

RAINBOW CITY

CONTROL MEASURE 2 - ILLICIT DISCHARGE DETECTION AND ELIMINATION

See Section 8.2 of the Annual Report and the SWMP

ACTIVITY NO.	STRATEGIES	2019-2020 IMPLEMENTATION STATUS	2020-2021 PROPOSED EFFORTS	SUPPORTING DOCUMENTATION	COMMENTS / CHANGES	PROPOSED CHANGES
1	<p>Identify Priority Areas: Re-evaluate the drainage basins and determine the Priority Areas for the reporting period</p>	<p>3 drainage basins have been identified and IDP Assessment performed on each basin (Zones 1-3)</p> <p>The IDP Assessment was performed on each basin. No priority areas were identified, however, Zone 1 had the highest IDP scores within the MS4 Urbanized Area</p>	<p>The City will re-evaluate the drainage basins and determine the Priority Areas for the reporting period.</p>	<p>A table providing the IDP Score for each drainage basin and map showing the identified drainage basins/ Priority Area are attached.</p> <p>(See Document Set 2-1 and 2-2)</p>		NO
2	<p>Outfall Identification: Implement a stream-walking program to identify outfalls and map a portion of water bodies that receive discharge from the MS4</p> <p>20% of 15.0 miles of stream inventory is 3.0 miles per reporting period</p>	<p>The City organized and categorized the 659 structures provided by Brent Means Land Surveying to identify the outfalls that enter blue-line streams or the Coosa River.</p> <p>30 of the 102 structures (see comments) were evaluated and 37 outfalls were identified and inspected</p> <p>72 structures remain to be evaluated</p>	<p>In April 2020 Brent Means Land Surveying, provided the City with a list of additional 186 structures. The City will organize and categorize these structures during the 2020-2021 reporting period.</p> <p>The City will walk 6.95 miles of stream in Zones 2 & 3 and evaluate the remaining structures in Zones 2 & 3 during 2020-2021.</p> <p>The City will walk 7.25 miles of stream in Zone 1 and evaluate the remaining structures in Zone 1 during 2020-2021.</p>	<p>A table of identified outfalls, the storm water map showing the identified outfalls, and a list of remaining structures to be evaluated are attached.</p> <p>(See Document Sets 2-3, 2-4, and 2-5)</p>	<p>* of the 659 structures, 393 structures were within the MS4 Boundary * of the 393 structures, 291 are structures only not associated with an outfall & 102 appear to be in the vicinity of an outfall</p> <p>Field observations are maintained in the Engineering Department.</p>	NO
3	<p>Probable Outfall Verification: Add probable outfalls to the GIS database and label as unverified.</p> <p>Verify outfalls within 18 months</p>	<p>75 probable outfalls identified based on aerial review 17 outfalls were field verified resulting in 6 identified outfalls</p>	<p>The City will evaluate the remaining probable outfalls in Zones 2 & 3 in 2020-2021.</p> <p>The City will evaluate the remaining probable outfalls in Zone 1 in 2021-2022.</p>	<p>The storm water map showing identified outfalls and a table of probable outfalls including those verified/evaluated are attached.</p> <p>(See Document Sets 2-5 and 2-6)</p>	<p>Field observations are maintained in the Engineering Department.</p>	NO
4	<p>Outfall Reconnaissance Inventory: Conduct dry weather monitoring of 20% of major outfalls in Priority Areas</p>	<p>The City inspected 3 identified major outfalls in the Priority Area (Zone 1). This is 100% of the major outfalls.</p>	<p>The City will conduct dry weather monitoring of 20% of major outfalls in Priority Areas.</p>	<p>Tables of inspected outfalls and a completed ORI form is attached.</p> <p>(See Document Sets 2-3, 2-6, and 2-7)</p>	<p>Field observations are maintained in the Engineering Department.</p>	NO
4a	<p>Outfall Reconnaissance Inventory: Conduct dry weather monitoring of 15% of all known outfalls</p>	<p>The City inspected 43 known outfalls. This is 100% of known outfalls.</p> <p>Zone 1 - 3 major, 28 minor Zone 2 - 1 major, 11 minor Zone 3 - 0</p>	<p>The City will conduct dry weather monitoring of 15% of all known outfalls.</p>	<p>Tables of inspected outfalls and a completed ORI form is attached.</p> <p>(See Document Sets 2-3, 2-6, and 2-7)</p>	<p>Field observations are maintained in the Engineering Department.</p>	NO
5	<p>Suspect Discharge Sampling: Field crews will collect samples of suspected illicit discharges for laboratory analysis</p>	<p>1 identified dry weather flows 0 suspect discharges 0 samples collected 0 confirmed illicit discharges</p>	<p>Field crews will collect samples of suspected illicit discharges for laboratory analysis.</p>	<p>Tables of inspected outfalls and a completed ORI form is attached.</p> <p>(See Document Sets 2-3, 2-6, and 2-7)</p>	<p>During inspections the City has confirmed several springs that contribute to some flow.</p> <p>Field observations are maintained in the Engineering Department.</p>	NO

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6	Outfall Ranking: Designate the inspected outfalls as having obvious, suspect, possible, or unlikely discharge potential based on data from each ORI Field Sheet	43 outfalls inspected 0 outfalls required further investigation	Designate the inspected outfalls as having obvious, suspect, possible, or unlikely discharge potential based on data from each ORI Field Sheet.	Tables of inspected outfalls and a completed ORI form is attached. (See Document Sets 2-3, 2-6, and 2-7)		NO
7	Discharge Investigation: Illicit discharge investigations will be performed to determine the source of a discharge problem	0 illicit discharges investigations 0 confirmed illicit discharges 0 sources determined 0 discharges eliminated	Where illicit discharges are identified, the City will conduct an illicit discharge investigation to determine the source.	Since there were no investigations a summary can not be provided.		NO
8	Corrective Action Record Keeping: Create a case log detailing pertinent information for each identified suspect illicit discharge or illicit connection	0 confirmed illicit discharges 0 corrected illicit discharges 0 eliminated illicit discharges 0 confirmed illicit discharges where corrective action is pending	When a suspect illicit discharge or illicit connection is identified, a case log will be created to track information related to the incident or report.	Since there were no investigations a summary can not be provided.		NO
9	Update Storm Water System Map - Existing Features: Update the existing GIS map as storm drain features are identified	Nothing new was added to the map.	The existing storm water system map will be updated as features are identified.	The Storm Water System Map is attached. (See Document Set 2-5)		NO
10	Update Storm Water System Map - Future Additions: Proposed additions to the City MS4, including new storm sewer and drainage ditches, will be mapped based on the civil plans provided to the City.	0 civil plans provided to the City 0 verified new feature was added to the Storm Water Map	Proposed and new additions will be mapped based on civil plans provided to the City.	The Storm Water System Map is attached. (See Document Sets 2-5)		NO
11	Evaluate IDDE Ordinance: Ordinance No.490 regulates Illicit Discharge enforcement Evaluate the effectiveness of the Ordinance each reporting period	The City evaluated the Ordinance on its effectiveness in addressing identified illicit discharges and preventing repeat offenders and no changes were deemed necessary	The City will evaluate the Ordinance annually.	The City's Ordinance was provided in the 2017 SWMPP.	0 complaint received 0 illicit discharge identified 0 resolved violation 0 repeat offenders 0 enforcement actions taken	NO
12	Distribute Storm Water Educational Material: Distribute educational materials to public highlighting identification and reporting of potential illicit discharges	The City placed educational materials at City owned buildings: 15 at the Library 15 at the City Hall Materials were restocked quarterly	The City will provide educational materials to the public via the webpage and/or materials in City buildings.	Educational Materials are attached. (See Document Set 1-1)		NO
12a	Distribute Storm Water Educational Material: The City will provide educational materials highlighting identification and reporting of potential illicit discharges on the City's storm water webpage	238 views were recorded for the webpage.	The City will provide educational materials to the public via the webpage and/or materials in City buildings.	The web site recorded hit information and the Stormwater web page are attached. (See Document Set 1-2)		NO

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13	Public Reporting and Tracking: Evaluate the storm water complaint form on the Storm Water web page for illicit discharges (including spills or illegal dumping), impaired waterways, and violations of ordinances relating to storm water pollution.	0 inquiries received by webpage several inquiries received by phone	The City will publicize the reporting number on the City's website and track received complaints and the City's responses to the received complaints. The City will evaluate the current public reporting and tracking methods.	The Storm water web page and complaint form are attached. (See Document Set 1-2)		NO
14	Municipal Training: Train City personnel on the identification of illicit discharges and procedures for reporting illicit discharges within the City organization	S&ME addressed illicit discharge identification in the Annual Training handout. This handout was provided to city employees on March 30, 2020 . 3 City employees attended training.	The City will train personnel on the identification of illicit discharges and procedures for reporting illicit discharges within the City organization.	Attendance record is attached. (See Document Set 2-8)		NO
15	Storm Water Monitoring Locations: Update existing Storm Water System Map with storm water monitoring locations	Additional monitoring points were not added to the monitoring plan	Where necessary, the monitoring locations will be updated in the city storm water system with revised coordinates.	The Storm Water System Map is attached. (See Document Set 2-5)		NO
16	Evaluation of Monitoring Data: Evaluate the collected monitoring data and make recommendations to add and/or modify monitoring points	An evaluation of the stormwater data has been provided in the 2019-2020 Evaluation.	COMPLETED	See summary of monitoring reports in Annual Report.		NO
17	NPDES Industrial Permitting: Evaluate permitted and unpermitted facilities in the City MS4	0 unpermitted facilities were reported to the ADEM during the reporting period	Unpermitted facilities will be reported to the Industrial Permits Section of ADEM.		Rainbow City continues to rely on the ADEM for NPDES permitting enforcement	NO
18	Additional Strategy: Participation in Public Meetings related to construction, non-point source, or storm water issues.	Mr. Joel Garmon attended Alabama Soil and Water Conservation Committee and Alabama Erosion and Sediment Control Partnership - Clear Water Alabama 2019 Field Site Visits on October 23-24, 2019	COMPLETED	The Certificate of Training sheets are attached. (See Document Set 3-4)		NO