, request data from the contractor and its in-house bulk waste program about the quality of recycled goods collected and report the data in the annual report. Increasing yearly totals will, to the maximum extent practical, reflect the achievement of goals. Recycling Dumpsters are provided at 8475 1st Ave. Leeds.

Responsible Departments: Environmental Programs

F. Watershed Signage & Environmental Awareness Signage

Current Program:

Watersheds are a logical way to think about the connection between the land and the quality of water we enjoy. How we manage and treat the earth has a direct impact on water's ability to support vital public uses like swimming, fishing, aquatic species habitat, and a clean drinking water supply. Watershed signs increase public awareness about the importance of watersheds and encourage good stewardship of our vital streams. Wetlands, lakes, and groundwater.

Potential Targeted Audience: Public

Measurable Goals:

Throughout the year, the City will inspect and maintain existing environmental awareness signage. The Signage used by the city are manhole lids in which the message is cast on the surface – the permenance of this signage has proven to be the most durable method of

communicating our messaging) Throughout the permit cycle, Environmental Programs will require developers to place signage on stormwater inlets. This installation of these lids varies as new inlets are installed or as manhole lids fail or are stolen. The new messages was installed on eight (8) inlets in 2019.

Responsible Departments: Environmental Programs

G. Elected Officials Training:

Current program:

Since elected officials are responsible for approving resolutions and ordinances that guide the implementation of the City's SWMP and also have budgetary control, it is imperative to expand their knowledge of stormwater management.

Potentials Targeted Audience: Elected officials

Measurable Goals:

The City will sponsor one NEMO workshop every permit cycle.

Responsible Department: Environmental Programs

Evaluation

The evaluation of a public education and outreach program is quantified by the number of contacts, participation in programs, and website hits.

Public Involvement/Participation (MCM 2)

Permit Requirement

Public Participation/Involvement MCM 2 requires the City to develop, implement, and evaluate a public participation program centered on the SWMP and the annual report. Open discussion regarding water quality issues occur at each instance that a development is proposed in the city as its impact on water quality is a part of the permitting process. Discussions and lessons learned from the installation of a project or development allow the public to weigh in on the effectiveness of the ordinance. Once approved, the SWMP is available to the public on the City's website.

Target Audiences

MCM 2 includes various target audiences. Residential, commercial, and industrial developers, contractors, and professional groups will, to the maximum extent practicable, be targeted for ongoing involvement in the SWMP implementation and evaluation. Federal, State, and other local agencies will are included in these processes.

A. Storm Water Board:

Current Program:

During 2016 the City formed a Storm Water Board for the express purpose of advising the City Council in matters related to Storm Water Management. The Board is required to meet at least once each January at a minimum and as needed for the rest of the year. The Board serves various roles for the City from annual review of the SWMP, if needed, to environmental ordinance review and promulgation, as it needed. City staff provides the board with feedback on the performance on the plan for its use. The committee also assists the City in applying for Federal and State grant monies to support its efforts in stormwater management through each of the MCM.

Measurable Goal:

The Board has one (1) required meeting per year. During this session, the City's SWMP may be reviewed and updated, if needed, to maintain permit compliance.

Responsible Departments: Environmental Programs and Public Services

B. Watershed Organizations:

Current Program:

The City works with other permittees to build relationships to achieve permit goals.

Measurable Goal:

Throughout the permit period, the City will work with groups within the City who have an interest in pollution prevention. These parties are encouraged to meet with the City Council, Planning Commission, or Stormwater at any time. As part of the city's litter and bulk waste program, we partner with the faith-based community many times during the year to seek volunteers and their effort in pollution reduction.

Responsible Department: Environmental Programs-Flood

C. City Festivals

Current Program:

City Festivals will function as an opportunity to educate citizens on all aspects of the water cycle and other related natural resources. This effort also instills in the students a general environmental awareness and stewardship as well as specific coastal issues and protection strategies. Festivals will include citizens of all ages and from various communities within and outside the city.

Measurable Goal:

The incidents of contact with the public serves as the measure for this goal.

Responsible Department: Environmental Programs

D. Keep Leeds Green and Clean Program

Current Program:

The City mandates garbage pickup for its citizens and provides bulk waste pickup. Citizens are permitted to dispose of any material except putrescible garbage, hazardous chemicals, and tires as part of the bulk waste program with two (2) pickups each month.

Measurable Goal

Through the duration of the permit cycle, City staff will offer the bulk waste pickup every month. It will take the necessary enforcement actions against those who violate city littler laws.

The City will work with other interested parties to sponsor/and or assist with a household hazardous waste day.

Responsible Department: Environmental Programs and Public Services

G. Comprehensive Plan

Current Program:

The City has adopted a Comprehensive Plan. The City seeks public input through meetings with the general citizens, public officials, City staff, the Planning Commission, and various other entities regarding many topics, including stormwater pollution. This information is incorporated into the plan, which serves as guidance for future development within Leeds. There were at least four guiding principles or mission statements outlined in the document. They are listed below:

1. To continually confirm our purpose as the "Preferred Community in North Central Alabama" by providing superior educational facilities and opportunities so that Leeds children may remain nationally competitive graduates.

2. In the provision of protection services, provides infrastructure and cultural opportunities so that Leeds residents receive the highest quality of living possible.

3. Maintain vigorous citizen's oversight of local activities to ensure that opportunities for the continuous improvement in the provision of services, facilities, and resources.

4. Foster an atmosphere that stimulates economic growth and attracts quality industry through adequate transportation facilities, a stable and active business environment, a skilled and educated workforce, and a strong customer base.

These principles tie directly to stormwater pollution mitigation effects. If the City is to offer its residents a high standard of living, pollution must be eliminated.

This document is available on the City website.

Measurable Goals:

Within the permit cycle, the Comprehensive Plan would be reviewed by the Environmental Advisory Committee (if created), and the committee will, to the maximum extent practicable, make recommendations for the future update.

Responsible Departments: Environmental Programs and Planning Commission

Illicit Discharge Detection and Elimination (IDDE) (MCM 2)

EPA defines illicit discharges into a storm drain system as" .... any discharge to an MS4 that is not composed entirely of stormwater..." Some exceptions include but are not limited to permitted industrial sources and discharges from firefighting activities. Some examples of illicit discharges include sanitary wastewater, car wash, laundry, wastewaters, etc. These illicit discharges can enter a storm drain system either through a direct connection or indirectly by spills, dumped materials, and cracks in pipes. As a result, inadequately treated waste containing high levels of pollutants entering stormwater.

Permit Requirement

The Illicit Discharge Detection and Elimination (MCM 2) requires the City to develop, implement, enforce and evaluate a program to detect and eliminate illicit discharges and improper disposal, including spills not under the purview of another responding authority, into the City's regulated MS4 area, to the maximum extent practical. The program must include the following:

1. Annually update the stormwater infrastructure inventory map, showing the locations of all outfalls and the names and locations of all State waters that receive discharges from those outfalls; structural BMPs owned, operated, and maintained within the boundaries of the City's MS4 area. To the extent allowable under State or local law, effectively prohibit, through an ordinance, or other regulatory mechanisms, non-storm water discharges into the ms4 and implement appropriate enforcement procedures and actions. The ordinance shall be reviewed on an annual basis and updated when necessary.

2. The City of Leeds utilizes the authority of the Stormwater Ordinance and the processes described in the SOP Manual to detect and eliminate IDDE issues. Please see the Stormwater Ordinance and SOP Manual links at the top of this document.

Exclusions

The Illicit Discharge Detection and Elimination MCM include measures to control illicit discharges and improper disposal of wastes into stormwater. In the execution of this element, the City of Leeds will, to the maximum extent practical, exclude the following

categories of none stormwater discharges that are not required to be addressed by the State:

1. Water Line Flushing

2. Landscape Irrigation

3. Diverted Stream Flows

4. Rising Ground Watersheds

5. Uncontaminated groundwater infiltration

6. Uncontaminated Pumped Groundwater

7. Discharges from Portable Water Sources

8. Foundation Drains

9. Air Conditioning Condensation

10. Irrigation Watersheds

11. Springs

12. Water from Crawl Space Pumps

13. Footing Drains

14. Lawn Watering

15. individual Residential Car Washing

16. Flows from Riparian Habitats and Wetlands

17. De-chlorinated Swimming Pool Discharges

18. Fire Fighting Flows

Target Audiences

MCM 2 includes various target audiences: Residential, commercial, and industrial developers participating in SMWP development. The public, school, elected officials, developers, contractors, and professional groups will, to the maximum extent practicable, be targeted for ongoing involvement in the SWMP implementation and evaluation. Federal, State, and other local agencies will be included in these processes as well.

Target Pollutants and Sources

MCM 2 will, to the maximum extent practical, target non-point source pollutants found in stormwater. The pollutants include but are not limited to, sediment, paints, fertilizers, pesticides, swimming pool discharges, pathogens, oils, and greases. The sources targeted include, but are not limited to, illegal dumping, failing septic systems and illicit connections, illicit swimming pool connections, unpermitted construction site discharges, improper disposal of fertilizers, pesticides, herbicides, and paints, etc.

The City of Leeds appoints the Water Board members who are responsible for their ADEM permit. However, the City and Leeds Water Works have a symbiotic relationship and work together to achieve compliance with all environmental permits.

Outreach Strategies, Goals and Timelines

The City will, to the maximum extent practical, employ a variety of strategies for MCM 2 from the creation and enforcement of ordinances to education outreach. The City's goal is to reduce illicit discharge to our MS4 to the maximum extent practical for implementation of the measure.

A. Compiling and Organizing Existing City's Storm Water Infrastructure Data

Current Program:

This element of MCM 2 will, to the maximum extent practical, involve staff locating all existing stormwater infrastructure data in GIS format, manipulating it into more usable software, and creating new maps. Currently, the City is mapping the location of existing stormwater outfalls that discharge to state waters.

Measurable Goal:

The City has mapped all existing and known stormwater outfalls that discharge to state waters of the Little Cahaba.

The database allows for the addition of new outfalls submitted as projects or development come online.

Responsible Department: Environmental Programs

Perform Field Assessments and Site Inspections

Current Program:

Field assessments are observations made during the daily duties of the development department. Site inspections include field visits outside of an employee's regular duties in response to reports of potential noncompliance or program directives. The process for field personnel to document and report stormwater discharges that are potentially in violation of the IDDE regulations (Please see SOP Manual). This process includes reporting potential violations to the appropriate City staff. Trained City personnel perform water quality inspection procedures, internal processes, and general stormwater

quality practices. Currently, City staff routinely inspect stormwater infrastructure. Team members also respond to notifications of potential illicit discharges from the public and other agencies. To reduce the number of pollutants in runoff, City crews regularly perform maintenance and cleaning on roadways, ditches, culverts, grounds, parks, and channels. These practices will, to the maximum extent, practicable, is described and recognized in parts of the program.

Measurable Goals:

The City will:

1. Designate responsible personnel within departments for field assessments and site inspections.

2. Develop procedures for the implementation of reporting/inspection and enforcement.

The City will, to the maximum extent practical:

a) Educate the public and commercial and industrial developments on hazards associated with illegal discharges.

b) Initiate necessary field assessments to establish priority areas for more focused inspections. Conduct focused area inspections during 2019.

c) Respond per established procedures to all identified and reported potential illicit discharges and connections.

d) To collect and review data regarding enforcement activities in 2021, as part of the annual report, identify the principal pollutants, and plan for future action to address that pollutant.

Responsible Departments: Environmental Programs, Fire Department, Public Works, and the Leeds Water Works Board.

C. Hazardous Materials Response Program

Current Program

The stormwater program will, to the maximum extent practicable, coordinate with the existing hazardous materials response program operated by the City's Fire Department.

The Public Works Department and other entities that coordinate with the hazardous materials response program and will, to the maximum extent practical, assist in this effort.

Leeds Fire Department currently operates an existing hazardous-materials response program in coordination with Jefferson, Shelby, and St. Clair County Emergency Management Offices.

Measurable Goals:

In 2017, the City will, to the maximum extent practical:

1. Meet with the Fire Department to develop and implement strategies for incorporating stormwater pollution prevention practices into the hazardous materials response program.

2. Monitor location, frequency, and type of response events and report information in the Annual SWMPP report.

Throughout the permit period:

3. Establish a section on the Environmental Web Page for Public inquiries and Reports r regarding illicit discharges.

4. Advertise IDDE information on the City Webpage. in educational brochures/flyers and through local media, receive, respond, and report appropriately to all reported events or inquiries fielded from the public.

Responsible Departments: Environmental Programs, Fire, Police and Public Works

D. Train City Staff

Current Program:

This element's goal is to assure that City staff are trained to understand stormwater issues and to recognize and report illicit discharges and connections while performing their regular duties in the field. Training will, to the maximum extent practicable, is provided to hazardous materials response teams, public works, and other employees. These training sessions occur in conjunction with other training elements of the program.

Measurable Goals:

The City will, to the maximum extent practical:

a) Provide a training presentation for new hires on fundamental stormwater issues.
b) Provide training for new hires on IDE, the City will, to the maximum extent practical,
c) Provide one general stormwater training sessions annually for new employees involved in the program.
d) Provide specific training yearly for all employees with program responsibility such as street, and mowing crews.

Responsible Departments: Environmental Programs, and Public Works

Evaluation

The evaluation of an MCM 2 program is measured by the goals that it meets. At the permit year-end, the City will, to the maximum extent practical, evaluate MCM 3's effectiveness by assessing the success of the goals that are meet.

Construction Site Storm Water Runoff (MCM 3)

Permit Requirement

The Construction Site Storm Water Runoff Control (MCM 3) requires the development, implementation, and enforcement of a program to reduce the pollutants in any stormwater runoff to the MS4 from construction activities. The Permit requires that a total land disturbance of greater than or equal to one acre and activities that disturb less than one acre but are part of a larger joint plan of Development or sale that would disturb one acre or more. ADEM terms these sites as qualified construction sites.

See Ord:
https://library.municode.com/al/leeds/munidocs/munidocs?nodeId=26c21aab02279

Target Audiences

MCM 3 will, to the maximum extent practical, target developers, contractors, home builders, and professional consultants. MCM 3 will, to the maximum extent practicable, include the training of City staff from the Building Department. Federal, State, and County agencies will, to the maximum extent practical, participate through coordinated efforts within the program.

Targeted Pollutants and Sources

MCM 3 targets construction sites for erosion and sediment control. Other potential targeted pollutants and sources are petroleum, oils, and greases from equipment storage areas, pathogens from lack of portable facilities, and pH changes through concrete washouts.

Outreach Strategy, Goals and Timeline

The City employs a variety of strategies for MCM 3 from training City building inspectors to implementing and enforcing an erosion and sediment control program through City ordinances. The City relies upon ADEM standards for appropriate erosion and sediment controls for qualified construction sites. There is a focus on coordination with ADEM on compliance concerns with sites that are greater than one (1) acre in size.

A. Residential Erosion and Sediment Control Ordinance

Current Program:

The City updates as necessary its Erosion and Sediment Control Ordinance. This ordinance would regulate land disturbances that are less than l acre area of exposed soils associated with land disturbance, except for a6rricultural operations.

Measurable Goals:

The Environmental Programs Department updates - as necessary - its existing Erosion and Sediment Control Ordinance. · During the remainder of the permit cycle, the ordinance is a living document that undergoes a constant internal review. On an annualized basis the document is reviewed by the Board and adjustment are made, to be followed by submittal to the City Council for review and adoption. After adoption, implementation will, to the maximum extent practical, begin. During the remainder of the permit cycle, following any updates to the Erosion and Sediment Control Ordinance, the BMP checklist would also be updated.

Responsible Departments: Building and Environmental Programs

B. Land Use and Development Ordinance

Current Program:

For all new and redevelopments within the City Leeds corporate limits, an erosion and sediment control plan are required to be designed and submitted by a qualified credentialed professional (QCP). This plan is reviewed and approved by the Building Department and City Engineer, then forwarded to the Planning Commission for approval. Components of the plan have to meet and exceed the Alabama Handbook for Best Management Practices for Erosion and Sediment Control, most current edition (Alabama Handbook), and ADEM permit requirements. If for any reason, additional state and federal permits are required, such as an ADEM NPDES or US Corps wetland permit, the City will, to the maximum extent practical, not issue the site a land disturbance permit or building permit until proof of the federal or State Permit is submitted to the City. Sites are inspected along with building inspections for compliance with the ordinance. There is a minimum of seven (7) required inspections, 1. Pre-construction – BMP, 2. Footing 3. Slab/Foundation, 4. Framing Inspection, 4. House Wrap, 5. Rough In, 6. Utility connections, 7. Final Inspection and any re-inspections during construction. Enforcement mechanisms include written warning letters, stop-work orders, and municipal fines through the issuance of municipal offense tickets.

Measurable Goals:

For the Permit period, the City will, to the maximum extent practical, review all submitted new and redevelopment erosion and sediment control plans.

Responsible Department: Environmental Programs

C. Erosion and Sediment Control Training for City Building Inspectors

Current Program:

All City Building Inspectors are required to receive annual training through a Qualified Credential Inspector Program. This training gives the inspectors the knowledge needed to effectively monitor single-family residential and commercial construction sites for erosion and sediment controls and stormwater runoff concerns.

Measurable Goals:

Throughout the permit period, continue the annual training required to keep building inspectors current in their certifications. Track the training and submit data in the City's Annual SWMPP Report.

Responsible Department: Building and Environmental Programs

D. Construction Site Inspections and Enforcement greater than one acre

Current Program:

Inspections of all construction sites are an integral part of MCM 3. Before starting any land disturbance on a qualified construction site, the developer must submit their ADEM construction general permit authorization. The City maintains an inventory of all qualified construction sites within the MS4 area. Currently, all qualified construction sites have been inspected a minimum of twice during the construction process. The City has created an Erosion and Sediment Control Inspection Form (See SOP Manual) that includes the following: developer/owner information, current weather conditions, the status of BMPs, deficiencies noted, if a re-inspection is required and if enforcement action will, to the maximum extent practicable, is pursued. During the Inspection, all discharge points are inspected, and the site conditions are compared to the approved erosion and sediment control plan. Any deficiencies are noted and reported to the site manager and the developer. The developer has forty-eight (48) hours to correct all deficiencies from the Inspection or face a stop-work order until they are corrected. The construction site is not complete until the site is permanently stabilized, all construction debris removed, and the removal of temporary sediment control structures. A final inspection is required before release from the Permit.

Enforcement varies based on the severity of the deficiencies. Minor concerns will, to the maximum extent practical, receive a written or verbal warning requiring 48 hours to comply with the ordinance. If not corrected or there are significant deficiencies, the City may stop work on the construction site. Stop-work orders are typically issued on sites with active construction, while BMP deficiencies still exist. When an erosion or sediment control complaint regarding a construction site is received, immediate action is taken by Environmental Programs to inspect, document, and resolve the compliance issue using enforcement if needed.

The City of Leeds conducts inspections of priority sites at least once per month for those properties that discharge to 303d receiving waters.

Measurable Goals:

In 2018, the City added the Erosion and Sediment Control Ordinance to the Municipal Ordinance Ticket to enhance the enforcement process. Site inspections will, to the maximum extent practicable, be prioritized based on the status of construction, site conditions, location and size of the site, and proximity to sensitive areas such as streams and wetlands. Priority construction sites include qualified construction sites that discharge to impaired water listed for sediment or Outstanding Alabama Water. Priority construction sites will, to the maximum extent practical, receive precedence in inspections.

In 2019, the City brought online a new permitting and code enforcement system, at https://www2.citizenserve.com/leedsal

This system allows the public to report and track a complaint 24 hours a day, seven days a week, 365 days a year. In addition to this method, reports may be made at city hall during regular business hours, email to development@leedsalabama.gov, or call 205-864-2094.

Responsible Departments: Environmental Programs and Code Enforcement

D. Construction Associated with Sensitive Areas

Current Program:

The City requires that all projects within the city limits that are located within or near an environmentally sensitive area possess necessary federal and state permits before issuance of any land disturbance or building permit. Throughout the construction process, site inspections are performed by the city. Prior to the issuance of a certificate of completion, a final inspection is performed to ensure that there are no adverse environmental impacts that have occurred during installation.

Measurable Goals:

The City plans to continue the implementation of this inspection process.

The Inspection is recorded as any other construction inspection within the permitting system. Also, any significant deficiencies observed during staff inspections are communicated to the appropriate federal or state agencies.

Responsible Department: Building Department

E. Report a Concern/Complaint Porgram

Current Program:

The City maintains a public facing complaint database system, available to the public twenty-four (24) hours a day, seven (7) days a week, three-hundred sixy-five days a year,

to allow for the public to input concerns for investigation by the City. Once a complaint in taken in, the city will investigate and taken action pursuant to the SOP Manual, see SOP Manual
https://library.municode.com/al/leeds/munidocs/munidocs?nodeId=26ad5d4c2fdd0
The public is able to view the movement of the investigation, in real-time, anytime by logging into the system. All records, documents, photos, etc. are recorded and are available to the public. This system is tnsparent and facilitates compliance with regulations. See
https://www2.citizenserve.com/leedsal

Evaluation

The evaluation of the program includes the achievement of the program goals. Also, during the permit term, the program's effectiveness will, to the maximum extent practical, reveal itself based on construction site compliance. The results of the program will, to the maximum extent practicable, be evaluated annually and documented in the annual report.

Post Construction Storm Water Management in New and Re-Development (MCM 4)

The City employs a variety of strategies for MCM 4 from enforcement of ordinances to education outreach. The City's goal is to minimize water quality impacts from new Development and redevelopment sites. Each strategy will, to the maximum extent practicable, be detailed below along with its goal:

Permit Requirements:

Develop, implement, and enforce a program to address stormwater runoff from new and redevelopment projects that disturb greater than one (1) acre by ensuring that controls are in place that would prevent or minimize water quality impacts. The City relies upon ADEM for the regulation and enforcement of sites greater than one acre. Use the post construction ordinance or other regulatory mechanisms to address post-construction runoff from new development and redevelopment projects to the extent allowable under State or local law.

Ensure adequate long-term operation and maintenance of BMPs.

Target Audiences

MCM 4 targets developers, contractors, and property owners' associations.

Target Pollutants and Sources

MCM 4 targets non-point source pollutants found in stormwater. These pollutants include but are not limited to, sediment, paints, fertilizers, pesticides, swimming pool discharges, pathogens and oils, and greases. The sources that include, but are not limited to, illegal dumping, failing septic systems and illicit connections, swimming illegal connections of

a pool, unpermitted construction site discharges, improper disposal of fertilizers, pesticides, and herbicides, paints, etc.

Strategies, Goals, and Timelines

The City employs a variety of strategies for MCM 4 from enforcement of ordinances to education outreach. The City's goal is to reduce water quality impacts from new land development and redevelopment projects. Each strategy is detailed in the SOP Manual, along with its objective, timeline, and Department responsible for the implementation of the measure.

A. Perform Field Evaluations and Long-term Maintenance and Monitoring of BMPs

This element's goal is to periodically review and assess the performance of the post-construction BMPs installed with new and redevelopment projects. Field inspections verifying the adequate construction and performance of the BMPs per the approved improvement plans are inspected at a minimum once per year. The field inspections include an evaluation of the BMPs and how well the BMP is functioning since construction. Performance and potential improvements are be noted in the inspection record. If possible, the BMPs is inspected during a significant rainfall event. Information gathered with this element is used to revise acceptable BMPs and Processes. Should the BMP require maintenance or for any other reason not be functioning in an acceptable manner the city will notify the responsible party. If the responsible party does not comply, enforcement action is taken to compel compliance.

Measurable Goals:

Due to the limited number of post construction BMP's, the City reviews post-construction BMPs, at least once, annually, evaluate performance and design, and report the results in the annual reports and conduct enforcement as required to ensure compliance.

Responsible Departments: Environmental Programs, Community Development, Public Works

B. Low Impact Development/Green infrastructure Ordinance

Current Program:

Low-impact development is a term used to describe a land planning, and engineering design approach to managing stormwater runoff LID emphasizes conservation and use of on-site natural features to protect water quality. This approach implements engineered small-scale hydrologic controls to replicate the predevelopment hydrologic regime of watersheds through infiltrating, filtering, storing, evaporating, and detaining runoff close to its source.

Green infrastructure is a concept that highlights the importance of the natural environment in decisions about land use planning. In particular, there is an emphasis on the "life support" functions provided by a network of natural ecosystems with an emphasis on interconnectivity to support long-term sustainability. EPA has extended the concept to the management of stormwater runoff at the local level through the use of natural systems or engineered systems that mimic natural systems to treat polluted runoff.

Measurable Goals:

The City, through its Post Construction Ordinance, requires Low Impact Development/Green infrastructure. (Please see the Post Construction Ordinance)

Responsible Departments: Development, Environmental Programs, and Public Works

C. Perform Education Outreach for the Development Community

Education and outreach are required to assure that the development community is informed about the program and correct design standards to minimize pollutants discharged in stormwater runoff. Outreach activities will, to the maximum extent possible, include distribution of existing or new education materials in conjunction with the Public Education and Outreach MCM, and sponsorship of workshops targeted to the development community.

Measurable Goals:

Throughout the permit period, the City provides outreach materials from local agencies for contractors and the public at specific locations determined under the Public Education/Outreach MCM.

Responsible Department: Environmental Programs

Evaluation

The evaluation of an MCM 4 program is best measured by the goals that it meets. At the end of the permit year, the program is evaluated for the overall effectiveness of MCM 4 through assessment of performance.

Pollution Prevention/Good Housekeeping for Municipal Operations (MCM 5)

Permit Requirement

Pollution Prevention/Good Housekeeping for Municipal Operation (MCM 5) requires the City to develop and implement a program for pollution prevention and good housekeeping at municipal operations. It also requires the development and implementation of an employee training program designed to prevent and reduce stormwater pollutants, to the maximum extent practicable, in areas such as parks maintenance, fleet, and building maintenance, new construction, and land disturbances, stormwater system maintenance, and all other applicable municipal operations.

The program must list all municipal operations and industrial activities impacted by this operation and maintenance program. The training program is coordinated with public outreach programs for stormwater pollution and illicit discharges. The program shall include maintenance activities, schedules, and long-term inspection procedures for controls to reduce floatables and other pollutants to the MS4. The program shall also address controls for reducing or eliminating the discharge of pollutants from streets, roads, highways, municipal parking lots, maintenance and storage yards, waste transfer stations, recycling collection centers, fleet or maintenance shops with outdoor storage areas, and fill dirt storage areas.

Procedures shall account for the proper disposal of waste removed from the MS4 and municipal operations, including materials such as dredge spoil, accumulated sediments, floatables, and other debris. There will, to the maximum extent practical, also be procedures to ensure that new flood management projects are reviewed for impacts on water quality, and existing projects are assessed for the incorporation of additional water quality protection devices or practices.

Target Audiences

MCM 5 will, to the maximum extent, be practical, municipal target operations, including municipal employees and elected officials. Federal, State and county agencies will, to the maximum extent practical, also be included through coordinated efforts with the program.

Targeted Pollutants and Sources

MCM 5 will, to the maximum extent practical, target all non-point source pollutants found in stormwater. These pollutants include but are not limited to, sediment, trash, fertilizers, pesticides, pathogens, and oils and greases. The targeted sources are municipal operations and facilities and publicly owned properties and rights-of-way.

Outreach Strategies, Goals and Timelines

The City employs a variety of strategies for MCM 5, but will, to the maximum extent practical, identify strategies into two separate categories: Pollution Prevention and Good Housekeeping.

A. Pollution Prevention

Pollution prevention includes measures that involve rights-of-way, including bridges, stormwater management systems, and roadways. This section includes the following measures for compliance with the permit requirements:

1. City Facility Recycling Programs

2. Storm Water System Maintenance Programs

3. Litter Patrol

4. Stormwater Capital Projects

Measurable Goals:

City Recycling Program:

The City municipal buildings are equipped with recycling containers. Employees are expected to recycle these wastes except for confidential documents. . Furthermore, the City implemented recycling containers for plastic bottles and aluminum cans at our Sports Fields and during all festivals and events held in City parks.

Storm Water Management System Maintenance:

The MS4 for the City contains grassed and concrete swales, culverts inlets, and pipes. Currently, these areas are maintained on an as-needed basis by determination of the Public Works. Areas are also maintained when a valid drainage complaint is reported with the City.

The Public Works Division and Environmental Programs meets annually to update - as necessary the plan of action for stormwater management system maintenance.

The City utilizes a tracking mechanism system to quantify issues and operation of the stormwater system.

The goal is to show quantities of pollutants removed from the system. The stormwater management system's significant maintenance areas are tracked through the Public Works Department..

Litter Patrol:

The City operates and maintains its streets and right of ways in a manner to minimize the discharge of pollutants. The Public Works Department, before weekly mowing, designated crews pick up trash weekly from the City's ROW. Any severe ROW erosion is noted during mowing an repaired promptly. Grassed ditches serve as stormwater filters during rain events.

Capital Storm Water Projects:

Each new budget year, the City determines a list of capital projects to be conducted during the budget year. The Mayor's Office is the lead in this effort. These projects typically include a significant amount of funding and the hiring of an outside engineering firm and contractor. Each year these projects are proposed to the City Council and Mayor for approval. If approved, the project is scheduled for implementation over a specific period of time. Some of these projects may be emergency repairs due to natural disasters and are completed as soon as practicable for the safety of the public.

Monitoring of all capital stormwater projects are monitored for compliance with the City's erosion and sediment control and post construction ordinance.

Inspections of these projects is performed for all qualified construction sites. Any deficiencies require immediate attention and compliance. The annual report will reflect a list of all projects, project location, details, goals of the project, and compliance inspections.

Responsible Departments: Council, Environmental Programs, Mayor, Public Services

B. Good Housekeeping

Good Housekeeping includes measures that involve City-owned facilities. This section includes the following measures for compliance with the permit requirements:

1. Inventory of Facilities

2. Assessment of Facilities

3. SWMP Standard Operating Procedures (SOP) for Facilities

Measurable Goals:

Inventory of Facilities:

The City maintains an inventory of all City-owned facilities and has established a baseline assessment for reducing pollutants from stormwater runoff. This inventory includes buildings, parks, vacant property, parking areas, and ancillary storage areas include the drainage area, each facility's impacts, and all potential pollutants.

Public Works – 1st Ave
City Hall/Development/Annex - 9th St
Gazebo Park – 9th St
Fire Station No. 2 – Maxey Dr.
1st Ave Property
Old Landfill
Old City Park – Lane Dr
Moton Park – Moton St
Cedar Grove Cemetery – Ashville Rd.
Park Drive Municipal Complex – Park Dr.
Historic Park – Montevallo Rd
Memorial Park – Montevallo Rd
Zeigler Rd Property – Zeigler Rd

Assessment of Facilities:

An assessment include an inspection of all areas. All deficiencies are, to the maximum extent practicable, identified, and reported to the appropriate supervisor for remediation.

SWMPSOPs:

Following the assessment, each facility utilizes standard operating procedures (see SOP manual) to gauge the effectiveness of stormwater and housekeeping practices and to prepare written reports. The reports are performed on an annual basis, by Dec 31 of that year.

Responsible Departments: Environmental Programs, Fire Department, Public Works

Training:

Training is essential for all City employees regarding pollution prevention and good housekeeping. Previous MCMs detail specific training programs that are, to the maximum extent practicable, implemented by the City. The City will, to the maximum extent practical, also develop a training program for educating employees regarding stom1 water runoff and pollution prevention. This training may be a part of other MCM training.

For the duration of the Permit:

1. Maintain a training presentation for new hires on fundamental stormwater issues

2. Maintain a training presentation for new hires on IDDE, Pollution Prevention, and Good Housekeeping

The City will, to the maximum extent practical:

1. Provide one general stormwater training session annually for new employees involved in the program.

2. Provide specific training in regard to facility SOPs yearly for all employees with program responsibility

Responsible Departments: Environmental Programs and all other City Departments

Evaluation

The evaluation of the program will, to the maximum extent, be practicable, including the achievement of the program goals. Also, during the permit term, the effectiveness of the program will, to the maximum extent practical, reveal itself based on actual pollutant amount removal from the stormwater management system. The results of the program will, to the maximum extent practicable, be evaluated annually and documented in the annual report.

Water Quality Monitoring Plan

Records of monitoring information shall include:

The date, exact place, and time of sampling measurements

The name of the individual who performed the sampling or measurements;

The date(s) analyses are performed:

The names of the individual who performed the analysis;

The analytical techniques or methods used; and

The results of such analyses

Monitoring results will, to the maximum extent practicable, be reported with the SWMP Annual Report. Target Pollutant

Sediment will, to the maximum extent practicable, be the targeted pollutant for the City's Water Quality Monitoring Program.

Outreach Strategies, Goals and Timelines

Measurable Goals:

Reduction in sediment load in streams and the MS4 should be the measurable goal of this element.

Record Keeping and Reporting

The State's general permit requires the submission of an annual report; reports are due on May 31st of each year during the first five-year permit period. The governing must certify these reports body or an official designated by the governing body. At a minimum, the annual reports contain the following information:

Statuses of compliance with permit conditions:

An assessment of the appropriateness and effectiveness of the identified BMPs;

Status of the identified measurable goals of reducing the discharge of pollutants and protecting water quality.

Results of information collected and analyzed. Including monitoring data, if any, during the reporting period:

A summary of the stormwater activities that the permittee plans to undertake during the next reporting cycle;

An assessment of the appropriateness and effectiveness of the identified BMPs;

Any proposed change(s) to the SWMP along with a justification as to why the change(s) is necessary; and change in person(s) implementing and coordinating the SWMP.

The Environmental Programs Manager is responsible for assembling information from the various City departments to author the annual reports. Forms for use in recordkeeping by involved departments will, to the maximum extent practicable, be created to facilitate collection of the required annual reports.

The City keeps records as required by the permit for at least five years or the duration of the permit. The records used to document compliance with SWMPare, be available to the public. The SWMP and related documents may be viewed at the Development Services Offices, at 1404 9th St, Leeds, AL 35094.