

NPDES Storm Water Management Program (SWMP) Plan



Prepared for:

The City of Smiths Station
Phase II NPDES MS4 Permit Number ALR040036
2336 Lee Road 430
Smiths Station, Alabama 36877

Prepared by:



Engineering. Environmental. Answers.

778 North Dean Road, Suite 200-A
Auburn, Alabama 36830

Post Office Box 2155
Auburn, Alabama 36831

Contents

1. Certification	3
2. General Introduction	4
2.1 Site Description.....	4
2.2 Water Quality Concerns	4
2.3 Responsible Party	5
2.4 Phase II MS4 Requirements.....	6
A. Public Education and Outreach on Storm Water Impacts.....	7
B. Public Involvement/Participation	10
C. Illicit Discharge Detection and Elimination (IDDE).....	14
D. Construction Site Storm Water Runoff Control	18
E. Post-Construction Storm Water Management in New Development and Redevelopment	20
F. Pollution Prevention/Good Housekeeping for Municipal Operations	22
3. Summary	24
Appendix A.....	SWMP Control Measures
Appendix B.....	Public Education and Outreach on Storm Water Impacts
Appendix C.....	Public Involvement/Participation
Appendix D	Illicit Discharge Detection and Elimination
Appendix E.....	Construction Site Runoff Control
Appendix F	Pollution Prevention and Good Housekeeping for Municipal Operations

1. Certification

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

The Honorable LaFaye Dellinger
Mayor, City of Smiths Station


Signature


Date

2. General Introduction

On November 16, 1990, the U.S. Environmental Protection Agency (EPA) promulgated regulations, under the Water Quality Act of 1987, setting forth application requirements for National Pollutant Discharge Elimination System (NPDES) storm water permits.

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

2.1 Site Description

The City of Smiths Station is located in the southeast corner of Lee County and is part of the Columbus, Georgia-Alabama Metropolitan Statistical Area. Metropolitan areas located adjacent to the City include Phenix City and unincorporated areas of Lee County. Census data for 2010 shows the population of Smiths Station to be 4,926.

2.2 Water Quality Concerns

The City of Smiths Station has three (3) receiving waters to which the MS4 discharges to:

- Mill Creek
- Holland Creek
- Hospilika Creek

As a growing community, Smiths Station recognizes the importance of protecting the natural environment, and balancing the need for growth and economic development with environmental consideration.

The only impaired stream located within the corporate limits of Smiths Station is Mill Creek. Mill Creek is listed as impaired for organic enrichment from sources attributed to urban development. The



headwaters of Mill Creek are located within portions of Smiths Station and unincorporated areas of Lee County. Due to the limited availability of a sanitary sewer system, much of the wastewater from residential and commercial sources is treated by on-site sewage disposal systems. In 2010, a watershed management plan was developed for Mill Creek. The watershed management plan identified potential sources of pollution contributing to the impairment of Mill Creek, as well as recommended Best Management Practices (BMPs) that could be implemented to improve the quality of Mill Creek.

2.3 Responsible Party

The City's storm water program is managed by several City Departments and by community activities, which involve volunteer work. The City does not have the financial resources to dedicate personnel solely to storm water, water quality. Therefore, these responsibilities are shared by employees and considered part of the efforts. The following individuals may be contacted to address questions or concerns regarding the City of Smiths Station's MS4 program:

The Honorable Lafaye Dellinger
Mayor, City of Smiths Station
2336 Lee Road 430
Smiths Station, Alabama 36877
(334) 297-8771

Jerry F. Bentley
City Clerk, City of Smiths Station
2336 Lee Road 430
Smiths Station, Alabama 36877
(334) 297-8771

Lisa Pippin-Hall
Planning and Zoning Administrator, City of Smiths Station
2336 Lee Road 430
Smiths Station, Alabama 36877
(334) 297-8771



2.4 Phase II MS4 Requirements

U.S. EPA defines the requirements for a SWMP plan designed to reduce the discharge of pollutants from the MS4 to the maximum extent practicable (MEP) to protect water quality, and to satisfy the appropriate water quality requirements of the Clean Water Act in Title 40, Part 122, Sections 30 through 37 of the Code of Federal Regulations (40 CFR Parts 122.30 through 122.37). These regulations are incorporated into the SWMP plan by reference.

The Phase II storm water regulations require operators of small MS4s in urbanized areas to develop and implement storm water management programs employing BMPs to adequately address the six minimum control measures. These control measures include the following:

- Public Education and Outreach on Storm Water Impacts
- Public Involvement/Participation
- Illicit Discharge Detection and Elimination (IDDE)
- Construction Site Storm Water Runoff Control
- Post-Construction Storm Water Management in New Development and Redevelopment
- Pollution Prevention/Good Housekeeping for Municipal Operations

2.5 Primary Target Audiences

The City of Smiths Station has created BMPs to best address the NPDES permit's requirements for all audiences located within the City's MS4. The following are the audiences that the City hopes to reach:

- General Public (homeowners and citizens) potential contributors of storm water pollution through activities such as illicit discharges and over fertilization of lawns. The primary pollutants potentially contributed by this target audience are nutrients and pathogens.
- Engineers, Developers and Contractors potential contributors of storm water pollution through development and construction activities, as well as engineering design of storm water pollution prevention best management practices. The primary pollutants potentially contributed by this target audience are sediment and nutrients.

- Landscape companies potential contributors of storm water pollution primarily through lawn maintenance activities. The primary pollutants potentially contributed by this target audience are excess nutrients.
- Local businesses potential contributors of storm water pollution through activities such as illicit discharges and daily business activities. The primary pollutants contributed by this target audience are excess nutrients and pathogens.

A. Public Education and Outreach on Storm Water Impacts

Rationale:

The City is dedicated to achieving the conditions of this permit by working to ultimately improve water quality by reducing pollutants in receiving waters within the City's MS4 area. The City's goals are to educate the general public, contractors, developers, business owners, and municipal employees on the storm water management program and focus on a unified approach to the identification and correction of problem areas.

The overall management and reporting personnel of the City's storm water public education and outreach program is detailed in Section 2.3. Success of the City's public education and outreach program will be assessed by the results from water quality monitoring, as well as storm water pollution awareness in the community by the quantity of people reached in a permit year.

The City has established the following public education outreach program measurable goals and BMPs:

Local Partnerships

Smiths Station has been an active partner in the formation and continued participation of a citizen advisory committee known as "ALOAS". ALOAS was created in 1999 and is comprised of citizens and representatives from the City of Auburn, Lee County, City of Opelika, Auburn University, and Smiths Station. ALOAS was created to provide a public forum for input on educational materials, storm water policies, and storm water regulations.

To capitalize on education materials and programs that have been developed, Smiths Station has formed partnerships with several state and local organizations including:

- Alabama Department of Environmental Management;
- Alabama Clean Water Partnership;
- Alabama Cooperative Extension System;
- City of Auburn;
- City of Opelika;
- Auburn University;
- Lee County;
- Save our Saugahatchee.

As the City's MS4 program continues to evolve, the City will establish partnerships with the entities listed above as well as to seek partnerships with other agencies and organizations to facilitate the public education program.

City Website

The City website has a Storm Water Page. Currently this page makes available this City's current Storm Water Management Program (SWMP) Plan, NPDES Permit No. ALR040036, educational articles on storm water, septic system maintenance, illicit discharges, and the Mill Creek Watershed. A video on septic system maintenance produced by the Alabama Public Health Department and other sponsors is also available on the City's website.

The website is kept current and updated with public education events, workshop and volunteer opportunities that promote awareness of the impacts of storm water discharges into streams, rivers, creeks, lakes and ponds.

The City's website address is www.smithsstation.us/. Go to the City Departments tab and choose Storm Water. There are articles under "Recent News" on our front page that introduce the new page and another on expanding our recycling program to include plastics. Screenshot copies are included in Appendix B of this SWMP plan.



Brochures

Various informational and educational brochures have been developed, printed and distributed by the City and throughout Lee County. The City has found this to be an effective way to present and explain storm water issues. The following series of educational brochures have been produced by the ALOAS Storm Water Advisory Panel and are available at the Smiths Station Government Center. Copies of the current brochures are included in Appendix B of this SWMP plan.

- Lawn Care and Smart Yards
- The Halawakee Creek Watershed
- Local Water Resources
- Our Local Watersheds - What is a Watershed?
- Saugahatchee Creek Watershed
- Parkerson Mill Creek Watershed
- Low Impact Development
- Materials Management on Construction Site
- Rain Gardens
- Emerging Contaminants
- Erosion and Sediment Control
- Stormwater Treatment - Alternative Technologies
- Stormwater Policy on Erosion and Sediment Control
- Illicit Discharges
- Sewer Systems
- Stream Buffers
- Stormwater Related Websites

Water Festival

The City of Smiths Station participates in the planning and organizing of the event each year. This is a free two (2) day event open to all fourth grade students in Lee County including public, private and home schooled children. The mission is to educate students and their families about all aspects of surface water, ground water and their related natural resources. Through three exciting and informative hands on classroom activities and an environmental magic show, the children gain a greater knowledge of the water cycle and how they and their families can have a positive impact on improving water quality by being good environmental stewards.

Mail Outs

The City of Smiths Station mails out approximately 1,500 solid waste invoices quarterly to Smiths Station residents and promotes awareness of the Mill Creek Watershed project and its activities and volunteer opportunities via their website, www.aces.edu/MillCreek. An example copy of the mail out is located in Appendix B of this SWMP plan.

*Table A.1: Schedule of Events for Public Education and Outreach Efforts **

Control Measure	BMP	Description	Activity Schedule
Public Education	Local Partnerships	Program feedback and educational materials	Continuous throughout year
Public Education	City Website	Provide residents information	Continuous throughout the year
Public Education	Brochures	Provide public information	Develop 2 brochures/year, Continuously available
Public Education	Water Festival	Educational program for 4 th graders	Annual event for students
Public Education	Mail Outs	Provide public information	1500/quarter in solid waste invoices

*A detailed chart containing all control measures is located within Appendix A of the SWMP.

B. Public Involvement/Participation

Rationale:

The City's goals to involve the public with the development and implementation of its storm water program by providing activities to encourage and foster community participation in water quality improvement by reducing and eliminating pollution to receiving waters in the City's MS4.

The overall management and reporting personnel of the City's storm water public involvement and participation program is detailed in Section 2.3. Overall success of the City's public involvement and participation program will be assessed by the results from water quality monitoring as well as storm water pollution awareness in the community by the number of people attending each event.

The City has established the following public involvement and participation program measurable goals and BMPs:

ALOAS Citizens Storm Water Advisory Committee

The City of Smiths Station is an active member of the City of Auburn, Lee County, City of Opelika, Auburn University and the City of Smiths Station Citizen Advisory Committee. This committee meets each quarter to discuss issues related to water quality in Lee County's water bodies, clean-up efforts and volunteer opportunities, educational opportunities, storm water policy, and how to better develop, implement and review our SWMP programs.

The committee also develops and publishes two (2) new storm water impact-related brochures a year for the Lee County area, which is discussed in the Public Education section of this SWMP plan.

Mill Creek Watershed Management Project

The City of Smiths Station is an active partner and stakeholder since the inception of this group and the project was recently awarded a second two (2) year Section 319(h) grant from ADEM on November 18, 2013. Other partners and sponsors include Phenix City, Auburn University, Alabama Department of Environmental Management, U. S. Environmental Protection Agency, Lee and Russell Counties, Consolidated Resources, LLC., and the Alabama Cooperative Extension System.

Mill Creek Best Management Practices (BMP) Selection Committee

The City of Smiths Station continues to be an active member and represented on this sub-committee of the Mill Creek Watershed Project and actively participates in all meetings and site visits. This ongoing planning and decision process will continue over the next two years (through 2016).



Chattahoochee-Chipola Clean Water Partnership

Alabama Clean Water Partnership

The Alabama Clean Water Partnership is a statewide 501(c)(3) non-profit organization that is a diverse and inclusive coalition of public-private interest groups and individuals working together to improve, protect and preserve water resources and aquatic ecosystems in Alabama. The City of Smiths Station is an active member and participates in the stakeholders committee meetings.

Parkerson Mill Watershed Management Plan Group

The City of Smiths Station participates in watershed management activities and preservation activities contained in the Parkerson Mill Watershed Management Plan. The City promotes and participates in periodic clean ups and workshops for the public within the watershed.

Lee County Water Festival Leadership Committee

The City of Smiths Station continues to be an active member of the Leadership Committee involved with the planning and organization of this annual educational event. This group is responsible for applications and approval to reserve facilities at Auburn University to host the event, managing the volunteer base, organizing the water quality t-shirt art design competition, communicating and scheduling all schools, ordering classroom supplies, booking, and the like. Other partners in this effort are ADEM, Auburn University, City of Auburn, Lee County, USDA- Natural Resources Conservation Services and numerous other sponsors. The City participates in the funding of this event each year.

Electronics Recycling

The City of Smiths Station participates in the Electronics Recycling and Document shredding event held in Opelika. The City provided flyers to announce the event to citizens of Lee County at the Smiths Station Government Center. The City also participated by recycling the City's electronic devices and equipment.

Recycling Drop-Off Site

The City of Smiths Station, partnering with Lee County, offers a voluntary recycling program for paper, cardboard and plastics. The site is located at the rear of the Smiths Station Government Center Building



and posted on the City's website to increase awareness of the opportunity to recycle. A screenshot of the advertisement and a picture of the drop-off site is included in Appendix C of this SWMP plan.

Annual Martin Luther King, Jr. Clean Up Day

This anti-litter campaign is held each year to promote awareness of litter and illegal dumping and the impact on the environment. A City representative discusses with the group the importance of each individual's responsibility to keep the City and our waterways clean and that each of person should speak up and hold friends and family accountable by educating others on the impacts of litter. An example copy of the flier is included in Appendix C of this SWMP plan.

City Council Meetings

The City advertises City Council Meetings to allow the public to come in for public input or comment on decisions that the City is making. The City also posts council minutes on the City website to provide the public with multiple ways to know what is happening within the City and voice their opinions.

City Website

The City has a website to announce current events and also to educate the public on stormwater impacts affecting the area. The City updates the website regularly in order to keep citizens up to date on current news in the area. Screenshots of the City's website are available in Appendix C of this SWMP plan.

Planning Commission Meetings

The City's website also announces when the City will hold a Planning Commission meeting (monthly) for citizens to be aware of for community input. The City updates the website regularly in order to inform the public of new developments within the City.

East Smiths Station Elementary School Educational Video Series

During construction of a bioretention area at the elementary school, a video series developed by Katie Dylewski, the Mill Creek Management Project, and the Alabama Cooperative Extension System (ACES) that covered basic water quality topics was created to educate elementary school students. Each video is 5-10 minutes long and can be accessed through the Alabama Cooperative Extension Systems' YouTube

Channel. The video series proved to be most helpful to give students background information on their local water quality before ACES personnel came to campus for education activities. Links to these educational videos are also on the City's website.

*Table B.1: Schedule of Events for Public Involvement and Participation Efforts**

Control Measure	BMP	Description	Activity Schedule
Public Involvement	ALOAS	Community Involvement Group	Meetings once/quarter
Public Involvement	Mill Creek Management Project	Community Involvement Group	Meetings are held on an as needed basis for updates
Public Involvement	Chattahoochee-Chipola CWP	Community Involvement Group	Meetings
Public Involvement	Parkerson Mill Watershed Management Group	Community Involvement Group	Quarterly meetings
Public Involvement	Water Festival Leadership Committee	Community Involvement Group	Meetings held as needed throughout the year approximately 5/year
Public Involvement	Electronics Recycling	Recycling Event for Public	Annually
Public Involvement	Recycling Drop off	Recycling for Public	Continuous
Public Involvement	MLK Jr. Clean Up Day	City Clean Up Day	Annual
Public Involvement	City Council Meetings	Community Input	Bi-Monthly
Public Involvement	Planning Commission Meetings	Community Input	Monthly
Public Involvement	City Website	Announcement of City Events/Storm Water Impacts	Continuous
Public Involvement	Website	City Council Minutes	Continuous
Public Involvement	Educational Videos	Bioretention Area Videos	Continuous

*A detailed chart containing all NPDES permit requirement control measures is located within Appendix A of the SWMP.

C. Illicit Discharge Detection and Elimination (IDDE)

Rationale:

The City's goal is to continue to identify and correct illicit discharges within the City's MS4 system, while educating the public on the importance of protecting the environment from illicit discharges. The City's monitoring program will help to manage and enforce its IDDE program.

The overall management and reporting personnel of the City's storm water illicit discharge detection and elimination program is detailed in Section 2.3. Success of the City's illicit discharge detection and elimination program will be assessed by the results from water quality monitoring, as well as storm water pollution awareness in the community.

The City has established the following illicit discharge detection and elimination measurable goals and BMPs:

MS4 Outfall Map

The City has updated their outfall map to reflect the 2010 Census Maps. The City has also completed locating and completed an Outfall Reconnaissance Inventory Field Sheet on each storm water outfall. The City was able to locate all 25 outfalls and document the characteristics of each. These were complemented with photographs taken of each outfall and all information has been organized in a storm water outfall inventory binder. This inventory is located in Appendix D of this SWMP plan along with the City's updated outfall map.

Dry Weather Screening

As previously mentioned, the City of Smiths Station has 25 outfalls in their MS4 area. The City is committed to conducting dry weather screening on all outfalls each calendar year. The City will also conduct inspections, as needed, during the year due to public complaints. The form that the City will use to perform dry weather screening and investigations is located in Appendix D of this SWMP plan. The form explains the City's standard operating procedure for screening and investigations.

Website Information and Public Education

The City has information listed on the City website detailing how to report a suspected illicit discharge. This information is listed on the City's Storm Water Page. Another educational resource the City provides its residents is the series of public service brochures featuring the "Nerdy Man" that the Alabama Clean Water Partnership, ADEM and other environmental groups produced. These materials are displayed and available to the public at City Hall.

Illicit Discharge Detection and Elimination Ordinance

The City is finalizing their Illicit Discharge Detection and Elimination Ordinance (draft in Appendix D) to prohibit materials not comprised of storm water, except discharges pursuant to an NPDES permit, from being discharged into the City's MS4. The City's Illicit Discharge Detection and Elimination Ordinance allows the City to ensure compliance with NPDES General Permit, ALR040036 by providing "To the extent allowable under State and local law, effectively prohibit, through ordinance, or other regulatory mechanism, non-storm water discharges into your storm sewer system... and implement appropriate enforcement procedures and actions."

This ordinance gives the City the right to enter a property to conduct an inspection and also provides the City with the capability to enforce to the extent allowable by the ordinance. The ordinance allows the City to provide exceeding enforcement actions to those who violate the Illicit Discharge Detection and Elimination Ordinance.

Inoperative Motor Vehicles Ordinance

The City has an ordinance that prohibits inoperative vehicles from being discarded on properties within the City limits over certain periods of time. This ordinance helps to ensure that the City can enforce penalties for any person violating the provisions of the ordinance. The ordinance is enforced and updated as needed. A copy of the ordinance is located in Appendix D of this SWMP plan.

Monitoring Plan

The City has developed an updated monitoring plan for their use. The City's monitoring plan is based around the Alabama Water Watch (AWW) Program and a copy of the plan is located in Appendix H of this SWMP plan detailing the City's sampling areas and frequency.

Spill Response and Illicit Discharge Tracking

The City currently uses two forms when a reported incident of illicit discharge is received. The forms are titled:

- Illicit Discharge Hotline Incident Tracking form
- Illicit Discharge Spill Response

The City Clerk manages and responds to reported incidents of suspected illicit discharges and potential hazardous spills. The City's Code Enforcement Officer and Planning and Zoning Administrator inspect, report and respond on construction site activities and erosion and sediment control violations. Example forms are located in Appendix D of this SWMP plan.

The County's Emergency Management Agency (EMA) is responsible for responding to any type of spill that may occur within the City's MS4 Area. If a spill enters the MS4, the EMA shall notify the Storm Water Program Coordinator. The Storm Water Program Coordinator shall evaluate the impacts of the spill on the MS4 and ensure appropriate corrective measures are taken to abate the spill. Follow up inspections of the affected area shall be performed as needed.

*Table C.1: Schedule of Events for Illicit Discharge Detection and Elimination Efforts**

Control Measure	BMP	Description	Activity Schedule
IDDE	Mapping/Inventory	Outfall Map	Reviewed once/year, Updated as needed
IDDE	Inspections	Dry Weather Screening	25 outfalls At least once/year
IDDE	Website	Education on reporting illicit discharge	Continuous
IDDE	IDDE Ordinance	Enforcement	Approval/Implementation by August 2014, Reviewed once/year and updated as needed
IDDE	Inoperative Vehicle Ordinance	Enforcement	Enforced and update as needed, Reviewed once/year
IDDE	Monitoring	Monitoring Plan	Continuous, updated as needed
IDDE	Monitoring	Spills and Illicit Discharge Tracking	Continuous

*A detailed chart containing all NPDES permit requirement control measures is located within Appendix A of the SWMP.

D. Construction Site Storm Water Runoff

Rationale:

The City's goal is to continue to identify and correct storm water pollution from construction projects within the City through the City's construction site runoff control program. The City's monitoring program will help to manage and enforce its construction site storm water runoff control program.

The overall management and responsible reporting personnel of the City's construction storm water runoff control program is detailed in Section 2.3. Overall success of the City's construction storm water control program will be assessed by the results from water quality monitoring, enforcement actions carried out during each permit year, as well as storm water pollution awareness with developers in the community.

The City has established the following construction storm water runoff program measurable goals and BMPs:

Construction/Post Construction Erosion and Sediment Control Ordinance

The City is finalizing their Construction/Post Construction Erosion and Sediment Control Ordinance (draft in Appendix E). This ordinance will provide the City with the ability to enforce the standards set forth in the Alabama Handbook for Erosion and Sediment Control. The City will have the capability to inspect and enforce to the extent allowable by the ordinance. The ordinance provides the City with exceeding enforcement actions.

Erosion and Sediment Control Inspections

The City has developed a system to track and manage erosion and sediment control on active construction sites within the City's MS4 area. This standardized system aids the staff in tracking inspections from the initial BMP inspection through the final inspection to ensure final controls are implemented to achieve final stabilization of the site. At final stabilization, storm water discharges should be free of turbidity and sediments and must remain so permanently. When verified by a final

inspection, the inspection report with all inspection documentation will be placed and remain in the site plan certificate file for the subject property. The goal of this tracking procedure is to continually improve the ability to communicate deficiencies to the permit holder. All tracking documentation forms and standard operating procedures are located in Appendix E of this SWMP plan.

Zoning Ordinance

The City of Smiths Station Zoning Ordinance was amended to add Section 4.18 Natural Resource Protection Standards. The purpose of the regulations is to allow maximum utilization of land while ensuring against detrimental impacts on the environment, neighboring properties and the public interest. The ordinance applies to all residential and nonresidential development and the identification of any environmental or natured feature described in the ordinance to establish standards of protection. A copy of the City’s updated zoning ordinance is located within Appendix E of this SWMP plan.

Rainfall Data Collection

The City of Smiths Station collects rainfall data onsite. The City has installed a rain gauge that is checked daily after any rain event and recorded on the rainfall log form to aide in knowing when a qualifying rain event has occurred to trigger an inspection on all applicable construction sites. A copy of the form can be found in Appendix E of this SWMP plan.

*Table D.1: Schedule of Events for Construction Site Storm Water Runoff Control**

Control Measure	BMP	Description	Activity Schedule
Construction Runoff Control	Construction/Post Construction ESC Ordinance	Enforcement	Approval/Implementation by October 2014, Reviewed once/year and updated as needed
Construction Runoff Control	ESC Inspections	Construction Site Inspections	As needed
Construction Runoff Control	Zoning Ordinance	Stream Buffer/Natural Resource Protection	Reviewed once/year, updated as needed
Construction Runoff Control	Rainfall Data Collection	Rainfall Records for Construction Site Inspections	Rainfall is recorded as needed and inspections are performed after qualifying rain events

*A detailed chart containing all NPDES permit requirement control measures is located within Appendix A of the SWMP.



E. Post-Construction Storm Water Management in New Development and Redevelopment

Rationale:

The City's goal is to continue to improve post-construction storm water runoff in order to improve water quality within the City's waterways. The City's monitoring program will help to manage and enforce its post-construction storm water management program.

The overall management and reporting personnel of the City's post-construction storm water management program is detailed in Section 2.3. Overall success of the City's post-construction storm water management program will be assessed by the results from water quality monitoring, as well as storm water pollution awareness in the community.

The City has established the following post-construction storm water management program measureable goals and BMPs:

Zoning Ordinance

The City of Smiths Station has adopted a zoning ordinance in order to ensure greenspace preservation within the City's MS4 area. The ordinance requires that no more than seventy (70) percent of the gross area of the site development be impervious. This ordinance also gives information about long-term maintenance of BMPs and gives the City enforcement capabilities to be carried out by Lee County at this time. A copy of the City's zoning ordinance can be found in Appendix E of this SWMP plan.

Final Erosion Control Inspections

The City of Smiths Station developed a standardized system to aide staff in tracking inspections from the initial BMP inspection through the final inspection to ensure final controls are implemented to achieve final stabilization of the site. At final stabilization, storm water discharges should be free of turbidity and sediments and must remain so permanently. A copy of the City's standard operating procedure is located in Appendix E of this SWMP plan.

Construction/Post Construction Erosion and Sediment Control Ordinance

The City is finalizing their Construction/Post Construction Erosion and Sediment Control Ordinance (draft in Appendix E). This ordinance will provide the City with the ability to enforce the standards set forth in the Alabama Handbook for Erosion and Sediment Control. The City will now have the capability to inspect and enforce to the extent allowable by the ordinance. The ordinance provides the City with exceeding enforcement actions.

Subdivision Regulations

The City of Smiths Station is evaluating additions of low impact development (LID) practices to the City's subdivision regulations. The City will provide ADEM with any updates as needed regarding these regulations. The City plans to update the subdivision regulations within the life of their current NPDES permit and is working with planning and zoning consultants to do so. A copy of the City's current subdivision regulations is located in Appendix F of this SWMP plan.

Flood Management

The City of Smiths Station participates in the National Flood Insurance Program (NFIP) that is administered by the Federal Emergency Management Agency (FEMA). The City Clerk serves as the City's Flood Administrator. The City's recently adopted Zoning Ordinance Amendment 2011-075.09 requiring a 25' stream buffer on each side of the bank (undisturbed, natural vegetative buffer) goes on to address "Where a regulatory floodway is present, the 25' stream buffer requirement will be measured from the outside boundary of the delineated floodway." A copy of the amendment to the zoning ordinance is included in Appendix E in this SWMP plan.

*Table E.1: Schedule of Events for Post-Construction Storm Water Management**

Control Measure	BMP	Description	Activity Schedule
Post-Construction	Zoning Ordinance	Stream Buffer/Natural Resource Protection	Reviewed once/year, updated as needed
Post-Construction	Final ESC Inspections	Site Stabilization Insurance	As needed for construction sites
Post-Construction	Construction/Post Construction ESC Ordinance	Enforcement	Approval/Implementation by August 2014, Reviewed once/year and update as needed

Post-Construction	Subdivision Regulations	Updates to address storm water impacts	Approval/Implementation by July 2016 through planning consultants
Post-Construction	Flood Management	Participation with NFIP	Continuous work to address flooding in the City

*A detailed chart containing all NPDES permit requirement control measures is located within Appendix A of the SWMP.

F. Pollution Prevention/Good Housekeeping for Municipal Operations

Rationale:

The City's goal is to continue to improve the pollution prevention and good housekeeping for municipal operations program in order to educate employees on ways to improve water quality within the City's waterways. The City's monitoring program will help to manage and enforce its pollution prevention and good housekeeping for municipal operations program.

The overall management and reporting personnel of the City's pollution prevention and good housekeeping for municipal operations program is detailed in Section 2.3. Overall success of the City's pollution prevention and good housekeeping for municipal operations program will be assessed by the results from water quality monitoring, as well as storm water pollution awareness with City personnel.

The City has established the following pollution prevention and good housekeeping for municipal operations program measureable goals and BMPs:

Recycling of Municipal Electronics

The City of Smiths Station participates in the Electronics Recycling and Document shredding event held in Opelika. The City provided flyers to announce the event to citizens of Lee County at the Smiths Station Government Center. The City also participated by recycling the City's electronic devices and equipment.

Litter Pickup

The City of Smiths Station utilizes court-ordered volunteers to perform routine litter pick up within the City's MS4. Court ordered individuals are placed under the direct supervision of the City's Code Enforcement Officer and the number of volunteers varies throughout the year. Each year the City holds a public anti-litter clean-up campaign in honor of Martin Luther King, Jr. where city staff, elected officials and volunteers spend a Saturday picking up litter as previously mentioned in the Public Involvement/Participation portion of the SWMP plan.

Municipal Operations Recycling Program

The City of Smith of Smiths Station has paper, plastics, and aluminum recycling bins at municipal buildings. This program is also open to the public. The City maintains a paper recycling bin in the main file and supply area at City Hall for municipal operations along with aluminum recycling. It is standard policy to encourage employees to participate in the City's recycling program.

Employee Survey

The City will assess what topics will be most pertinent to cover by an annual survey for employees to fill out, then review the necessary topics throughout the year that the survey recommended be addressed. A copy of the survey is located in Appendix G of this SWMP plan.

Municipal Training

The City of Smiths Station has developed a training schedule for municipal employees. The City understands the importance of training for their employees and would like to provide them with information on the impacts of storm water to the City of Smiths Station. Below in Table F.1 is the training schedule for the City, which will be covered each quarter in the City's safety meetings.

Table F.1: Municipal Training Schedule

Quarter	Topic
(1 st) January - March	Educational Activities within the City
(2 nd) April - June	Construction Site Programs within the City
(3 rd) July - September	Illicit Discharge Detection and Elimination
(4 th) October-December	Information on the MS4 Permit Requirements

*Table F.2: Schedule of Events for Pollution Prevention and Good Housekeeping for Municipal Operations**

Control Measure	BMP	Description	Activity Schedule
Pollution Prevention	Recycling	Recycling electronics with the City of Opelika	Annually
Pollution Prevention	Litter Pick Up	Court-Ordered Community Service	As needed
Pollution Prevention	City Clean Up	City staff participate in City clean-up event	Annually
Pollution Prevention	Municipal Operations Recycling	Recycling paper, plastics, and aluminum at City Hall	Continuous
Pollution Prevention	Employee Survey	Training Needs Survey	Annually
Pollution Prevention	Municipal Training	Training employees on Storm Water Issues	Once/quarter

*A detailed chart containing all NPDES permit requirement control measures is located within Appendix A of the SWMP.

3. Summary

The intent of this program is to reduce pollutants in storm water discharged from the storm sewer system and prevent the degradation of the receiving streams. The City of Smiths Station will continue to work toward reducing pollutant loading in the storm water and to improve the City's water quality.