

## RAINBOW CITY

### CONTROL MEASURE 2 - ILLICIT DISCHARGE DETECTION AND ELIMINATION

See Section 8.2 of the Annual Report and the SWMP

ACTIVITY NO.	STRATEGIES	2017-2018 IMPLEMENTATION STATUS	2018-2019 PROPOSED EFFORTS	SUPPORTING DOCUMENTATION	COMMENTS / CHANGES	PROPOSED CHANGES
1	<p><b>Identify Priority Areas:</b> 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 (DRY CREEK, HORTON CREEK, BIG WILLS CREEK)</p> <p>1 priority area identified (Big Wills Creek) 1 drainage basin newly listed as a priority area (Big Wills Creek) 1 drainage basin de-listed from priority area list (Horton Creek) Correct</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 Priority Area is attached.</p> <p>(See Document Set 2-1)</p>		NO
2	<p><b>Outfall Identification:</b> 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>199 outfall pipes underneath roads were been identified during the reporting period by Brent Means Land Surveying. The City did not organize or categorize the pipes to identify the outfalls that enter blue-line streams or the Coosa River.</p> <p>Previously Brent Means Land Surveying previously identified 640 pipes within the City Limits and 74 of which were outfalls.</p>	<p>The City will organize and categorize the identify pipes to identify the outfalls that enter blue-line streams or the Coosa River. The City will then add the identified outfalls to a Storm Water Map.</p>	<p>Tables of identified outfalls are attached.</p> <p>(See Document Sets 2-3a, 2-3b, and 2-3c)</p>	<p>Field observations are maintained in the Engineering Department.</p>	NO
3	<p><b>Probable Outfall Verification:</b> Add probable outfalls to the GIS database and label as unverified.</p> <p>Verify outfalls within 18 months</p>	<p>199 probable outfalls identified 0 outfalls verified</p>	<p>The City will organize and categorize the identify pipes to identify the outfalls that enter blue-line streams or the Coosa River. The City will then add the identified outfalls to a Storm Water Map.</p>		<p>Field observations are maintained in the Engineering Department.</p>	NO
4	<p><b>Outfall Reconnaissance Inventory:</b> Conduct dry weather monitoring of 20% of major outfalls in Priority Areas</p>	<p>The City inspected 8 identified major outfalls in the Priority Area (Big Wills Creek Basin). 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>A table of inspected outfalls and a completed ORI form is attached.</p> <p>(See Document Sets 2-4 and 2-5)</p>	<p>Field observations are maintained in the Engineering Department.</p>	NO
4a	<p><b>Outfall Reconnaissance Inventory:</b> Conduct dry weather monitoring of 15% of all known outfalls</p>	<p>The City inspected 74 known outfalls. This is 100% of known outfalls.</p>	<p>The City will conduct dry weather monitoring of 15% of all known outfalls.</p>	<p>A table of inspected outfalls and a completed ORI form is attached.</p> <p>(See Document Sets 2-4 and 2-5)</p>	<p>Field observations are maintained in the Engineering Department.</p>	NO
5	<p><b>Suspect Discharge Sampling:</b> Field crews will collect samples of suspected illicit discharges for laboratory analysis</p>	<p>0 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>A table of inspected outfalls and a completed ORI form is attached.</p> <p>(See Document Sets 2-4 and 2-5)</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
6	<p><b>Outfall Ranking:</b> Designate the inspected outfalls as having obvious, suspect, possible, or unlikely discharge potential based on data from each ORI Field Sheet</p>	<p>74 outfalls inspected 0 outfalls required further investigation</p>	<p>Designate the inspected outfalls as having obvious, suspect, possible, or unlikely discharge potential based on data from each ORI Field Sheet.</p>	<p>A table of inspected outfalls and a completed ORI form is attached.</p> <p>(See Document Sets 2-4 and 2-5)</p>		NO

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7	<b>Discharge Investigation:</b> 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	<b>Corrective Action Record Keeping:</b> 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	<b>Update Storm Water System Map - Existing Features:</b> 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 2-2)		NO
10	<b>Update Storm Water System Map - Future Additions:</b> 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 2-2)		NO
11	<b>Evaluate IDDE Ordinance:</b> 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  (See Document Set 2-5)	NO
12	<b>Distribute Storm Water Educational Material:</b> Distribute educational materials to public highlighting identification and reporting of potential illicit discharges	The City placed educational materials at City owned buildings:  20 at the Library 20 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	<b>Distribute Storm Water Educational Material:</b> The City will provide educational materials highlighting identification and reporting of potential illicit discharges on the City's storm water webpage	364 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	<p><b>Public Reporting and Tracking:</b> 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.</p>	<p>0 report received 0 complaint addressed 0 complaint resolved 0 report contained required information to find and address the suspected problem</p>	<p>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.</p>	<p>The Storm water web page is attached. Since there were no complaints, a summary of a complaint can not be provided.  (See Document Set 1-2)</p>		NO
14	<p><b>Municipal Training:</b> Train City personnel on the identification of illicit discharges and procedures for reporting illicit discharges within the City organization</p>	<p>S&amp;ME addressed illicit discharge identification in the Annual Training on <b>March 19, 2019</b>  2 City employees attended training.</p>	<p>The City will train personnel on the identification of illicit discharges and procedures for reporting illicit discharges within the City organization.</p>	<p>Attendance record is attached.  (See Document Set 2-5)</p>		NO
15	<p><b>Storm Water Monitoring Locations:</b> Update existing Storm Water System Map with storm water monitoring locations</p>	<p>Additional monitoring points were not added to the monitoring plan</p>	<p>Where necessary, the monitoring locations will be updated in the city storm water system with revised coordinates.</p>	<p>The Storm Water System Map is attached.  (See Document Set 2-2)</p>		NO
16	<p><b>Evaluation of Monitoring Data:</b> Evaluate the collected monitoring data and make recommendations to add and/or modify monitoring points</p>	<p>More background data is needed to evaluate the data. Generally AT-5 and HB-3 have the highest results</p>	<p>Once enough background data has been collected, a review will be conducted.</p>	<p>See summary of monitoring reports in Annual Report.</p>		NO
17	<p><b>NPDES Industrial Permitting:</b> Evaluate permitted and unpermitted facilities in the City MS4</p>	<p>0 unpermitted facilities were reported to the ADEM during the reporting period</p>	<p>Unpermitted facilities will be reported to the Industrial Permits Section of ADEM.</p>		<p>Rainbow City continues to rely on the ADEM for NPDES permitting enforcement</p>	NO