



Annual Report
April 1, 2021 to March 31, 2022
Etowah County MS4
Etowah County, Alabama
S&ME Project No. 215660G

PREPARED FOR:

Etowah County Commission
800 Forrest Avenue
Gadsden, Alabama 35901

PREPARED BY:

S&ME, Inc.
360D Quality Circle NW, Suite 450
Huntsville, AL 35806

May 31, 2022



May 31, 2022

Etowah County Commission
800 Forrest Avenue
Gadsden, Alabama 35901

Attention: Mr. Jaime Grant, Commission President

Reference: **Annual Report: April 1, 2021 to March 31, 2022**
Etowah County MS4
Etowah County, Alabama
S&ME Project No. 215660G
NPDES Permit No. ALR040009

Dear Mr. Grant:

S&ME has prepared the attached Annual Report for the Etowah County Phase II Small Municipal Separate Storm Sewer System in accordance with S&ME Proposal No. 22820108, dated April 22, 2022 and approved on April 25, 2022 under Purchase Order 2022-00001289. The Annual Report covers the April 1, 2021 to March 31, 2022 reporting period.

S&ME appreciates the opportunity to provide our services to Etowah County. Should you have questions concerning this report, or if additional information is required, please contact the undersigned.

Sincerely,

S&ME, Inc.


Sarah L. Yeldell, P.E.
Project Manager



Deborah J. Jones, P.E.
Senior Engineer



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1.0 Introduction

S&ME, Inc. has prepared this Annual Report for the Etowah County, Alabama Urbanized Area Phase II Small Municipal Separate Storm Sewer System in accordance with S&ME Proposal No. 22820108, dated April 22, 2022 and approved on April 25, 2022 under Purchase Order 2022-00001289.

The Annual Report is required by Part VI of the Alabama Department of Environmental Management (ADEM) National Pollutant Discharge Elimination System (NPDES) General Permit ALR040000 for discharges from regulated small municipal separate storm sewer systems (MS4).

1.1 Permit History

The Storm Water Phase II Final Rule issued by the United States Environmental Protection Agency (USEPA) in 1999 requires nationwide coverage of all operators of small MS4s located within the boundaries of an “urbanized area” as defined by the latest decennial Census. Based on the results of the 2010 census, the Bureau of the Census designated the *Gadsden, Alabama Urbanized Area* to include the City of Attalla, the City of Gadsden, the City of Glencoe, the City of Hokes Bluff, City of Rainbow City, the City of Southside, and portions of unincorporated Etowah County. A map outlining the approximate boundary of the 2010 *Gadsden, Alabama Urbanized Area* is included in **Appendix A** as **Figure 1**. Revised urbanized area boundaries based on the 2020 Census were not available as of May 31, 2022.

The City of Attalla, the City of Gadsden, the City of Glencoe, the City of Hokes Bluff, City of Rainbow City, the City of Southside, and Etowah County initially applied for and received a NPDES MS4 Phase II General Permit from ADEM in 2003, with the seven entities as co-permittees under authorization number ALR040009. The five-year permit expired on March 9, 2008. A Notice of Intent for renewal of the permit was submitted 180 days prior to expiration and permit coverage was administratively continued until the re-issuance of the MS4 Phase II General Permit with an effective date of February 1, 2011.

The 2011 permit expired on February 1, 2016. A Notice of Intent for renewal of the permit was submitted by each entity 180 days prior to expiration; therefore, the permit coverage was extended until the re-issuance of the MS4 Phase II General Permit in September. To assist in compliance tracking, the Gadsden-Etowah MS4 entities were each issued a separate permit, although the entities agreed to continue under a joint SWMPP and monitoring plan. The Etowah County MS4 was authorized to discharge under authorization number ALR040009 with an effective date of October 1, 2016.

The 2016 permit expired on September 30, 2021. A Notice of Intent for renewal of the permit was submitted 180 days prior to expiration, and the MS4 Phase II General Permit was re-issued with an effective date of October 1, 2021. The current permit will expire on September 30, 2026. Under the new permitting system, Etowah County was required to prepare a separate SWMPP detailing the individual actions taken by the City to comply with the 2021 permit, as well as the joint activities shared with the remaining Gadsden-Etowah MS4 entities.

A copy of the NPDES General Permit is included in the 2022 SWMPP.



1.2 Storm Sewer System

A Municipal Separate Storm Sewer System (MS4) is defined by 40 CFR Part 122.26(b)(8) to be a conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains) that is:

- (i) Owned or operated by a State, city, town, borough, county, parish, district, association, or other public body (created by or pursuant to State law) having jurisdiction over disposal of sewage, industrial wastes, storm water, or other wastes, including special districts under State law such as a sewer district, flood control district or drainage district, or similar entity, or an Indian tribe or an authorized Indian tribal organization, or a designated and approved management agency under section 208 of the CWA that discharges to waters of the United States;
- (ii) Designed or used for collecting or conveying storm water;
- (iii) Not a combined sewer; and,
- (iv) Not part of a Publicly Owned Treatment Works (POTW) as defined at 40 CFR 122.2.

1.3 Etowah County MS4 Area

The Etowah County Municipal Separate Storm Sewer System (Etowah County MS4) is defined as the unincorporated area within both the county and the urbanized area boundary. As defined by the 2010 Census, the *Gadsden, Alabama Urbanized Area* encompasses approximately 74.8 square miles. The Etowah County MS4 comprises approximately 12.7 square miles (17%) of the 2010 *Gadsden, Alabama Urbanized Area*. A map depicting the Etowah County MS4 limits is located in **Appendix A** as **Figure 2**.

1.3.1 Hydrologic Units in the Urbanized Area

Neely Henry Lake (Coosa River) is the primary receiving water for the Etowah County MS4. Hydrologic Hierarchy, Watersheds, and Subwatersheds are provided in the tables below.

Table 1-1 Hydrologic Hierarchy

Type	Code	Name
REGION	03	South Atlantic-Gulf
SUBREGION	03-15	Alabama River Basin
BASIN	0315-01	Coosa-Tallapoosa: Above the confluence of and including the Coosa and Tallapoosa River Basins
SUBBASIN	031501-06	Middle Coosa



Table 1-2 Watersheds in the MS4 Area

Watershed	10 Digit HUC
Big Wills Creek	03150106-01
Black Creek-Coosa River	03150106-02
Big Canoe Creek- Coosa River	03150106-03

Table 1-3 Subwatersheds in the Etowah County MS4 Area

Subwatershed	12 Digit HUC	Total Area (Acres)	Area within Etowah County MS4 (Acres)
Big Cove Creek	03150106-02-03	18,082	178
Black Creek	03150106-01-07	40,879	554
Coosa River-H. Neely Henry Lake	03150106-03-09	46,439	4,084
Horton Creek	03150106-01-08	16,902	1,823
Little Wills Creek	03150106-01-06	18,151	279
Lower Big Canoe Creek	03150106-03-06	33,306	52
Thorton Lakes-Dry Creek	03150106-02-02	9,777	24
Turkey Town Creek	03150106-02-04	57,474	1,126

A map showing the HUC12 subwatersheds in relation to the Etowah County MS4 boundary is included in the 2022 SWMPP.

1.4 Responsible Party

The **Etowah County Engineering Department** is responsible for the coordination and implementation of the Storm Water Management Program Plan. Coordination between County departments is established in each section of the SWMPP.

The **Storm Water Steering** Committee is responsible for the implementation of the monitoring plan.

1.5 Annual Report Components

Part IV of the NPDES General Permit requires that the Etowah County MS4 prepare and submit annual reports to the ADEM each year by May 31. The Annual Report must cover the year prior to the submittal date (April 1 through March 31) and is required to include the following:

1. Contacts and responsible parties who had input to and are responsible for the preparation of the annual report



2. Overall evaluation of the SWMPP-developments and progress on the following:
 - a. Major accomplishments
 - b. Overall program strengths/weaknesses
 - c. Future direction of the program
 - d. Overall determination of the effectiveness of the SWMPP considering water quality/watershed improvements
 - e. Measurable goals that were not performed and reasons why the goals were not accomplished
 - f. Evaluation of the monitoring data
3. A narrative report of all minimum storm water control measures referenced in the permit to include the following:
 - a. Minimum control measures completed and in progress
 - b. Assessment of the controls
 - c. Discussion of proposed BMP revisions or any identified measurable goals that apply to the minimum storm water control measures
4. Summary table of the storm water controls that are planned/scheduled for the next reporting cycle
5. Results of information collected and analyzed during the reporting period including monitoring data used to assess the success of the program at reducing the discharge of pollutants to the Maximum Extent Practical (MEP)
6. Notice of reliance on another entity to satisfy some of your permit obligations
7. Results of the evaluation to determine whether discharges from any part of the MS4 contributes directly or indirectly to a waterbody that is included on the latest 303(d) list or for which a TMDL has been established or approved by EPA
8. All monitoring results collected during the reporting period

In 2021, S&ME was retained by Etowah County to revise and update the SWMPP to meet the requirements of the reissued 2021 MS4 permit. The updated SWMPP was submitted to ADEM on April 1, 2022. This Annual Report covers activities performed under the previous SWMPP, dated January 1, 2017.

2.0 Contacts List

Reference Part VI.B.1

Part VI.B.1 of the NPDES Permit requires that the Etowah County provide a list of contacts and responsible parties involved in the preparation of the Annual Report. The following personnel were directly responsible for the preparation of the 2021-2022 Annual Report:



Mr. Robert Nail

Etowah County Engineer

402 Tuscaloosa Ave

Gadsden, AL 35901

(256) 549-5358

rnail@etowahcounty.org

Mr. Mel Smith

402 Tuscaloosa Ave

Gadsden, AL 35901

(256) 549-5358

msmith@etowahcounty.org

Ms. Sarah Yeldell, P.E.

Consultant

S&ME, Inc.

360D Quality Circle NW, Suite 450

Huntsville, Alabama 35806

256-837-8882

syeldell@smeinc.com

Mr. Nathanael Wade, E.I.

Consultant

S&ME, Inc.

360D Quality Circle NW, Suite 450

Huntsville, Alabama 35806

256-837-8882

nwade@smeinc.com

Questions concerning the 2021-2022 Annual Report should be directed to the **Engineering Department**.

3.0 Evaluation of Water Quality Concerns

Reference Part VI.B.7

Section 303(d) of the Clean Water Act (CWA), as amended by the Water Quality Act of 1987, and EPA's Water Quality Planning and Management Regulations (40CFR130) require states to identify waterbodies not in compliance with the water quality standards applicable to their designated use classifications. The identified waters are prioritized based on severity of the pollution. Section 303(d) then requires that total maximum daily loads (TMDLs) be determined for all pollutants causing violation of applicable water quality standards in each identified segment. The TMDL process establishes the allowable loading of pollutants, or other quantifiable parameters for a waterbody, based on the relationship between pollution sources and in-stream water quality conditions.



A map showing the impaired waterbodies and watersheds in relation to the Etowah County MS4 is provided in **Appendix A** as **Figure 3**.

3.1.1 *Impaired Waterbodies Within the MS4*

Three impaired waterbodies are located within the Etowah County MS4 boundary.

Table 3-1 Impaired Waterbodies within the MS4

Waterbody	Impaired Segment	Type	Causes	Use
Black Creek (Neely Henry Lake)	AL03150106-0107-111	303(d)	Nutrients	F&W
Big Wills Creek (Neely Henry Lake)	AL03150106-0108-111	303(d)	Nutrients	F&W
Big Wills Creek	AL03150106-0108-102	303(d)	Pathogens (E. coli)	F&W
Coosa River (Neely Henry Lake)	AL03150106-0309-102	TMDL	Nutrients Organic enrichment (DO)	F&W

3.1.2 *Impaired Watersheds Intersecting the MS4*

In addition to the impaired waterbodies, the Etowah County MS4 encompasses portions of watersheds for the following impaired waterbodies:

Table 3-2 Portions of Impaired Watersheds within the MS4

Watershed	Impaired Segment	Type	Causes	Use
Black Creek (Neely Henry Lake)	AL03150106-0107-111	303(d)	Nutrients	F&W
Big Wills Creek (Neely Henry Lake)	AL03150106-0108-111	303(d)	Nutrients	F&W
Big Wills Creek	AL03150106-0108-102	303(d)	Pathogens (E. coli)	F&W



Watershed	Impaired Segment	Type	Causes	Use
Coosa River (Neely Henry Lake)	AL03150106-0204-102	TMDL	Nutrients pH Organic Enrichment (CBOD, NBOD) Priority Organics (PCBs)	PWS F&W
Coosa River (Neely Henry Lake)	AL03150106-0309-102	TMDL	Nutrients pH Organic Enrichment (CBOD, NBOD)	F&W

3.1.3 *Neely Henry Lake TMDL*

In 2008, the EPA approved TMDLs for Neely Henry Lake related to Nutrients (Total Phosphorous), pH, and Organic Enrichment/Dissolved Oxygen. The Etowah County MS4 directly and indirectly discharges to Neely Henry Lake; therefore, **the Etowah County MS4 is required to achieve a 30% reduction in Total Phosphorus discharge loading.**

Sources of nutrient and organic enrichment from non-point sources within the Coosa River watershed include:

- Runoff from pastures
- Runoff from animal operations
- Direct discharge to streams due to cattle
- Improper land application of animal waste
- Failing septic systems
- Urban runoff

Point source contributors of storm water pollution within the Coosa River watershed include:

- Discharge from wastewater treatment plants
- Discharge from industrial operations
- Sanitary sewer overflows

Part IV.D of the NPDES General Permit requires that the County implement Best Management Practices (BMPs) and control measures specifically targeted to achieve the waste load allocations prescribed in the TMDL. The County must also implement a monitoring program to document that the waste load allocations prescribed in the TMDL are being achieved.



4.0 Overall Program Evaluation

Reference Part VI.B.2

4.1 Major Accomplishments

During the 2021-2022 reporting period, the County completed 47 out of 48 planned strategies and 13 additional strategies. The number of completed activities (60) demonstrates the County's commitment to implement the SWMPP and Phase II Permit by going beyond the strategies they committed to in the 2017 SWMPP.

1. Revised the Storm Water Management Program Plan

Following the issuance of the 2021 MS4 permit, Etowah County contracted S&ME to develop a revised SWMPP meeting the requirements of the new permit. The new SWMPP is specific to Etowah County and incorporates many of the strategies employed by the County under the 2017 joint SWMPP that was prepared for the full urbanized area. The new SWMPP became effective on April 1, 2022 and is expected to further strengthen the Program.

2. Promoted public education

The County partnered with several groups to promote public education. The County previously partnered with Etowah County NRCS to distribute over 200 flyers and brochures related to storm water and soil preservation. Numerous events were held through Keep Etowah Beautiful. Over 2,000 students and almost 700 teachers and adult volunteers participated in *Message in a Bottle* and the *Etowah County Water Festival*. Four hundred and fifty-two volunteers participated in the Great American Cleanup.

3. Performed outfall inspections

Etowah County continued to perform outfall inspections as required by the MS4 permit. During the 2021-2022 reporting period, 16 of the 48 known outfalls were inspected, all of which were located in Priority Areas. Thirteen dry weather flows were observed at the outfalls and were screened in accordance with the procedures outlined in the 2017 IDDE Plan. No suspect discharges were discovered.

4.2 Overall Programs Strengths and Weaknesses

The County continues to evaluate the processes and procedures in which it accomplishes the objectives of the SWMPP. Their strengths and weaknesses remain very similar as past years.

The biggest strength is Keep Etowah County Beautiful (KEB). The County created KEB to plan, coordinate, document, and complete public educational and involvement activities to create a love for the county and to increase participation in cleanup activities. KEB is a significant strength of the Public Education and Involvement Control Measure. KEB not only contributes to the County's success, but also contributes to the success of the Cities within the County.



In Etowah County, Home Rule is limited by the State constitution. Counties have no general grant of power in the State Constitution and must go to the Alabama Legislature for authority to engage in any activity not currently authorized by the State Constitution. Authority may be granted through constitutional amendments or by an act of the legislature known as "local legislation." Etowah County currently does not have the authority to enact an illicit discharge ordinance and would require action from the Alabama Legislature to gain that ability. This is a weakness to the program that is unavoidable at this time.

Another weakness of the program is the small number of staff that can be dedicated exclusively to the performance of the duties required by the Phase II Permit. The County currently employs two individuals who are the primary executives of the storm water program. The County has an Engineering Department to assist with the storm water program responsibilities but does not currently have the ability to expand the Engineering Department for the storm water program; therefore, this weakness is expected to remain for several years.

4.3 Future Direction of the Program

During the upcoming reporting period, the County will work to adapt their program to meet the requirements of the reissued Phase II general permit and the revised SWMPP. The revised SWMPP will be incorporated into future operations and activities for the upcoming period.

Etowah County is committed to educating citizens on the SWMPP Program and how their actions can impact storm water and the Coosa River.

4.4 Overall Effectiveness of the SWMPP

Etowah County is proud of their efforts to achieve the objectives of the SWMPP. Based on this evaluation, the 2017 SWMPP appears to have been effective in meeting the objectives and requirements of the 2016 Phase II Permit.

4.5 Measurable Goals Not Performed

The County did not promote a *Water Quality Awareness Week* during the 2021-2022 reporting period. The associated events were either canceled or conducted virtually due to an increase in covid-19 cases. The County plans to promote *Water Quality Awareness Week* during the 2022-2023 reporting period.



5.0 Storm Water Monitoring Data Evaluation

Reference Part VI.B.5 and 8

5.1 Rationale Statement

As discussed in Section 3.0, the Etowah County MS4 currently discharges to an impaired waterbody for which a TMDL has been approved. Part V.A of the 2022 MS4 Permit requires that the SWMPP include a monitoring plan to assess the effectiveness of the BMPs in achieving the waste load reductions/allocations outlined in the TMDL.

The intent of the monitoring program is to evaluate the effectiveness of the County's BMPs in achieving the required phosphorous reduction as established in the TMDL and to generally evaluate overall water quality. Where deviations are documented and/or expected, the collected monitoring data will be used to determine the extent and cause of the pollutant of concern.

The 2017 Storm Water Monitoring Plan, including monitoring parameters, monitoring locations, field documentation, and sampling procedures, is described in Section 2 of the SWMPP dated January 1, 2017. A revised *Gadsden-Etowah Wet Weather Monitoring Plan* was included in the SWMPP submitted to ADEM on April 1, 2022. The changes identified in the 2022 Monitoring Plan will be implemented beginning with the 2022 second quarter monitoring event.

5.2 Monitoring Events

Beginning in January 2013, S&ME was retained by the Gadsden-Etowah Storm Water Steering Committee to collect the required quarterly surface water samples and provide analyses of the sampling events.

Table 5-1 Monitoring Events to Date

MS4 Reporting Period	Monitoring Event	Date(s) Monitoring Conducted
April 1, 2012 – March 31, 2013	2013 Q1	March 12 & 13, 2013
April 1, 2013 – March 31, 2014	2013 Q2	May 8 & 20, 2013
	2013 Q3	September 23, 2013
	2013 Q4	December 10, 2013
	2014 Q1	February 6, 2014
April 1, 2014 – March 31, 2015	2014 Q2	June 26, 2014
	2014 Q3	September 30, 2014
	2014 Q4	November 19, 2014
	2015 Q1	March 23, 2015



MS4 Reporting Period	Monitoring Event	Date(s) Monitoring Conducted
April 1, 2015 – March 31, 2016	2015 Q2	April 22, 2015
	2015 Q3	September 30, 2015
	2015 Q4	November 19, 2015
	2016 Q1	March 15, 2016
April 1, 2016 – March 31, 2017	2016 Q2	June 29, 2016
	2016 Q3	August 9, 2016
	2016 Q4	December 7, 2016
	2017 Q1	March 2, 2017
April 1, 2017 – March 31, 2018	2017 Q2	June 21, 29, 30 and July 5, 2017
	2017 Q3	August 16-17, 2017
	2017 Q4	October 25-26, 2017
	2018 Q1	March 27-28, 2018
April 1, 2018 – March 31, 2019	2018 Q2	June 26 and 29, 2018
	2018 Q3	August 1-2, 2018
	2018 Q4	December 10-11, 2018
	2019 Q1	April 15 and 17, 2019
April 1, 2019 – March 31, 2020	2019 Q2	June 11-12, 2019
	2019 Q3	August 27-28, 2019
	2019 Q4	October 29-30, 2019
	2020 Q1	March 30-31, 2020
April 1, 2020 – March 31, 2021	2020 Q2	June 10, 2020
	2020 Q3	September 21, 2020
	2020 Q4	December 17, 2020
	2021 Q1	March 18, 2021
April 1, 2021 – March 31, 2022	2021 Q2	May 5, 2021
	2021 Q3	September 2, 2021
	2021 Q4	November 23, 2021
	2022 Q1	January 10-11, 2022

A monitoring report was issued to the members of the Steering Committee following each monitoring event. Copies of the reports for the monitoring events conducted during the April 1, 2021 to March 31, 2022 reporting period are provided in **Appendix C**.



5.3 Addition and Removal of Monitoring Points

Following evaluation of the monitoring program in April 2022, monitoring points SME 2 and SME 8 were removed from the monitoring program and monitoring points SME 9 and SME 10 were added. The changes to the monitoring program will be implemented beginning with the 2022 second quarter sampling event. The monitoring locations are identified on Figure 2 in **Appendix A**.

5.3.1 *Unnamed Tributary from Hokes Bluff*

Monitoring point HB 3 was sited in 2012 to assess discharges from Hokes Bluff to the Coosa River; however, the watershed for the monitoring point also captures approximately 1.3 square miles of land not inside the urbanized area. Monitoring point SME 8 was added in December 2020 to monitor runoff from a portion of Hokes Bluff for comparison with the values obtained at HB 3. However, upon further evaluation of the watershed, SME 8 was determined to not be a representative background sample for HB 3. **Monitoring point SME 8 was removed from the monitoring program in April 2022.**

Monitoring point SME 9 was established on the blue-line stream that flows from Hokes Bluff to HB 3. The drainage area for SME 9 encompasses approximately 0.21 square miles of the HB 3 drainage area and includes residential, commercial, and light industrial land uses, as well as Hokes Bluff Elementary School. **Monitoring point SME 9 was added to the monitoring program in April 2022.**

5.3.2 *Big Cove Creek*

Monitoring point GD 5 was sited in 2012 to monitor discharges from Big Cove Creek into the Coosa River, but the drainage area for GD 5 includes 21.2 square miles of land not inside the urbanized area. To assess storm water discharges from the Hokes Bluff MS4, monitoring point SME 10 was sited where an unnamed tributary to Big Cove Creek leaves the east portion of the Hokes Bluff MS4. The drainage area for SME 10 encompasses approximately 0.57 square miles of the GD 5 drainage area and includes residential and commercial land uses. **Monitoring point SME 10 was added to the monitoring program in April 2022.**

5.3.3 *Monitoring Point SME 2*

In keeping with the recommendation made in the previous Annual Report, the Gadsden-Etowah MS4 has discontinued monitoring at SME 2. The SME 2 watershed is only 1.05 square miles and has very similar land use characteristics to the much larger GD 7 watershed. Past monitoring results at points GD 7 and SME 2 indicate similar results at both locations, suggesting that SME 2 is redundant. Monitoring point SME 2 was last sampled on January 10, 2022. **Monitoring point SME 2 was removed from the monitoring program in April 2022.**

5.4 Monitoring Results

A total of 37 quarterly monitoring events have been conducted since the Monitoring Program was first implemented in March of 2013. Charts 1 through 9 in **Appendix B** summarize the analytical data collected during these monitoring events.



5.4.1 *Monitoring Points AT 5 and SME 7*

Monitoring point SME 7 is located in Big Wills Creek, upstream of monitoring point AT 5. Monitoring point SME 7 was first sampled in December 2020, and a total of six monitoring events have been completed.

Nitrate-nitrite and ortho-phosphate decreased between SME 7 and AT 5 in five out of the last six monitoring events, and total phosphorus has decreased between the two points in the last six events. These results indicate that a reduction in pollutant concentrations is occurring as Big Wills Creek passes through the Attalla, Etowah County, and Gadsden MS4s, possibly due to dilution as other waterbodies and runoff enter Big Wills Creek. This further indicates that the urbanized area is not contributing additional pollution to the waterbody.

The Gadsden-Etowah MS4 will continue to monitor points SME 7 and AT 5 during the April 1, 2022 to March 31, 2023 reporting period.

5.4.2 *Monitoring Point SME 1*

Monitoring point SME 1 was sited to observe water quality at the location where the combined flow from Big Wills Creek, Black Creek, and Horton Creek enters the Coosa River. Monitoring point AT 5 is located in Big Wills Creek, monitoring point GD 8 is located in Black Creek and monitoring point RC 2 is located in Horton Creek. The monitoring points were first sampled in March 2013, and a total of 37 monitoring events have been completed.

Generally, nitrogen and phosphorous results at AT 5 are higher than those recorded at SME 1, whereas nitrogen and phosphorous values at RC 2 and GD 8 are lower than those recorded at SME 1. These results seem to indicate that a reduction in pollutant concentrations is occurring in Big Wills Creek before the combined flow from AT 5, GD 8, and RC 2 discharges to the Coosa River. A portion of that reduction may come from dilution as other waterbodies and runoff join Big Wills Creek. This further indicates that the urbanized area is not contributing additional pollution to the waterbody.

The Gadsden-Etowah MS4 will continue to monitor points AT 5, GD 8, RC 2, and SME 1 during the April 1, 2022 to March 31, 2023 reporting period.

5.4.3 *Monitoring Point SS 14*

Monitoring point SS 14 was sited to observe water quality in an unnamed tributary to the Coosa River in Southside. The drainage area for SS 14 includes portions of the Southside and Etowah County MS4s, as well as areas outside of the Gadsden-Etowah MS4. Land uses in the SS 14 drainage area include residential, commercial, recreational, and agricultural.

As shown in Charts 6 and 7, ortho-phosphate and total phosphorous concentrations at SS 14 are consistently higher than other locations within the MS4. The monitoring results for ortho-phosphate and total phosphorous at SS 14 indicate that concentrations in the unnamed tributary are higher than those observed in the Coosa River; however, there is no clear increase in the levels of phosphorus and ortho-phosphate in the receiving water between SME 5 (Coosa River upstream of SS 14) and SME 6 (Coosa River downstream of SS 14). This seems to indicate that although levels of certain pollutants are elevated at SS 14, the flow from the unnamed tributary is not sufficient to cause an observable impact on the Coosa River.



The Gadsden-Etowah MS4 will continue to monitor points SS 14, SME 5, and SME 6 during the April 1, 2022 to March 31, 2023 monitoring period.

5.4.4 *Monitoring Points SME 4, SME 5, and SME 6*

Monitoring points SME 4, 5, and 6 were sited to assess water quality in the Coosa River where it enters the urbanized area, in the central portion of the urbanized area, and where it leaves the urbanized area, respectively. The points were first sampled in December 2020, and a total of six monitoring events have been completed since, with the exception of SME 4 which was not sampled in September 2021.

Over the past six monitoring events, turbidity increased between monitoring points SME 4 and SME 6 three times and decreased twice, with one event not sampled. Total nitrogen increased in three of the six monitoring events and TSS increased in four of the six events. Ortho-phosphate and total phosphorous were not detected in the five events. There is currently insufficient data to fully assess the impacts of discharges from the urbanized area on the Coosa River.

The Gadsden-Etowah MS4 will continue to monitor points SME 4, SME 5, and SME 6 during the April 1, 2022 to March 31, 2023 reporting period.

5.5 **Statistical Analysis**

5.5.1 *Overview*

Statistical analysis was performed on the cumulative monitoring data to determine whether there has been a statistically significant increase (SSI) of concentrations between specific monitoring points.

For the current statistical analysis, S&ME performed the statistical evaluation using the ChemStat Version 4.0 software produced by Starpoint Software. The appropriate statistical procedure used in this evaluation was determined by the characteristics of the data set. The approach used to determine the appropriate statistical evaluation and the results of the statistical evaluation are summarized in the following paragraphs.

Specific monitoring points were chosen for comparison based on their location within the MS4 area respective to other monitoring point locations and trend of collected data. Detailed results are given in **Appendix B**.

5.5.2 *Approach to Statistical Analysis*

Essentially, there are two sets of data to be compared during this statistical evaluation. The Wilcoxon rank-sum test evaluates potential differences in the medians of two populations. The Wilcoxon rank-sum test can be used to compare a single data group against another data group. In this evaluation, we compared the specific monitoring points to determine if a statistically significant difference is present in a monitoring point using a statistical significance value (alpha) of 0.01. If a statistically significant difference was observed, we then compared the median values of each point to evaluate whether a point had a statistically significant increase (SSI) over the background point.



Sen's non-parametric estimator of slope is a method of estimating the slope (change in concentration over time) of the data. Because this method is non-parametric, it is suitable for high percentage of non-detects and is not significantly affected by outliers. The result indicates whether there is an upward, downward, or no trend in the concentration data. Sen's slope estimates were produced for points for which an SSI was observed.

The following field and laboratory parameters were evaluated in the statistical analysis:

- Turbidity
- pH
- DO
- Temperature
- Total Suspended Solids (TSS)
- Total Phosphorous
- Orthophosphate
- Nitrate-Nitrite
- Total Kjeldahl Nitrogen (TKN)

5.5.3 Results and Discussion of Statistical Evaluation

Table 5-2 below reports the statistical evaluation for each analyte for a summary of compared monitoring points.

Table 5-2 Summary of Results of Statistical Analysis

Upstream Monitoring Point	Downstream Monitoring Point	Downstream Monitoring Point SSI Identified	Parameters w/ SSI	Sen's Slope Estimator
SME 4	SME 6	No	-	-
SME 7	AT 5	No	-	-
AT 5	SME 1	Yes	pH	Downward
SME 7	SME 1	No	-	-
RC 2	SME 1	Yes	Ortho-phosphate	No Trend
			pH	Downward
			Total Phosphorus	No Trend
			TSS	No Trend
GD 8	SME 1	Yes	Ortho-phosphate	No Trend
			Total Phosphorus	No Trend
			TSS	No Trend
			Turbidity	No Trend
SME 4	SME 1	Yes	Ortho-phosphate	No Trend



In the past, monitoring point AT 5 (Big Wills Creek) has shown elevated concentrations of pollutants. Monitoring point SME 7 was added upstream to be a background point for AT 5. The results of the statistical analysis indicate that there is no SSI at AT 5 from SME 7, meaning that values recorded at SME 7 were not consistently higher than those at AT 5. This seems to indicate that dilution is occurring as Big Wills Creek flows through the urbanized area and that the Attalla, Etowah County, and Gadsden MS4s do not appear to be contributing to an increase in pollutants in Big Wills Creek.

Monitoring point SME 1 is located downstream of the confluence of Big Wills Creek, Horton Creek, and Black Creek. Of the monitored parameters, only pH was observed to have an SSI between AT 5 (Big Wills Creek) and SME 1 for pH. An SSI was observed for ortho-phosphate, pH, total phosphorus, and TSS between RC 2 (Horton's Creek) and SME 1. An SSI was observed for ortho-phosphate, total phosphorus, TSS, and turbidity between GD 8 (Black Creek) and SME 1. The increase in pollutants from the upstream points to the point where all three waterbodies converge is an expected observation. There is no trend in the data at SME 1 except for a downward trend in pH, indicating that the observed pollutants are not increasing over time.

No SSI for ortho-phosphate or total phosphorus was indicated from AT 5 to SME 1, while SME 1 was consistently higher than RC 2 and GB 8. The results of the statistical analysis seem to indicate that the majority of the pollutants observed at SME 1 can be attributed to Big Wills Creek.

An SSI was observed for ortho-phosphate between SME 4 where the Coosa enters the MS4 and SME 1 where Big Wills Creek/Black Creek meets the Coosa, meaning that ortho-phosphate concentrations from Big Wills Creek are consistently higher than those observed in the main channel upstream of the urbanized area. However, an SSI was not observed between SME 4 and SME 6 in the Coosa. This seems to indicate that sufficient dilution is occurring in the urbanized area to offset pollutants being transported in Big Wills Creek, Horton Creek, and Black Creek and that the urbanized area is not contributing additional pollution to the waterbodies; however, there is currently insufficient data to fully assess the impacts of discharges from the urbanized area on the Coosa River.

The SSIs observed between points within the Coosa River and points on tributaries to the river indicate that concentrations of certain pollutants in the tributaries are higher than those in the river. Based on the past six monitoring events, no SSI was observed between the monitoring point upstream of the urbanized area (SME 4) and the point downstream of the urbanized area (SME 6), indicating that discharges from the tributaries and the urbanized area are not significantly affecting water quality in the Coosa. Additional monitoring is needed to fully assess the impacts of discharges from the urbanized area on the Coosa River.

The detailed results of the statistical analysis obtained from the ChemStat software are provided in **Appendix B**.

5.6 Summary of Recommendations

The entities that comprise the Gadsden-Etowah MS4 took a watershed approach regarding their Storm Water Monitoring Plan. This approach has allowed them to see how the overall watershed is responding to the established BMPs and to generally evaluate water quality across the MS4.

A revised *Wet-Weather Monitoring Program* was prepared in 2022 and will go into effect April 2022. The Gadsden-Etowah MS4 entities plan to continue the watershed approach and proposes the following revisions to the Storm Water Monitoring Plan.



- Addition of monitoring points SME 9 and SME 10
- Removal of monitoring points SME 2 and SME 8

6.0 Narrative Report of Minimum Storm Water Control Measures

Reference Part VI.B.3 and 4

6.1 Public Education and Public Involvement on Storm Water Impacts

6.1.1 *Implementation Status*

During the April 1, 2021 to March 31, 2022 reporting period, Etowah County completed ten (10) of the eleven (11) Public Education and Public Involvement strategies identified in the previous Annual Report and the 2017 SWMPP. The County did not complete one (1) strategy:

- *Water Quality Awareness Week* was cancelled due to an outbreak of Covid-19 (Activity 4).

The County also completed six (6) strategies beyond those proposed in the previous Annual Report and the 2017 SWMPP. These strategies included:

- Partnering with Advanced Disposal to provide free garbage disposal days at several locations across County (Activity 12)
- Sponsoring a Drug Collection Day (Activity 13)
- Supporting the Adopt-A-Mile Program by providing trash bags for cleanup, maintaining the Adopt-A-Mile signs, and disposing of the garbage collected (Activity 14)
- Enforcing a Litter Ordinance (Activity 15)
- Utilizing County inmates to collect trash from County rights-of-way (Activity 16)
- Participating in the Alabama Stormwater Associations (Activity 17)

A table identifying each Public Education and Public Involvement strategy planned for the 2021-2022 reporting period, a description of actions taken by Etowah County, and a description of activities planned for the next reporting period is provided in **Appendix D**. Supporting documentation is also included in **Appendix D**.

6.1.2 *Proposed Activities for the April 1, 2022 to March 31, 2023 Reporting Period*

Etowah County renewed its permit during the reporting period. The new permit went into effect October 1, 2021 with an expiration date of September 30, 2026. The County prepared and submitted a revised SWMPP meeting the requirements of the re-issued permit. The 2022 SWMPP became effective on April 1, 2022.

The County will implement the activities listed in the 2022 SWMPP and in the tables in **Appendix D** as part of their Public Education and Public Involvement Program during the 2022-2023 reporting period.



6.1.3 *Assessment of Controls*

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Public Education and Public Involvement Control Measure as outlined in the 2016 permit. The strategies are adequate to educate the community about the impacts of storm water runoff, identify steps the community can take to help reduce pollutants, and provide opportunities for public involvement.

6.1.4 *Proposed Changes*

Revisions to the Public Education and Public Involvement strategies were incorporated into the revised SWMPP submitted to ADEM on April 1, 2022.

6.1.5 *Responsible Parties*

The **Engineering Department** is responsible for overseeing, developing, and coordinating the Public Education and Public Involvement efforts. The Engineering Department is also responsible for providing content for the Storm Water Webpage and performing plat review regarding drainage and flood control.

6.2 **Illicit Discharge Detection and Elimination**

6.2.1 *Implementation Status*

During the April 1, 2021 to March 31, 2022 reporting period, Etowah County completed seventeen (17) of the seventeen (17) Illicit Discharge Detection and Elimination strategies identified in the previous Annual Report and the 2017 SWMPP.

A table identifying each Illicit Discharge Detection and Elimination strategy planned for the 2021-2022 reporting period, a description of actions taken by Etowah County, and a description of activities planned for the next reporting period is provided in **Appendix E**. Supporting documentation is also included in **Appendix E**.

6.2.2 *Proposed Activities for the April 1, 2022 to March 31, 2023 Reporting Period*

Etowah County renewed its permit during the reporting period. The new permit went into effect October 1, 2021 with an expiration date of September 30, 2026. The County prepared and submitted a revised SWMPP meeting the requirements of the re-issued permit. The 2022 SWMPP became effective on April 1, 2022.

The County will implement the activities listed in the 2022 SWMPP and in the tables in **Appendix E** as part of their Illicit Discharge Detection and Elimination Program during the 2022-2023 reporting period.

6.2.3 *Assessment of Control*

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Illicit Discharge Detection and Elimination Control Measure as outlined in the 2016 permit. The strategies are adequate to prevent or correct illicit discharges to the Gadsden-Etowah MS4.



6.2.4 *Proposed Changes*

Revisions to the Illicit Discharge Detection and Elimination strategies were incorporated into the revised SWMPP submitted to ADEM on April 1, 2022.

6.2.5 *Responsible Party*

The **Engineering Department** is responsible for overseeing, developing, and coordinating the IDDE program in the Etowah County regulated MS4 area.

6.3 **Construction Site Storm Water Runoff**

6.3.1 *Implementation Status*

During the April 1, 2021 to March 31, 2022 reporting period, Etowah County completed five (5) of the five (5) Construction Site Storm Water Runoff strategies identified in the previous Annual Report and the 2017 SWMPP.

A table identifying each Construction Site Storm Water Runoff strategy planned for the 2021-2022 reporting period, a description of actions taken by Etowah County, and a description of activities planned for the next reporting period is provided in **Appendix F**. Supporting documentation is also included in **Appendix F**.

6.3.2 *Proposed Activities for the April 1, 2022 to March 31, 2023 Reporting Period*

Etowah County renewed its permit during the reporting period. The new permit went into effect October 1, 2021 with an expiration date of September 30, 2026. The County prepared and submitted a revised SWMPP meeting the requirements of the re-issued permit. The 2022 SWMPP became effective on April 1, 2022.

The County will implement the activities listed in the 2022 SWMPP and in the tables in **Appendix F** as part of their Construction Site Storm Water Runoff Control Measure during the 2022-2023 reporting period.

6.3.3 *Assessment of Controls*

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Construction Site Storm Water Runoff Control Measure as outlined in the 2016 permit. The strategies are adequate to monitor, and control pollutants associated with land disturbing activities.

6.3.4 *Proposed Changes*

Revisions to the Construction Site Storm Water Runoff strategies were incorporated into the revised SWMPP submitted to ADEM on April 1, 2022.

6.3.5 *Responsible Party*

The **Engineering Department** is responsible for implementing the Construction Site Storm Water Runoff Control Program.



6.4 Post-Construction Storm Water Management in New Development and Redevelopment

6.4.1 *Implementation Status*

During the April 1, 2021 to March 31, 2022 reporting period, Etowah County completed seven (7) of the seven (7) Post-Construction Storm Water Management strategies identified in the previous Annual Report and the 2017 SWMPP.

Etowah County also completed one (1) additional strategy beyond those proposed in the previous Annual Report and the 2017 SWMPP. This strategy was:

- Installing erosion countermeasures along the highways where applicable (Activity 8)

A table identifying each Post-Construction Storm Water Management strategy planned for the 2021-2022 reporting period, a description of actions taken by Etowah County, and a description of activities planned for the next reporting period is provided in **Appendix G**. Supporting documentation is also included in **Appendix G**.

6.4.2 *Proposed Activities for the April 1, 2022 to March 31, 2023 Reporting Period*

Etowah County renewed its permit during the reporting period. The new permit went into effect October 1, 2021 with an expiration date of September 30, 2026. The County prepared and submitted a revised SWMPP meeting the requirements of the re-issued permit. The 2022 SWMPP became effective on April 1, 2022.

The County will implement the activities listed in the 2022 SWMPP and in the tables in **Appendix G** as part of their Post-construction Storm Water Management Control Measure during the 2022-2023 reporting period.

6.4.3 *Assessment of Control*

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Post-construction Storm Water Management Control Measure as outlined in the 2016 permit. The strategies are adequate to address post-construction storm water runoff from new development and re-development.

6.4.4 *Proposed Changes*

Revisions to the Post-construction Storm Water Management strategies were incorporated into the revised SWMPP submitted to ADEM on April 1, 2022.

6.4.5 *Responsible Party*

The **Engineering Department** is responsible for establishing design criteria for subdivision storm drainage systems, evaluating the Subdivision Regulations, reviewing submitted subdivision plats, and performing inspections of County-owned post-construction BMPs.



6.5 Pollution Prevention and Good Housekeeping for Municipal Operations

6.5.1 *Implementation Status*

During the April 1, 2021 to March 31, 2022 reporting period, Etowah County completed eight (8) of the eight (8) Pollution Prevention and Good Housekeeping for Municipal Operations strategies identified in the previous Annual Report and the 2017 SWMPP.

Etowah County also completed six (6) strategies beyond those proposed in the previous Annual Report and the 2017 SWMPP. These strategies include:

- Removing dead animals from the roadside (Activity 9)
- Clearing and removing trees and brush from drainage ways as needed (Activity 10)
- Partnering with Advanced Disposal to provide open-top containers at several locations (Activity 11)
- Supporting the Adopt-A-Mile Program by providing trash bags for cleanup, maintaining the Adopt-A-Mile signs, and disposing of the garbage collected (Activity 12)
- Maintaining "No Dumping" signs (Activity 13)
- Participating in continuing education provided by the Alabama Storm Water Association (Activity 14)

A table identifying each Pollution Prevention and Good Housekeeping for Municipal Operations strategy planned for the 2021-2022 reporting period, a description of actions taken by Etowah County, and a description of activities planned for the next reporting period is provided in **Appendix H**. Supporting documentation is also included in **Appendix H**.

6.5.2 *Proposed Activities for the April 1, 2022 to March 31, 2023 Reporting Period*

Etowah County renewed its permit during the reporting period. The new permit went into effect October 1, 2021 with an expiration date of September 30, 2026. The County prepared and submitted a revised SWMPP meeting the requirements of the re-issued permit. The 2022 SWMPP became effective on April 1, 2022.

The County will implement the activities listed in the 2022 SWMPP and in the tables in **Appendix H** as part of their Pollution Prevention and Good Housekeeping for Municipal Operations Control Measure during the 2022-2023 reporting period.

6.5.3 *Assessment of Control*

The strategies enacted during the reporting period appear to be effective in meeting the objectives of the Pollution Prevention and Good Housekeeping for Municipal Operations Control Measure as outlined in the 2016 permit. The strategies are adequate to address storm water pollution prevention from municipal operations.

6.5.4 *Proposed Changes*

Revisions to the Pollution Prevention and Good Housekeeping for Municipal Operations strategies were incorporated into the revised SWMPP submitted to ADEM on April 1, 2022.



6.5.5 Responsible Party

The **Engineering Department** will be responsible for conducting the County facility evaluations and maintaining records of the facility inspections. The Engineering Department is also responsible for coordinating the annual reviews of the SOPs, performing roadway maintenance, and coordinating litter reduction efforts.

7.0 Notice of Reliance

Reference Part VI.B.6

7.1 Steering Committee

The Gadsden-Etowah Steering Committee was first established in 2011 following re-issuance of the joint permit. The intent of the steering committee was to provide for coordination between the co-permittees. When the joint permit was superseded by the separate permits in 2016, the committee continued to work together to produce and implement a joint SWMPP and monitoring program.

The Steering Committee will continue under the 2021 permit. Despite the preparation of individual SWMPPs for each entity, the Gadsden-Etowah MS4 entities remaining committed to partnership and joint implementation of the monitoring program.

Each of the seven entities provide at least one member to the Gadsden-Etowah Storm Water Steering Committee. Each entity is responsible for providing the required annual updates and monitoring data to the Steering Committee.

Table 7-1 MS4 Storm Water Steering Committee

Entity	Contact	Phone Number	Email
City of Gadsden	Jeremy Ward	256-549-4527	jward@cityofgadsden.com
City of Gadsden	Heath Williamson	256-549-4520	hwilliamson@cityofgadsden.com
City of Attalla	Jason Nicholson	256-441-9200	jnicholson@attallacity.org
City of Rainbow City	Joel Garmon	256-413-1230	jgarmon@rbcalabama.com
City of Southside	Judd Rich	256-442-9775 Ext. 131	jrich@cityofsouthside.com
City of Glencoe	Todd Means	256-492-1424	toddmeans@cityofglencoe.net
City of Hokes Bluff	Lisa Johnson	256-492-2414	hbcity@cityofhokesbluff.net
Etowah County	Robert Nail	256-549-5358	rnail@etowahcounty.org

7.2 Monitoring Program

The monitoring program initially developed in 2011 to evaluate compliance with the Neely Henry Lake TMDL consist of quarterly wet-weather monitoring in several water bodies across the Gadsden-Etowah MS4. The City of



Attalla, the City of Gadsden, the City of Glencoe, the City of Hokes Bluff, City of Rainbow City, the City of Southside, and Etowah County entered into a Cooperative Agreement on March 24, 2015 to jointly ensure the quarterly monitoring was performed.

The submission of individual SWMPPs and Annual Reports for each entity will require modification of the 2015 monitoring agreement. The Gadsden-Etowah Steering Committee will establish a revised cooperative agreement for the quarterly monitoring by March 31, 2023.

8.0 Agency Certification

Reference Parts VI.A.2 and VII.G

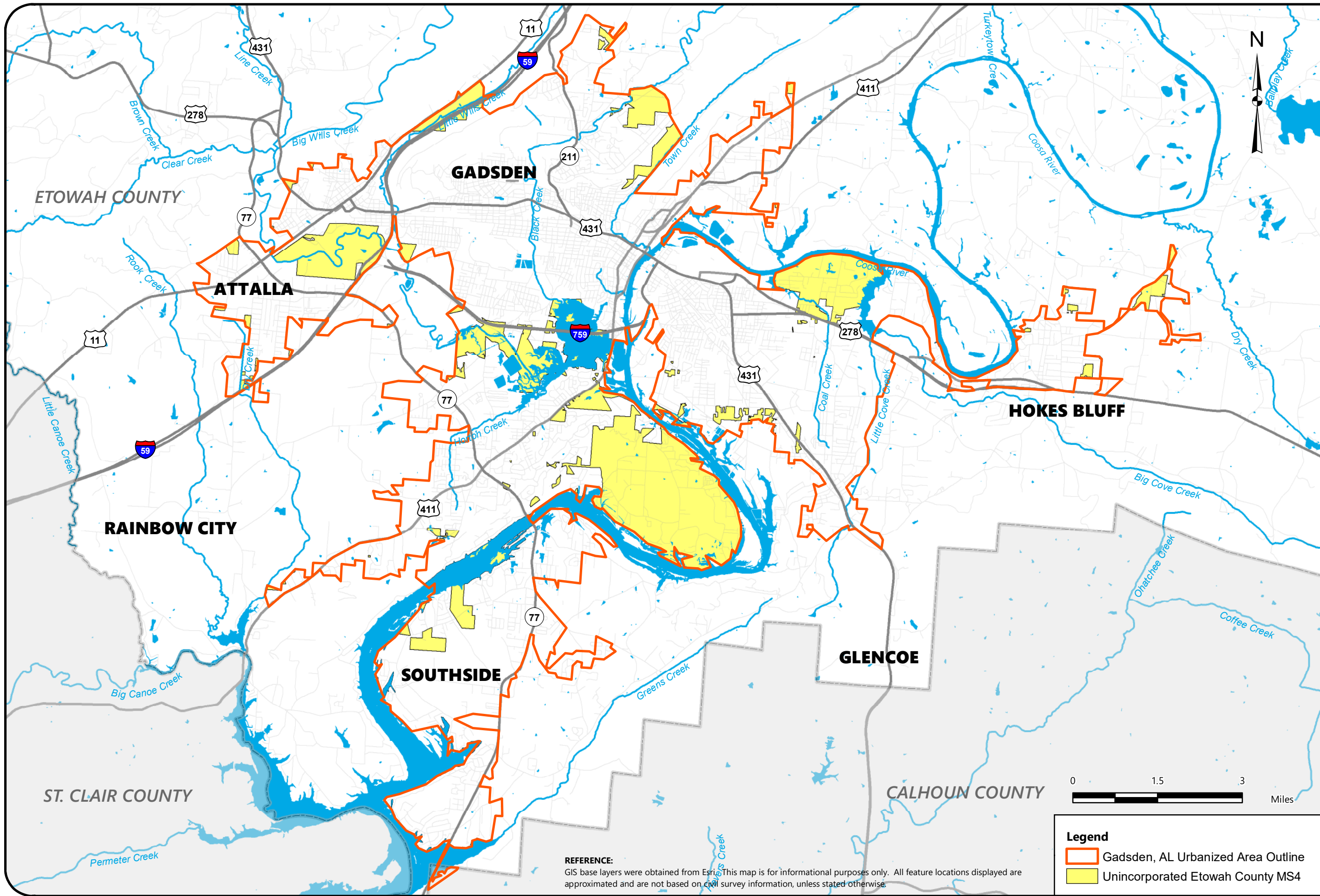
I certify under penalty of law that this document and all attachments pertaining to Etowah County were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted 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 or imprisonment for knowing violations.

Shane Ellison, Chief Administrative Officer
Etowah County, Alabama

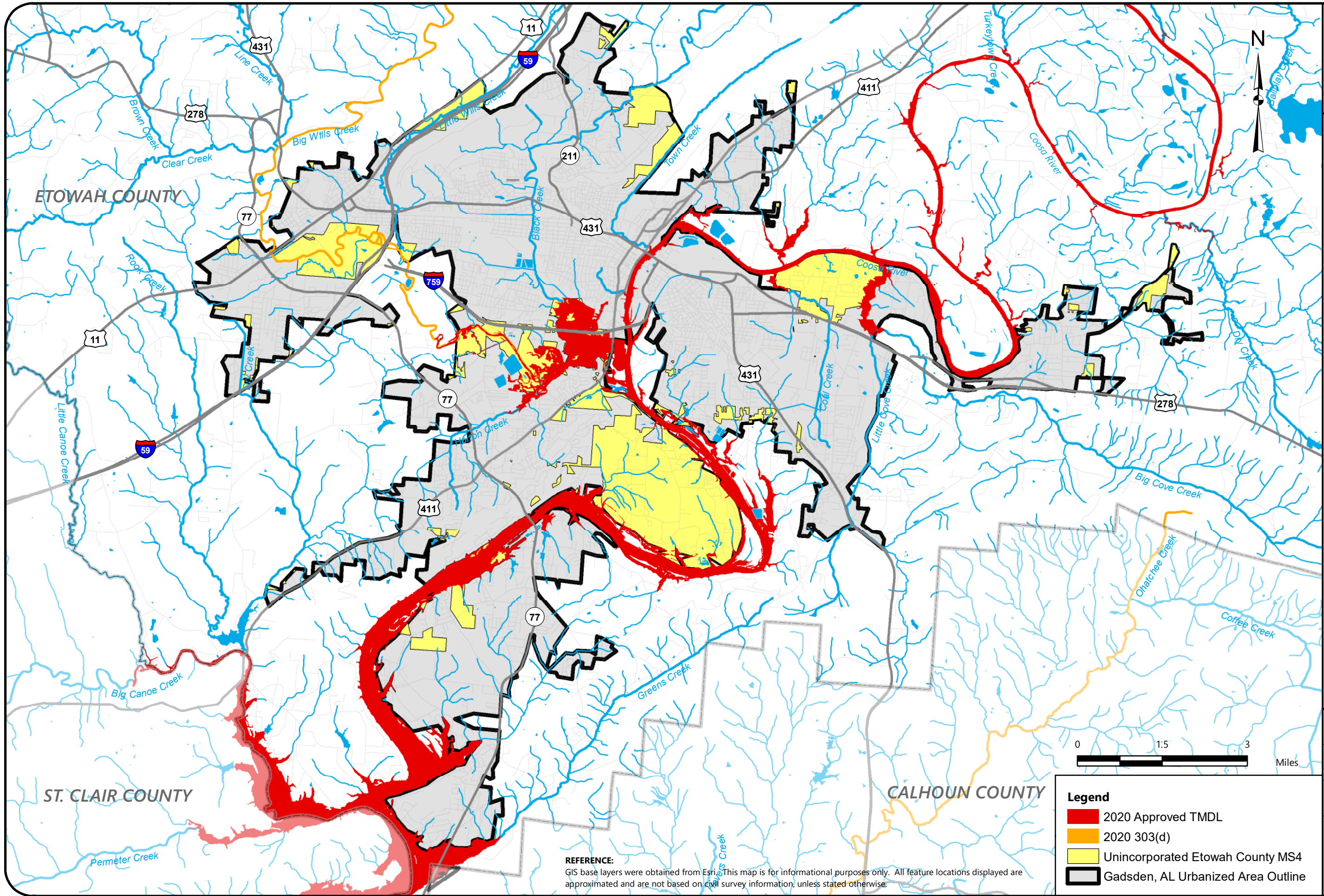
Date

Appendices

Appendix A – Figures



ETOWAH COUNTY MS4 BOUNDARIES	
ETOWAH COUNTY MS4	PHASE II SMALL MUNICIPAL SEPARATE STORM SEWER SYSTEM NPDES GENERAL PERMIT ALR040009
SCALE: 1:100,000	
DATE: 03/24/2022	
PROJECT NUMBER 215660G	
FIGURE NO. 2	



IMPAIRED WATERBODIES

ETOWAH COUNTY MS4
PHASE II SMALL MUNICIPAL SEPARATE STORM SEWER SYSTEM
NPDES GENERAL PERMIT ALR040009

SCALE:
1:100,000

DATE:
03/25/2022

PROJECT NUMBER
215660G

FIGURE NO.

3

Appendix B – Charts and Statistics

CHART 1 - TURBIDITY ANALYTICAL DATA

GADSDEN-ETOWAH MS4 MONITORING

NPDES PERMIT NO. ALR040009

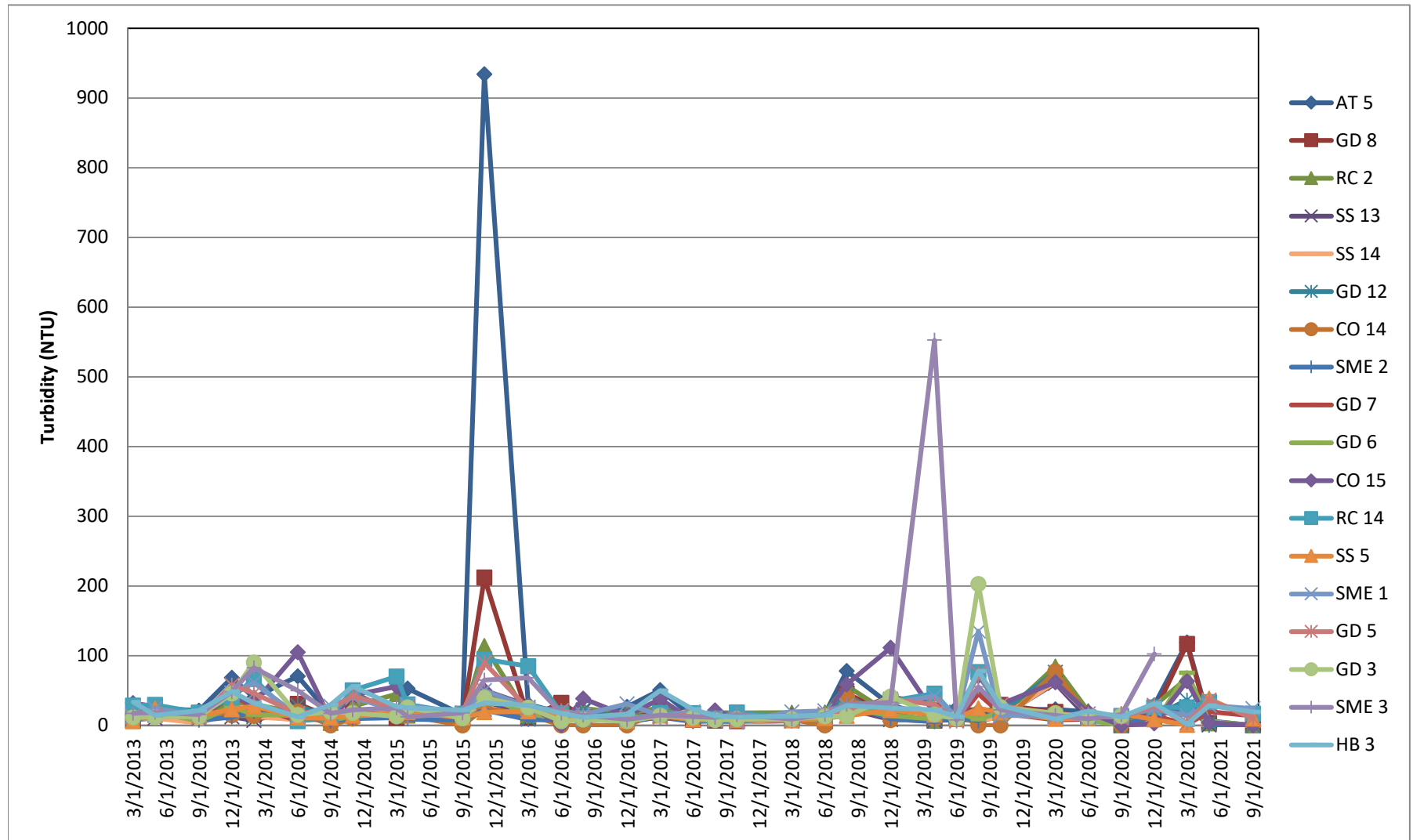
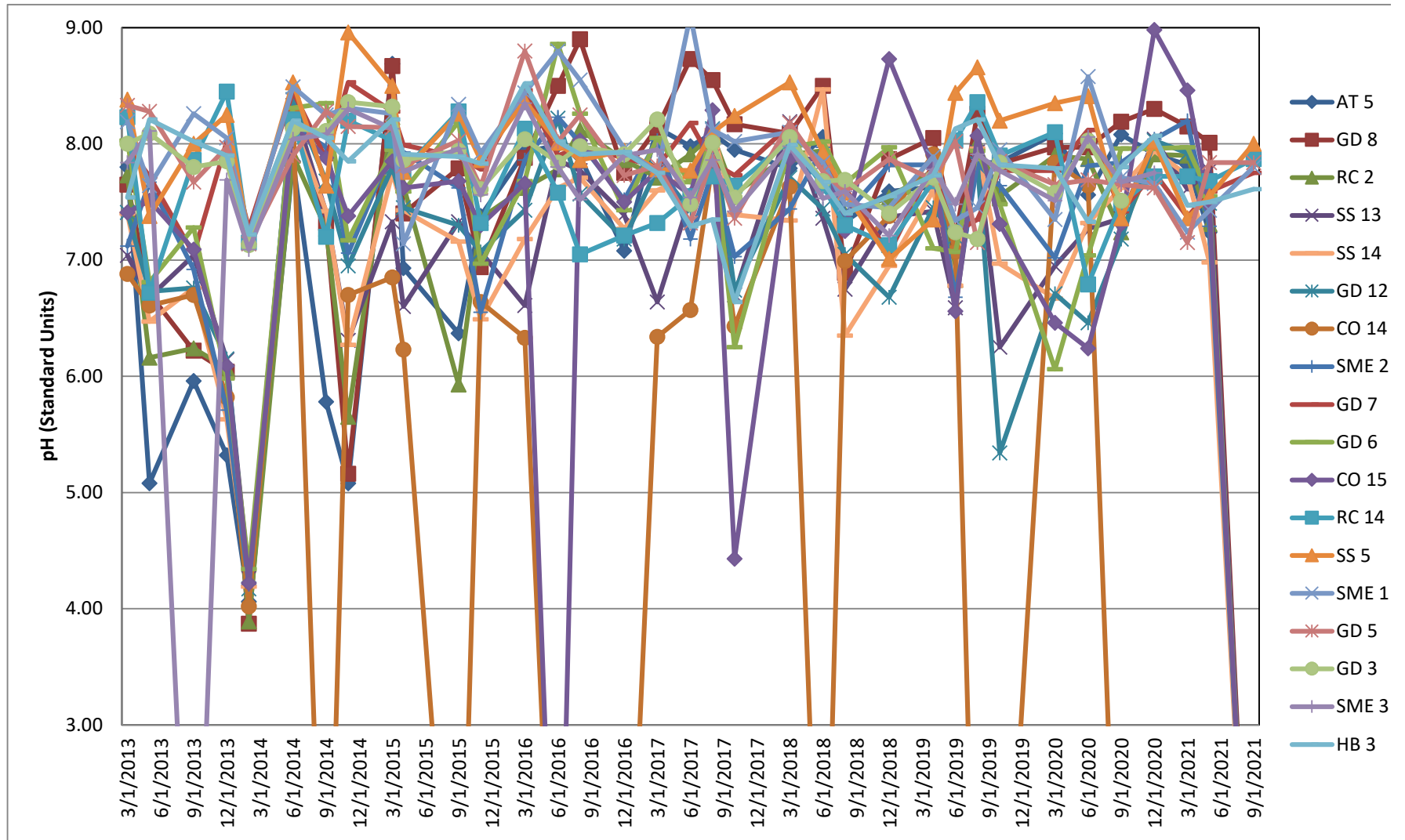


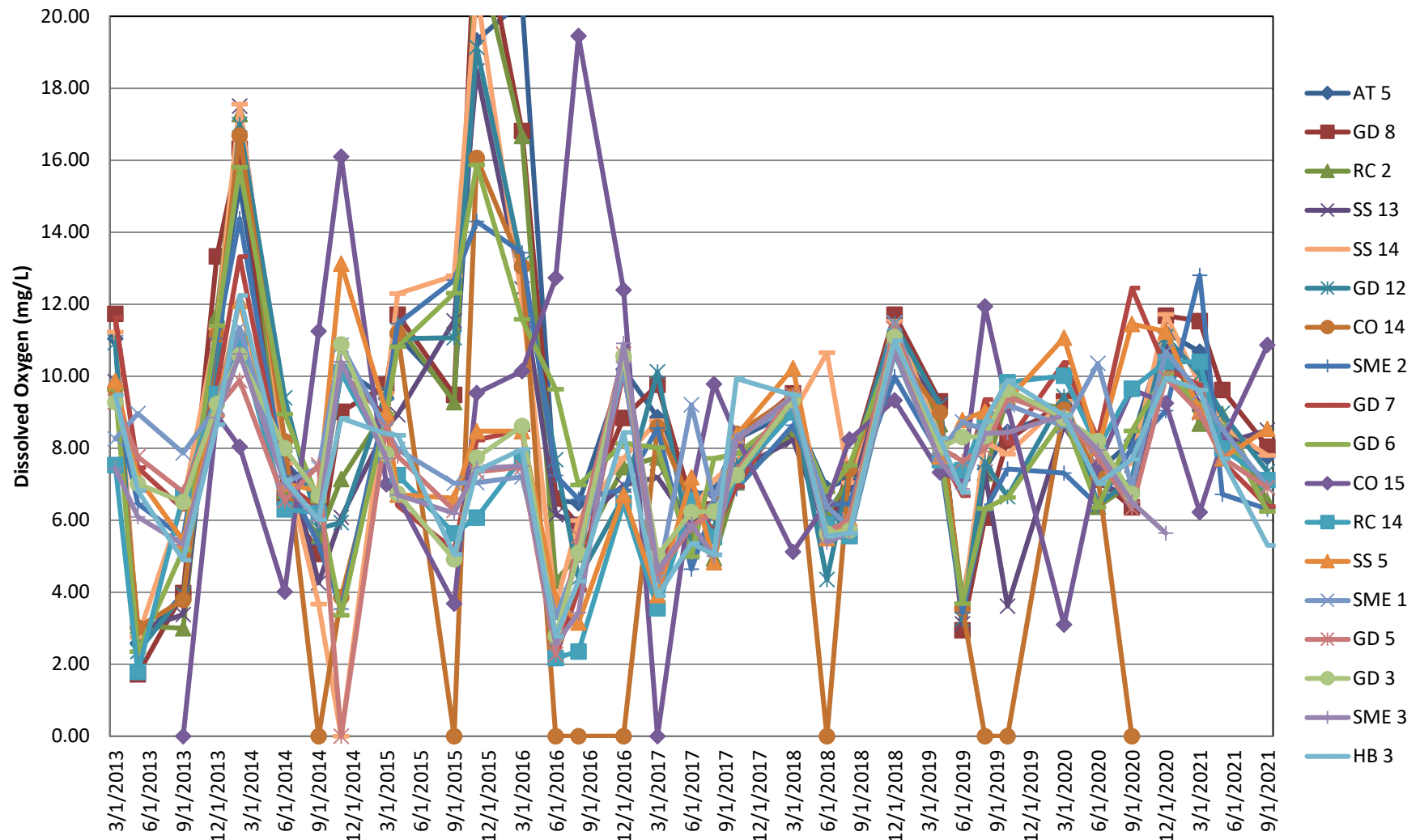
CHART 2 - pH ANALYTICAL DATA

GADSDEN-ETOWAH MS4 MONITORING

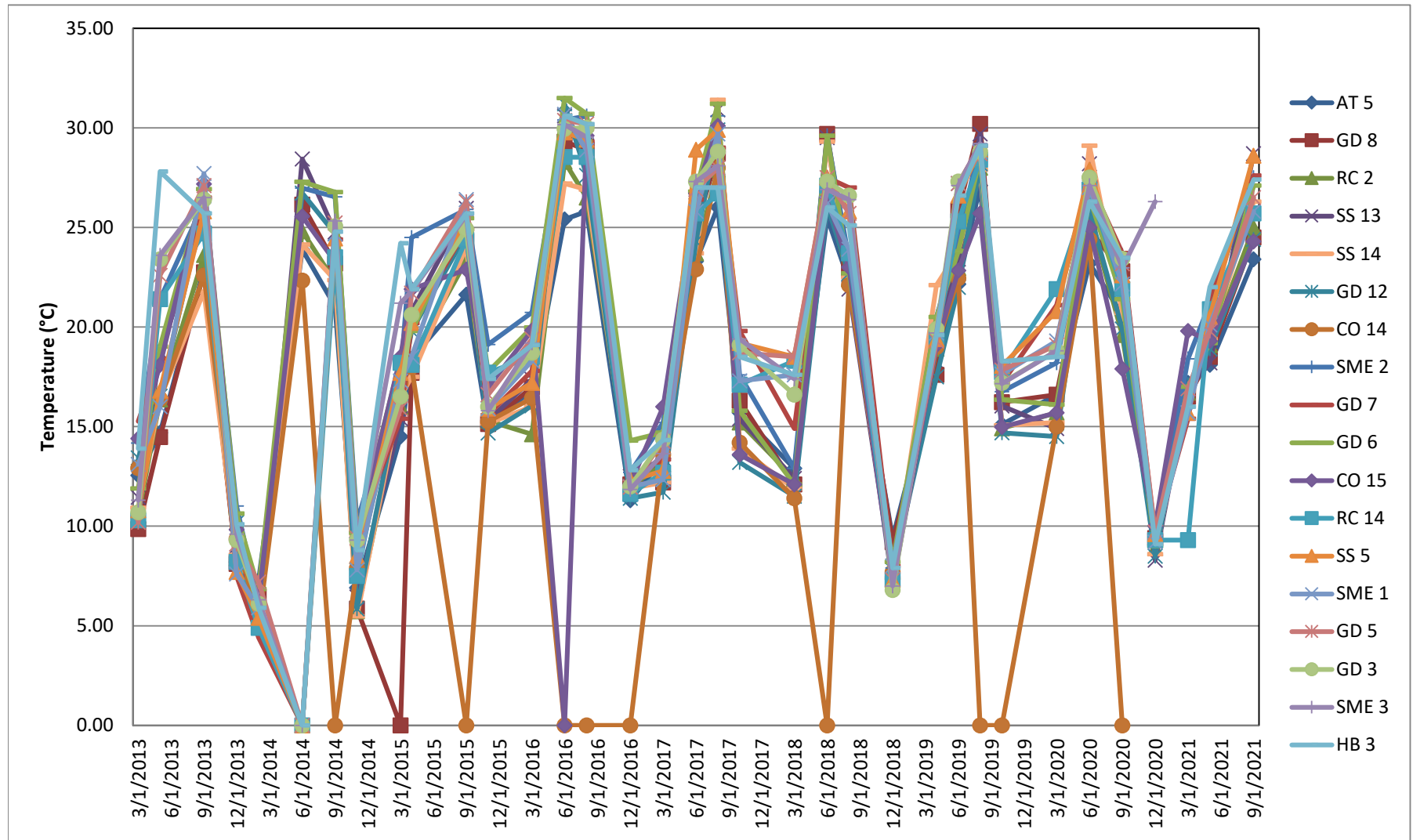
NPDES PERMIT NO. ALR040009



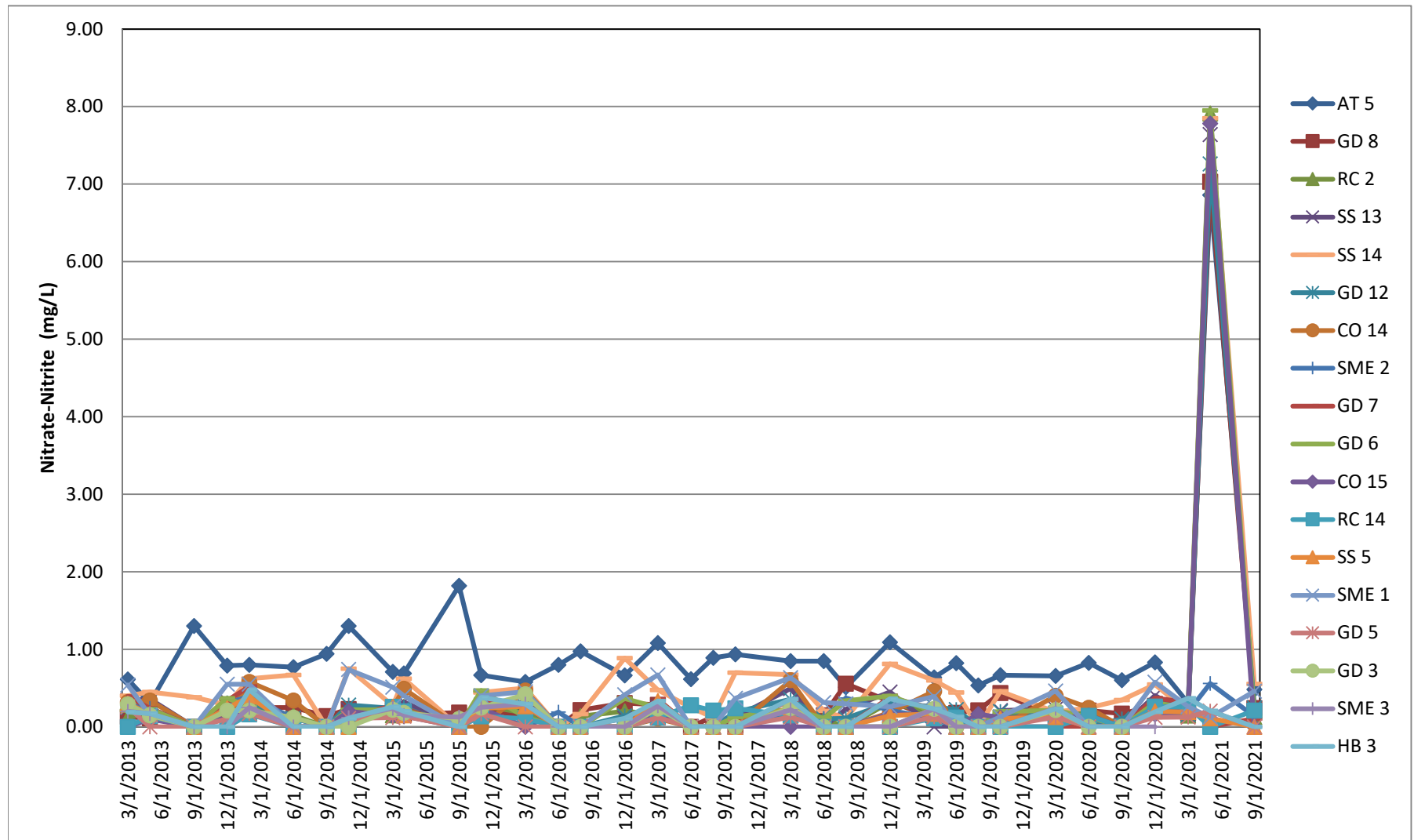
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NPDES PERMIT NO. ALR040009**



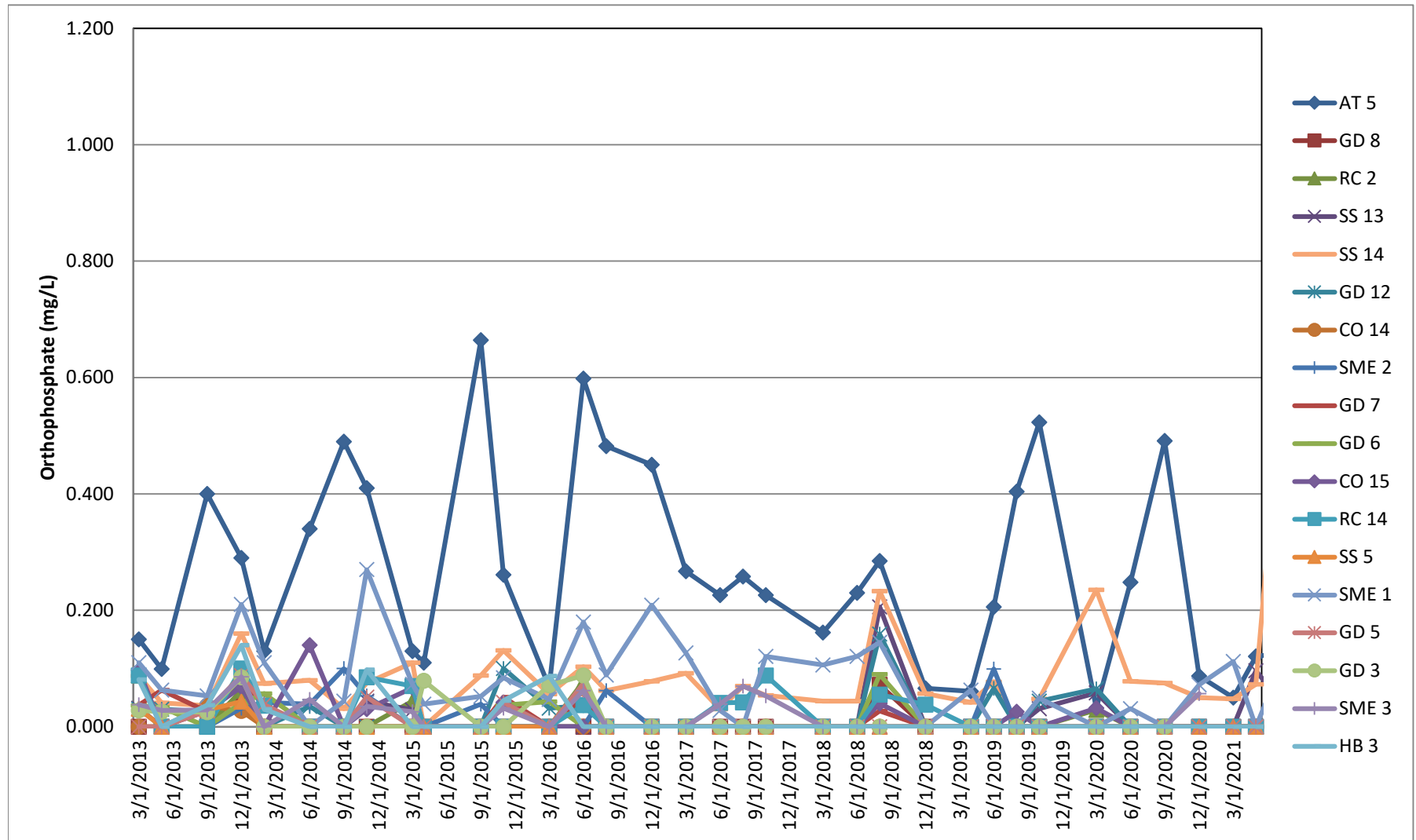
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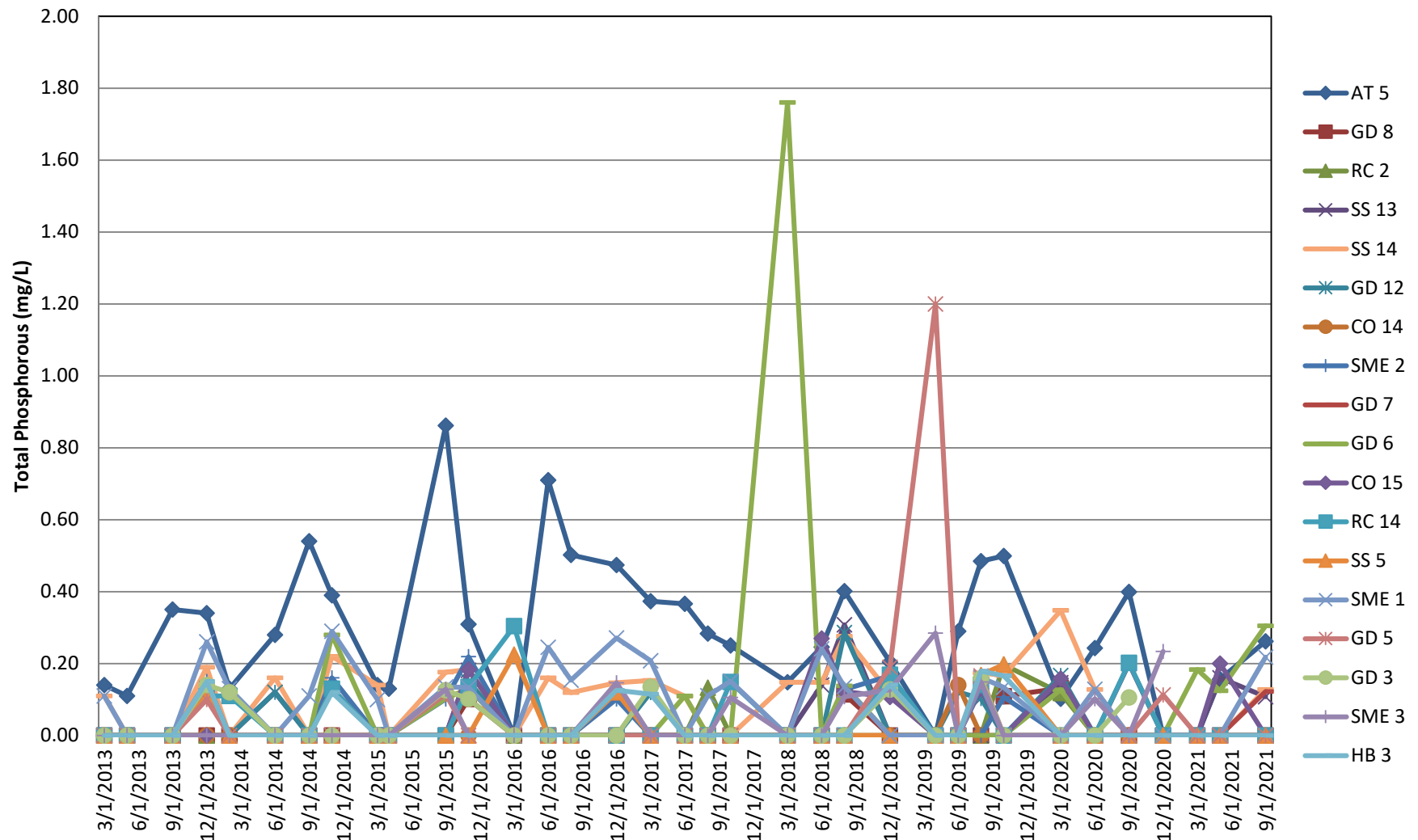
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NPDES PERMIT NO. ALR040009**



**GADSDEN-ETOWAH MS4 MONITORING
NPDES PERMIT NO. ALR040009**



NPDES PERMIT NO. ALR040009



**GADSDEN-ETOWAH MS4 MONITORING
NPDES PERMIT NO. ALR040009**

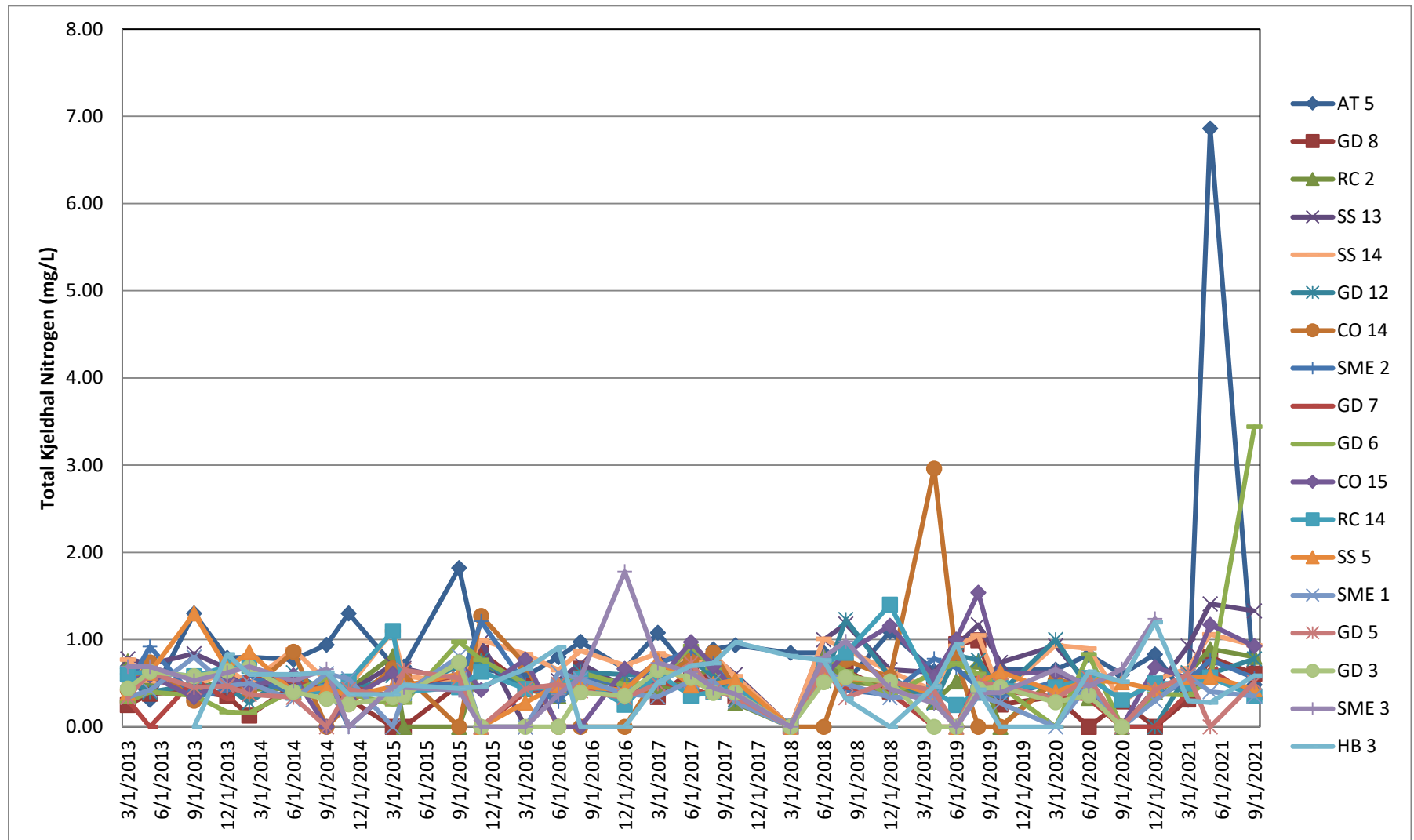
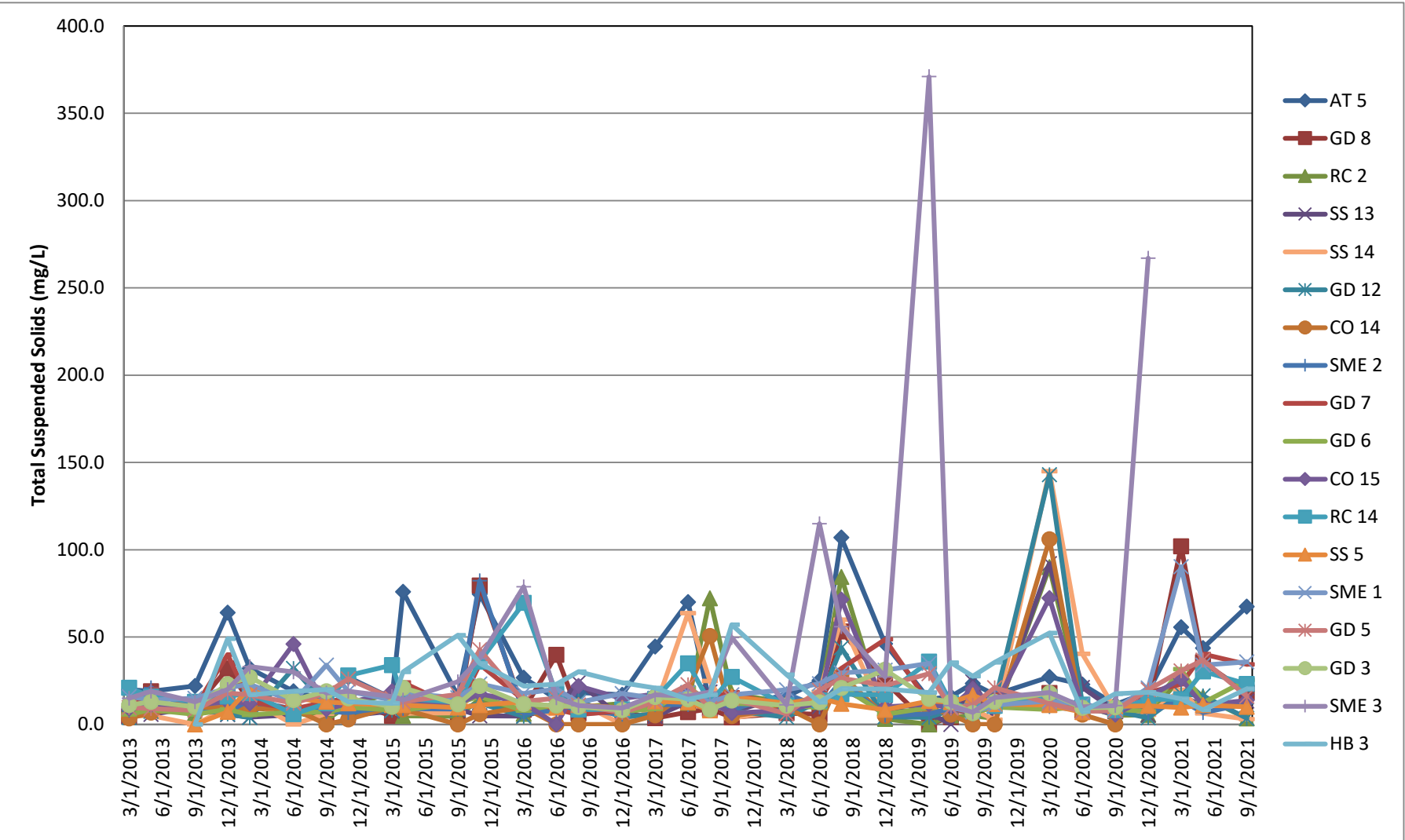


CHART 9 - TOTAL SUSPENDED SOLIDS ANALYTICAL DATA

GADSDEN-ETOWAH MS4 MONITORING

NPDES PERMIT NO. ALR040009



**Supporting documentation is
available upon request.**

**Etowah County Engineering Department
256-549-5358**

Appendix C – Monitoring Reports

**Supporting documentation is
available upon request.**

**Etowah County Engineering Department
256-549-5358**

Appendix D – Public Education and Involvement

ETOWAH COUNTY						
CONTROL MEASURE 1 - PUBLIC EDUCATION AND OUTREACH						
See Section 6.1 of the Annual Report and Section 10.1 of the 2017 SWMPP						
ACTIVITY NO.	STRATEGIES	2021-2022 IMPLEMENTATION STATUS	2022-2023 PROPOSED EFFORTS	SUPPORTING DOCUMENTATION	COMMENTS	PROPOSED CHANGES
1	Storm Water Web Page: Update the Storm Water web page on the Etowah County website	The County maintained information on Storm Water Management on the web page. The 2020-2021 Annual Report was added to the webpage. 111 page views (89 unique) were recorded for the webpage.	The County will maintain the webpage by adding additional information such as articles, pictures, and links.	The Engineering webpage, County Commission website, and the recorded hit information are attached. (See Document 1-1)	http://etowahcounty.org/engineering/storm-water/	NO
2	Annual Report and SWMPP Availability: Provide the SWMPP and current Annual Report for public viewing on the County's website	The current Annual Report and the 2017 SWMPP are available for viewing on the County's website. 111 page views (89 unique) were recorded for the webpage.	The County will provide the 2022 SWMPP and the 2021-2022 Annual Report for public viewing on the County's website. The County will seek public input on the SWMPP and Annual Report by making an announcement at the next Council Meeting after the documents are uploaded.	The Engineering webpage, County Commission website, and the recorded hit information are attached. (See Document 1-1)	http://etowahcounty.org/engineering/storm-water/	YES
3	Partnerships in Educational and Public Involvement Events: Partner with Keep Etowah Beautiful (KEB), Clean Water Partnership of Alabama, and Alabama Power to distribute educational material and promote events	The County participated and/or contributed monetarily in the following events that were held: <i>Great American Cleanup</i> , <i>Message in the Bottle</i> , and the Water Festival. <i>Renew Our Rivers</i> was cancelled due to Covid-19	The County will partner with Keep Etowah Beautiful, Clean Water Partnership of Alabama, and/or Alabama Power to support, sponsor, and/or promote events such as <i>Renew Our Rivers</i> , <i>Message in the Bottle</i> , and/or community cleanup days.	See Activities 3a and 3b The Keep Etowah Beautiful website is also attached. (See Document 1-2)	https://etowahcounty.org/keep-etowah-beautiful/	NO
3a	Partnerships in Educational and Public Involvement Events: Message in the Bottle	<i>Message in the Bottle</i> was held on December 5, 2021. Promoted by Etowah County's funding of Keep Etowah Beautiful. The event is a competition for students with winners being announced at an annual awards breakfast.	The County will partner with Keep Etowah Beautiful, Clean Water Partnership of Alabama, and/or Alabama Power to support, sponsor, and/or promote events such as <i>Renew Our Rivers</i> , <i>Message in the Bottle</i> , and/or community cleanup days.	The 2022 KEB events summary is attached. (See Document 1-3)	990 K-12 Grade Students 54 Teachers	NO
3b	Partnerships in Educational and Public Involvement Events: Renew Our Rivers	Scheduled for October 25 - 29, 2021 Canceled due to Covid-19.	The County will partner with Keep Etowah Beautiful, Clean Water Partnership of Alabama, and/or Alabama Power to support, sponsor, and/or promote events such as <i>Renew Our Rivers</i> , <i>Message in the Bottle</i> , and/or community cleanup days.	<i>Renew our Rivers</i> cancelation email is attached. (See Document 1-4)	Renew Our Rivers was canceled due to Covid-19. 0 total participants for event. 0 tons collected in 2021 event for entire county. 0 Passenger Tires, 0 Tractor Tires, 0 Truck Tires	NO

ETOWAH COUNTY						
CONTROL MEASURE 1 - PUBLIC EDUCATION AND OUTREACH						
See Section 6.1 of the Annual Report and Section 10.1 of the 2017 SWMPP						
ACTIVITY NO.	STRATEGIES	2021-2022 IMPLEMENTATION STATUS	2022-2023 PROPOSED EFFORTS	SUPPORTING DOCUMENTATION	COMMENTS	PROPOSED CHANGES
4	Water Quality Awareness Week: Promote an annual <i>Water Quality Awareness Week</i> through County resources	The county did not promote or participate in a Water Quality Awareness Week during the reporting period. Renew Our Rivers was canceled due to Covid, and the Water Festival was held virtually.	The County will promote a Water Quality Awareness Week during the 2022-2023 monitoring period.	The 2022 KEB events summary is attached. (See Document 1-3)		NO
5	Etowah County Water Festival: Annually promote and participate in an annual <i>Etowah County Water Festival</i>	The 2021-2022 <i>Etowah County Water Festival</i> was held virtually on February 25, 2022 . This is normally held at Gadsden State Community College. Due to Covid-19, information was sent to area schools and were covered in the classroom by teachers.	The County will participate in and promote the 2023 <i>Etowah County Water Festival</i> .	The 2022 KEB events summary is attached. (See Document 1-3)	55 Adult Volunteers 581 4th Grade Teachers 1081 4th Grade Students	NO
6	Great American Clean-up: Partner with Keep Etowah Beautiful	The Great American Cleanup was held from May 1 to May 31, 2021 and had limited cleanups due to Covid.	The County will participate in and promote the 2022 <i>Great American Cleanup</i> .	The 2022 KEB events summary is attached. (See Document 1-3)	Volunteers - 452 Total Tonnage - 7.88	NO
7	Partner with the Etowah County NRCS: Partner with NRCS to educate and assist agricultural land users within the county on how agricultural runoff contributes to organic enrichment and excess nutrient loading in Lake Neely Henry	There were two people referred to the NRCS in 2021. NRCS estimated they distribute 200+ copies of educational materials related to storm water and soil preservation in addition to callers that are directed to the information on their website.	The County will partner with the USDA and/or the NRCS to distribute storm water educational material on the nutrient and pathogen pollution from crop and animal production.	The available information was updated. Flyers, brochures and available materials are attached. (See Documents 1-5a and 1-5b)	NRCS also has educational materials available in their office. The County points citizens to the NRCS for additional information as well as having materials available at the Etowah County Engineering office.	NO
8	Gadsden-Etowah MS4 Steering Committee Meetings: Coordinate and/or participate in meetings as a committee member for entity updates, networking and coordination of activities and BMP strategies	A Steering Committee Meeting was held on April 15, 2021. Two county employees attended	A Steering Committee meeting will be held in the 2022-2023 reporting period.	The attendance record is attached. (See Document 1-6)		NO
9	Educational Materials on Construction Site Storm Water Impacts: Provide the educational pamphlet to individuals requesting building/development permits	0 permit issued during the reporting period. 0 Educational materials provided to permittees	The County will provide educational materials to developers and/or engineers requesting preliminary design reviews for subdivision plats.	The available information was updated. Flyers, brochures and available materials are attached. (See Documents 1-5a and 1-5b)		NO

ETOWAH COUNTY						
CONTROL MEASURE 1 - PUBLIC EDUCATION AND OUTREACH						
See Section 6.1 of the Annual Report and Section 10.1 of the 2017 SWMPP						
ACTIVITY NO.	STRATEGIES	2021-2022 IMPLEMENTATION STATUS	2022-2023 PROPOSED EFFORTS	SUPPORTING DOCUMENTATION	COMMENTS	PROPOSED CHANGES
10	Public Reporting and Tracking System: Provide a contact number on the County's Storm Water Management webpage for the public to provide input on the development, revision, and implementation of the SWMPP	4 inquiries received 4 complaints addressed 4 reports contained required information to find and address the suspected problem	The County will publicize the report form and reporting phone number on the County's website. The County will track received reports and the County's responses to the received reports. The County will evaluate the current public reporting and tracking methods.	The online complaint form, incident tracking sheet, and summary of notable discharge investigations are attached. (See Documents 1-7, 1-8, and 1-9)	https://etowahcounty.org/report-storm-water-issues/	NO
11	No Dumping Signs: Maintain signs and place additional signs in problem areas as necessary	Signs are placed upon request. If signs are ineffective, the litter enforcement agent becomes involved. If the area continues to have litter issues, it is considered for surveillance. The County has two cameras that are rotated to different areas on an as needed basis.	The County will continue to place or maintain these signs in problem areas.	Pictures of the sign and typical placement are attached. (See Document 1-10)	The County maintains approximately 50 signs. The County maintains "No Dumping \$500 fine" signs and these No Dumping areas are under video surveillance signs. These are put out in the County through Keep Etowah Beautiful as part of the effort to eliminate/reduce unauthorized disposal of waste.	NO
12	Additional Strategy: Free Garbage Disposal Days	Advanced Disposal had open-top containers at several locations across the County on May 1, August 7 and November 6, 2021 and February 5, 2022 for residents in unincorporated areas of the County. Event is advertised through public notices and at the Commission Meetings.	The County will continue to provide quarterly free disposal days. The quarterly events will be advertised through public notices and will be announced at County Commission Meetings.	Public notices for each date are attached. (See Document 1-11)		
13	Additional Strategy: Drug Collection Day	The County sponsored Drug Collection Day at the Etowah County Courthouse on October 23, 2021. Advertised the event on local television, radio and print media as well as Facebook, and County bulletin boards.		Countywide email and flyer are attached. (See Document 1-12)		
14	Additional Strategy: Adopt-A-Mile Program	The County provided trash bags for cleanup, maintains the Adopt-A-Mile signs, and disposes of the garbage collected.	The County will continue to support the Adopt-a-Mile program. The County will maintain the Adopt-a-Mile signs along adopted roadways, provide trash bags to groups for Adopt-a-Mile cleanup events, and dispose of the collected litter in a permitted landfill following each event.	PALS program brochure, County Adopt-A-Mile policy as well as other programs of ALPALS are attached. (See Document 1-13)		
15	Additional Strategy: Litter Ordinance - The Sheriff's office enforces the State littering code	The Etowah County Sheriff's Office has an Environmental/Agriculture Unit that investigates dumping and pursues calls to a tip line.	The Sheriff's Office will continue to enforce the State littering code through its programs in 2022.	The Etowah County Sheriff's Office has an Environmental/Agriculture Unit webpage and documentation of dumping and cleanup is attached. (See Document 1-14)	The Littering Code can be viewed at the link below: http://alisondb.legislature.state.al.us/alison/codeofalabama/1975/coatoc.htm	

ETOWAH COUNTY						
CONTROL MEASURE 1 - PUBLIC EDUCATION AND OUTREACH						
See Section 6.1 of the Annual Report and Section 10.1 of the 2017 SWMPP						
ACTIVITY NO.	STRATEGIES	2021-2022 IMPLEMENTATION STATUS	2022-2023 PROPOSED EFFORTS	SUPPORTING DOCUMENTATION	COMMENTS	PROPOSED CHANGES
16	Additional Strategy: Roadway Garbage Pickup	The County utilized County inmates to collect 37.33 tons of trash along the County highways throughout the year.	The Sheriff's Office will continue to enforce the State littering code through its programs in 2022.			
17	Additional Strategy: Continuing Education	Alabama Storm Water Association "Meeting MS4 Permit Requirements, Old & New" Clay Zahorscakh attended the conference on December 2, 2021 . The purpose of this meeting was to share information and network.	County personnel will participate in meetings, seminars, or other events held by the Alabama Stormwater Association (ASA) when possible.	Associated documentation is attached. (See Document 1-15)		

**Supporting documentation is
available upon request.**

**Etowah County Engineering Department
256-549-5358**

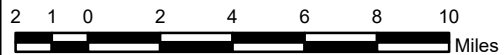
Appendix E - Illicit Discharge Detection and Elimination

ETOWAH COUNTY						
CONTROL MEASURE 2 - ILLICIT DISCHARGE DETECTION AND ELIMINATION						
See Section 6.2 of the Annual Report and Section 10.2 of the 2017 SWMPP						
ACTIVITY NO.	STRATEGIES	2021-2022 IMPLEMENTATION STATUS	2022-2023 PROPOSED EFFORTS	SUPPORTING DOCUMENTATION	COMMENTS	PROPOSED CHANGES
1	Identify Priority Areas: Re-evaluate the drainage basins and determine the Priority Areas for the reporting period	2 drainage basins (Whorton Bend and Tillison Bend) have been identified and IDP Assessments performed on each basin 2 Priority Areas were identified based on population density 0 drainage basins newly listed as a priority area 0 drainage basins de-listed from priority area list	The County will re-evaluate the drainage basins and determine the Priority Areas for the reporting period.	The Storm Water System Map is attached. (See Document 2-1)	Whorton Bend was determined to be the Priority Area based on population density. This area is the peninsula off of Highway 411.	NO
2	Outfall Identification: Implement a stream-walking program to identify outfalls and map a portion of water bodies that receive discharge from the MS4 20% of 35.16 miles of stream inventory is 7.0 miles per reporting period	The County has completed the stream walking for the highly populated areas of the UA (Whorton Bend and Tillison Bend). 48 outfalls were identified The County is still working to determine areas within the UA that are incorrectly shown as stream miles. Some previously identified County areas are now annexed into the Cities, inaccessible due to location, and/or perpetually inundated with water. Determining each location with these situations should reduce the number of stream miles remaining. County employees walked 7 miles of stream. Through field activities, the County is evaluating each area to verify its inclusion as walkable stream.	The County plans to work with S&ME update the UA map to show annexed areas and indicate which areas are inaccessible during the next reporting period. The County will determine the number of stream miles remaining and will identify outfalls through the stream walking program and map water bodies. The SWMPP will be updated during the next reporting period with the obtained information.	The updated outfall inventory and MS4 map are attached. (See Documents 2-1 and 2-2)	Field observations are maintained at the Etowah County Engineering office.	YES
3	Probable Outfall Verification: Add probable outfalls to the GIS database and label as unverified. Verify outfalls within 18 months	0 probable outfalls identified 0 outfalls verified	Outfalls identified during review of the as-built drawings or from final inspections will be added to the outfall inventory and map as "Potential Outfalls" and will be inspected during the scheduled ORI activities.		Field observations are maintained at the Etowah County Engineering office.	YES
4	Outfall Reconnaissance Inventory: Conduct dry weather monitoring of 20% of major outfalls in Priority Areas	The County inspected 16 of the 31 identified major outfalls in Priority Areas. This is 51.6% of the major outfalls.	Outfalls in Priority Areas will be inspected once every three years, regardless of major or minor classification.	The list of outfalls inspected during the reporting period and copies of the ORI field sheets are attached. (See Document 2-3)	Field observations are maintained at the Etowah County Engineering office.	YES
4a	Outfall Reconnaissance Inventory: Conduct dry weather monitoring of 15% of all known outfalls	The County inspected 16 of the 48 known outfalls. This is 33.3% of the known outfalls.	The County will conduct dry weather inspection and screening of at least 15% of all known outfalls. All known outfalls will be inspected at least once during the 5-year permit cycle.	The list of outfalls inspected during the reporting period and copies of the ORI field sheets are attached. (See Document 2-3)	Field observations are maintained at the Etowah County Engineering office.	NO

ETOWAH COUNTY						
CONTROL MEASURE 2 - ILLICIT DISCHARGE DETECTION AND ELIMINATION						
See Section 6.2 of the Annual Report and Section 10.2 of the 2017 SWMPP						
ACTIVITY NO.	STRATEGIES	2021-2022 IMPLEMENTATION STATUS	2022-2023 PROPOSED EFFORTS	SUPPORTING DOCUMENTATION	COMMENTS	PROPOSED CHANGES
5	Suspect Discharge Sampling: Field crews will collect samples of suspected illicit discharges for laboratory analysis	3 identified dry weather flows 0 suspect discharges 0 samples collected 0 confirmed illicit discharges	Field crews will collect samples of suspected illicit discharges for laboratory analysis.	Completed ORI forms for locations with flow are attached. (See Document 2-3)	Field observations are maintained at the Etowah County Engineering office.	NO
6	Outfall Ranking: Designate the inspected outfalls as having obvious, suspect, possible, or unlikely discharge potential based on data from each ORI Field Sheet	16 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.	A table with each inspected outfall ranking is attached. (See Document 2-3)		NO
7	Discharge Investigation: Illicit discharge investigations will be performed to determine the source of a discharge problem	0 illicit discharge investigations 0 confirmed illicit discharges 0 sources determined 0 discharges eliminated	Where illicit discharges are identified, the County will conduct an illicit discharge investigation to determine the source.	The illicit discharge log is attached. (See Document 2-4)	No illicit discharges identified during this reporting period.	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.	The illicit discharge log is attached. (See Document 2-4)	No illicit discharges identified during this reporting period.	NO
9	Update Storm Water System Map - Existing Features: Update the existing GIS map as storm drain features are identified	No new information or features were added to the Storm Water System Map.	The existing storm water system map will be updated as features are identified.	The Storm Water System Map is attached. (See Document 2-1)		NO
10	Update Storm Water System Map - Future Additions: Proposed additions to the County MS4, including new storm sewer and drainage ditches, will be mapped based on the civil plans provided to the County	0 civil plans provided to the County 0 verified new features or outfalls No new information was added to the Storm Water System Map	Proposed and new additions will be mapped based on civil plans provided to the County.	The Storm Water System Map is attached. (See Document 2-1)		NO
11	Evaluate IDDE Ordinance: Etowah County currently does not have the authority to enact an illicit discharge ordinance, and would require action from the Alabama Legislature to gain that ability	0 complaints received 0 illicit discharges identified 0 resolved violations 0 repeat offenders 0 enforcement actions taken	The County will evaluate the potential for an Ordinance annually.	The illicit discharge log is attached. (See Document 2-4)	In Etowah County, Home Rule is limited by the State constitution. Counties have no general grant of power in the State Constitution and must go to the Alabama Legislature for authority to engage in any activity not currently authorized by the State Constitution. Authority may be granted through constitutional amendments or by an act of the legislature known as "local legislation." Etowah County currently does not have the authority to enact an illicit discharge ordinance, and would require action from the Alabama Legislature to gain that authority.	NO

ETOWAH COUNTY						
CONTROL MEASURE 2 - ILLICIT DISCHARGE DETECTION AND ELIMINATION						
See Section 6.2 of the Annual Report and Section 10.2 of the 2017 SWMPP						
ACTIVITY NO.	STRATEGIES	2021-2022 IMPLEMENTATION STATUS	2022-2023 PROPOSED EFFORTS	SUPPORTING DOCUMENTATION	COMMENTS	PROPOSED CHANGES
12	Distribute Storm Water Educational Material: Distribute educational materials to public highlighting identification and reporting of potential illicit discharges	The County has educational materials available at the Etowah County Engineering Office.	The County will provide educational materials to the public via the webpage and/or materials in County buildings.	The available information was updated. Flyers, brochures and available materials are attached. (See Documents 1-5a and 1-5b)		NO
12a	Distribute Storm Water Educational Material: The County will provide educational materials highlighting identification and reporting of potential illicit discharges on the County's storm water webpage	111 page views (89 unique) were recorded for the webpage.	The County will provide educational materials to the public via the webpage and/or materials in County buildings.	The Engineering webpage, County Commission website, and the recorded hit information are attached. (See Document 1-1)		NO
13	Public Reporting and Tracking: Evaluate the reporting and tracking system for illicit discharges (including spills or illegal dumping), impaired waterways, and violations of ordinances relating to storm water pollution	4 inquiries received 4 complaints addressed 4 reports contained required information to find and address the suspected problem	The County will publicize the report form and reporting phone number on the County's website. The County will track received reports and the County's responses to the received reports. The County will evaluate the current public reporting and tracking methods.	The online complaint form, incident tracking sheet, and summary of notable discharge investigations are attached. (See Documents 1-7, 1-8, and 1-9)	https://etowahcounty.org/report-storm-water-issues/	NO
14	Municipal Training: Train County personnel on the identification of illicit discharges and procedures for reporting illicit discharges within the County organization	In-person training was canceled due to Covid concerns. S&ME developed an Annual Training handout during the 2020-2021 reporting period. The 2021 handout was provided to County employees again on March 14-17, 2022. 42 County employees attended training.	The County will train personnel on the identification of illicit discharges and procedures for reporting illicit discharges within the County organization.	A copy of the provided training is attached. (See Document 2-5)	The County plans to resume in-person training during the 2022-2023 reporting period, covid permitting.	NO
15	Storm Water Monitoring Locations: Update existing GIS map with storm water monitoring locations	SME 2 and SME 8 were removed from the monitoring program. SME 9 and SME 10 were added.	Where necessary, the monitoring locations will be updated in the GIS map with revised coordinates.	The updated Storm Water Monitoring Points Map is attached. (See Document 2-6)		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 monitoring data has been provided in the 2021-2022 Annual Report	Monitoring data will be evaluated following the 2022-2023 reporting period.	See summary of monitoring reports in Annual Report.		NO
17	NPDES Industrial Permitting: Evaluate permitted and unpermitted facilities in the County 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.		Etowah County continues to rely on ADEM for NPDES permitting enforcement	NO

N



Annual Storm Water Monitoring

Stormwater

Type

Monitoring

Possibility_Out_Fall

Rainfall

Legend

- ✓ GardenesAllIA
- Albinoe_CityLimits
- Atalia_CityLimits
- Besse_CityLimits
- Clawson_CityLimits
- HolmesBnd_CityLimits
- Mountainsburg_CityLimits
- RainbowCity_CityLimits
- PeaceCity_CityLimits
- Religietite_CityLimits
- Sarda_CityLimits
- Southeast_CityLimits
- WalmartCity_CityLimits
- Gardenes_CityLimits
- GardenesAllIA_in_County

3/30/22

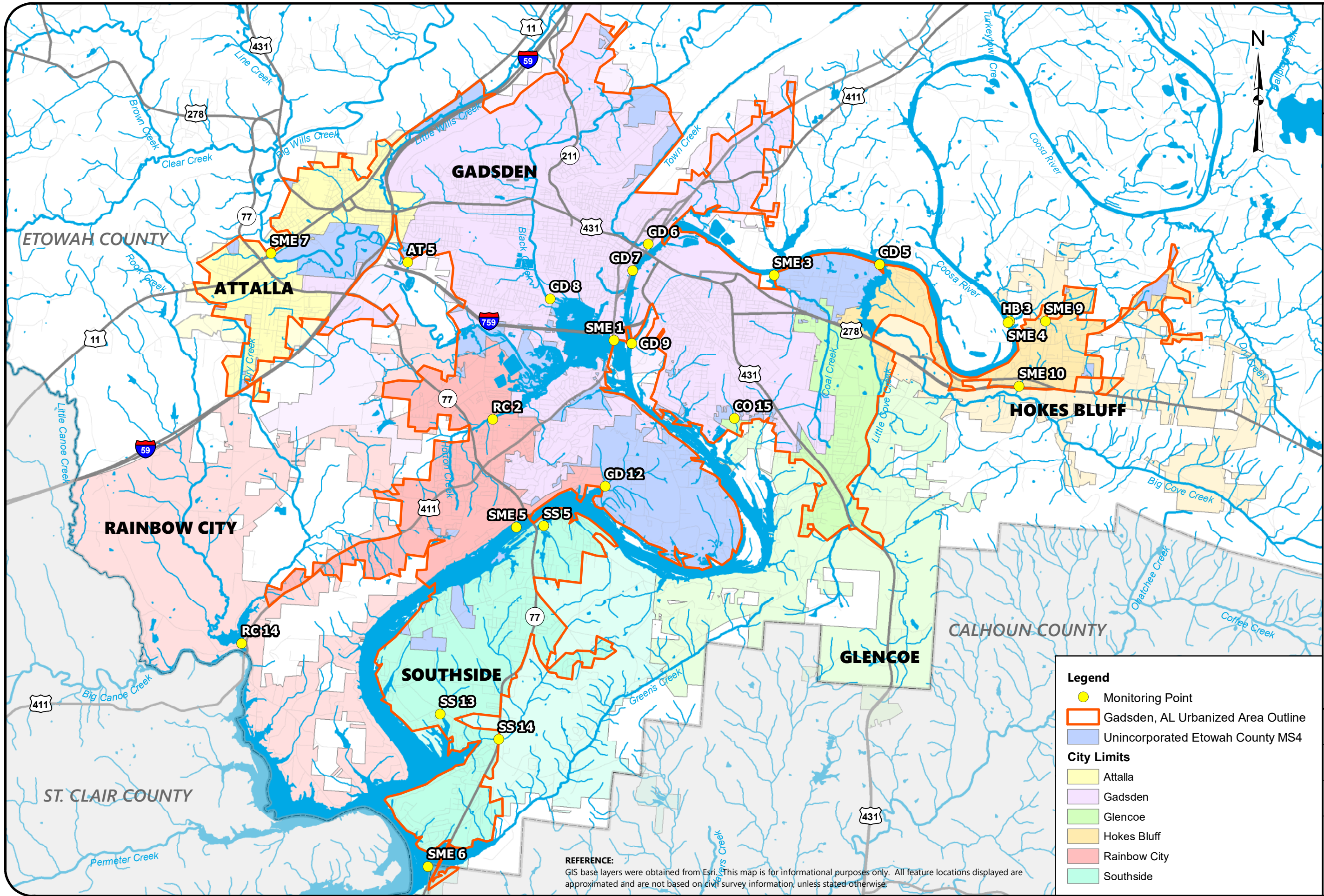
OUTFALL INVENTORY TABLE

TYPE	LOCATION	OUTFALL ID	LATITUDE	LONGITUDE	ACCESS
Rainfall	Rainbow_City_AL	KALRAINB7	33.922	-86.099	Land
Rainfall	Gadsden Municipal Airport	KGAD	33.973	-86.088	Land
Rainfall	Noccalula_Falls	KALGADSD3	34.056	-85.994	Land
Rainfall	Hokes Bluff_AL	KALHOKES2	33.993	-85.806	Land
Monitoring	Big Wills Creek	AT 5	34.006446	-86.069061	Land
Monitoring	Black Creek	GD_8	33.999535	-86.024463	Land
Monitoring	Horton Creek	RC_2	33.967683	-86.039476	Land
Monitoring	Neely Henry_Lake	SS_13	33.891352	-86.049229	Land
Monitoring	U.T._to_Neely Henry Lake	SS 14	33.885921	-86.030683	Land
Monitoring	U.T._to_Neely Henry Lake	GD_12	33.952567	-86.003495	Land
Monitoring	U.T._to_Neely Henry_Lake	CO_14	33.940904	-85.967704	Land
Monitoring	U.T._to_Coosa_River	SME 2	34.002461	-86.001571	Land
Monitoring	Storm Sewer Outfall_Coosa	GD_7	34.008361	-85.999777	Boat
Monitoring	Town_Creek	GD_6	34.01535	-85.995617	Land
Monitoring	U.T._to_Neely Henry Lake	CO_15	33.97228	-85.965354	Land
Monitoring	Rock Creek/Dry_Creek/Coosa	RC 14	33.905786	-86.111656	Boat
Monitoring	U.T._to_Coosa_River	SS_5	33.941329	-86.021569	Boat
Monitoring	Big Wills Crek/Black_Creek	SME_1	33.990184	-86.004048	Boat
Monitoring	Cove_Creek	GD_5	34.014324	-85.924013	Boat
Monitoring	U.T._to_Neely Henry_Lake	GD_3	34.01238	-85.953651	Boat
Monitoring	Coal Creek	SME_3	34.009698	-85.95623	Boat
Monitoring	U.T._to_Neely Henry_Lake	HB_3	34.002129	-85.882808	Boat
Pos Out_FL	Green_Leaf_Road	ECO_1	34.00685	-85.948693	Land
Pos Out FL	Burger_Circle_1	ECO_2	34.007804	-85.947988	Land
Pos Out FL	Burger Circle_2	ECO 3	34.008225	-85.947277	Land
Pos Out FL	Meadowlark Place	ECO 4	34.008547	-85.94576	Land
Pos Out FL	Robert_Lee_Road	ECO 5	34.011229	-85.942422	Land
Pos Out FL	Lonz Road	ECO_6	34.010724	-85.93638	Land
Pos Out FL	McCluney_St_&_Mimosa_St	ECO_7	34.003013	-85.942328	Land
Pos Out FL	Centre Road	ECO 48	34.014913	-85.839036	Land
Pos Out FL	Day Circle_1	ECO_8	34.022324	-85.83502	Land
Pos Out FL	Day Circle_2	ECO_9	34.023231	-85.833318	Land
Pos Out FL	Lay_Springs Road_1	ECO 10	34.052228	-86.002485	Land
Pos Out FL	Lay Springs Road_2	ECO_11	34.050849	-86.005427	Land
Pos Out FL	Delmont Drive@Black Creek	ECO 12	34.053495	-86.004431	Land
Pos Out FL	Fairview Road	ECO 13	34.067154	-86.01146	Land
Pos Out FL	Morgan Drive_Northwest	ECO_14	34.025493	-86.10732	Land
Pos Out FL	Pine View Circle	ECO_15	33.970462	-86.109709	Land
Pos Out FL	Township Road	ECO_16	33.937567	-86.055204	Land
Pos Out FL	Sutton Bridge_Rd@Big Will	ECO_17	33.990894	-86.045406	Land
Pos Out FL	Sutton_Bridge RD_2	ECO_18	33.985223	-86.044002	Land
Pos Out FL	Steele Station RD	ECO_19	33.978874	-86.050866	Land
Pos Out FL	Whorton_Bend_RD_1	ECO_20	33.977681	-86.007028	Land
Pos Out FL	Whorton_Bend_RD_2	ECO_21	33.961145	-85.985072	Land
Pos Out FL	Pine_Haven_Road_1	ECO_22	33.957385	-85.989847	Land
Pos Out FL	Pine_Haven_Road_2	ECO_24	33.957286	-85.993604	Land
Pos Out FL	Richard Road	ECO_25	33.956505	-85.995781	Land

Pos Out FL	Pine_Haven_Road_3	ECO_26	33.957294	-85.99696	Land
Pos Out FL	Pine_Haven_Road_4	ECO_27	33.957317	-85.99813	Land
Pos Out FL	Cherokee Road	ECO_28	33.956127	-86.000088	Land
Pos Out FL	Garmon_Road_1	ECO_29	33.961028	-85.994342	Land
Pos Out FL	Garmon_Road_2	ECO_30	33.960485	-85.998639	Land
Pos Out FL	Garmon_Road_3	ECO_31	33.953754	-86.003692	Land
Pos Out FL	Whorton_Bend_Road_3	ECO_32	33.952565	-86.003479	Land
Pos Out FL	Whorton_Bend_Road_4	ECO_33	33.951737	-86.001405	Land
Pos Out FL	Heron Drive_NW	ECO_34	33.9435	-85.994128	Land
Pos Out FL	Lakeshore_Drive	ECO_35	33.94089	-85.967656	Land
Pos Out FL	Clokey Drive	ECO_36	33.954425	-85.969839	Land
Pos Out FL	Beech Ridge Road	ECO_38	33.959115	-85.980312	Land
Pos Out FL	Cross Creek Lane	ECO_39	33.958153	-85.981076	Land
Pos Out FL	River Ridge_Road_2	ECO_40	33.959924	-85.976839	Land
Pos Out FL	River_Ridge Road_1	ECO_37	33.958435	-85.976669	Land
Pos Out FL	River Ridge_Road_3	ECO_41	33.9602	-85.978686	Land
Pos Out FL	Oakland_Drive 1	ECO_23	33.956893	-85.991416	Land
Pos Out FL	Oakland_Drive_2	ECO_42	33.950314	-85.991278	Land
Pos Out FL	Chrislyn Drive	ECO_43	33.952385	-85.997343	Land
Pos Out FL	College Parkway_1	ECO_44	33.971805	-85.971048	Land
Pos Out FL	College Parkway_2	ECO_45	33.971852	-85.969514	Land
Pos Out FL	College Parkway_3	ECO_46	33.971904	-85.965338	Land
Pos Out FL	College Parkway_4	ECO_47	33.972949	-85.954938	Land

MS4 STORM WATER OUTFALL MONITORING 2021 - 2022 INSPECTION LOG

ID	LOCATION	BASIN	DATE OF INSPECTION	ILLICIT DISCHARGE	FLOW (Y/N)
ECO_1	GREEN LEAF ROAD	TILLISON BEND	8/25/2021	UNLIKELY	N
ECO_2	BURGER CIRCLE 1	TILLISON BEND	8/25/2021	UNLIKELY	N
ECO_3	BURGER CIRCLE 2	TILLISON BEND	8/25/2021	UNLIKELY	N
ECO_4	MEADOWLARK PLACE	TILLISON BEND	8/25/2021	UNLIKELY	N
ECO_5	ROBERT LEE ROAD	TILLISON BEND	8/25/2021	UNLIKELY	N
ECO_6	LONZ ROAD	TILLISON BEND	8/25/2021	UNLIKELY	N
ECO_7	MCCLUNEY STREET @ MIMOSA STREET	TILLISON BEND	8/25/2021	UNLIKELY	Y
ECO_22	PINE HAVEN ROAD 1	WHORTON BEND	8/26/2021	UNLIKELY	Y
ECO_23	OAKLAND DRIVE 1	WHORTON BEND	8/26/2021	UNLIKELY	Y
ECO_24	PINE HAVEN ROAD 2	WHORTON BEND	8/26/2021	UNLIKELY	N
ECO_25	RICHARD ROAD	WHORTON BEND	8/26/2021	UNLIKELY	N
ECO_26	PINE HAVEN ROAD 3	WHORTON BEND	8/26/2021	UNLIKELY	N
ECO_27	PINE HAVEN ROAD 4	WHORTON BEND	8/26/2021	UNLIKELY	N
ECO_28	CHEROKEE ROAD	WHORTON BEND	8/26/2021	UNLIKELY	N
ECO_29	GARMON ROAD 1	WHORTON BEND	8/26/2021	UNLIKELY	N
ECO_30	GARMON ROAD 2	WHORTON BEND	8/26/2021	UNLIKELY	N



WET-WEATHER MONITORING LOCATIONS

GADSDEN ALABAMA URBANIZED AREA
PHASE II SMALL MUNICIPAL SEPARATE STORM SEWER SYSTEM
NPDES GENERAL PERMIT ALR040009

SCALE:
1:100,000

DATE:
03/23/2022

PROJECT NUMBER
215660

FIGURE NO.
2

**Supporting documentation is
available upon request.**

**Etowah County Engineering Department
256-549-5358**

Appendix F – Construction Site Storm Water Runoff

ETOWAH COUNTY						
CONTROL MEASURE 3 - CONSTRUCTION SITE STORM WATER RUNOFF						
See Section 6.3 of the Annual Report and Section 10.3 of the 2017 SWMPP						
ACTIVITY NO.	STRATEGIES	2021-2022 IMPLEMENTATION STATUS	2022-2023 PROPOSED EFFORTS	SUPPORTING DOCUMENTATION	COMMENTS	PROPOSED CHANGES
1	Erosion and Sediment Control Ordinance: County's Subdivision Regulations, Article V, Section 5-4-4 (Road Construction Requirements) regulates storm water management within the County Evaluate the effectiveness of the Regulations each reporting period	The County evaluated the Subdivision Regulations on their effectiveness in addressing erosion and sediment control. No changes were deemed necessary.	The Subdivision Regulations will be evaluated annually on their effectiveness in addressing erosion and sediment control. The County will report if changes are made to the Subdivision Regulations during the reporting period.	Subdivision Regulations are attached. (See Document 3-1)	The County does not currently have authority over construction activities beyond the initial infrastructure, nor does the County have the authority to regulate private developments such as commercial sites, individual home sites, or private subdivisions.	NO
2	Construction Site Inspection Program: Conduct regular inspections of construction sites within the County Evaluate the effectiveness of the inspection program.	The County evaluated the effectiveness of the construction site inspection program and no changes were deemed necessary	The County will implement the Construction Site Inspection Program as detailed in the 2022 SWMPP.	There were no active construction sites within the County MS4 during the reporting period.	0 inspections completed 0 non-compliant construction sites 0 enforcement actions 0 sites needed to be reported to ADEM to obtain compliance 0 repeat offenders	NO
2a	Sediment and Erosion Control Plan Review: Review Sediment and Erosion Control Plans and Storm Water Management Plans for all new construction Evaluate the effectiveness of the plan review program	The County evaluated the Program on its effectiveness and no changes were deemed necessary.	The County will not review submitted plats for erosion and sediment control measures and will instead rely on the designated Qualified Credentialed Professionals preparing the Construction Best Management Practices Plans. Sediment and erosion control measures certified by a Qualified Credentialed Professional as defined in the Alabama Construction General Permit will be deemed adequate and will not be reviewed by County personnel.	There were no new developments within the County MS4 during the reporting period.	0 plans reviewed 0 plans approved 0 plans rejected 0 sites subject to ALR100000 0 plans met ADEM requirements	YES
3	BMP Training Program: Conduct annual CBMP training for County inspectors and reviewers	Refresher QCI training was held virtually on April 20, 2021. Robert Nail QCP, #53963 Mel Smith QCI, #39562 Tyson Burwell QCI #31730 William Vaughn QCI #T2437	Refresher trainings will be completed.	Updated ALDOT QCI certificates are attached. (See Document 3-2)		NO
4	Public Reporting and Tracking: Evaluate the reporting and tracking methods for non-compliant construction sites, illicit discharges, impaired waterways, and violations of ordinances relating to storm water pollution, as well as, comments concerning the SWMPP.	4 inquiries received 4 complaints addressed 4 reports contained required information to find and address the suspected problem	The County will publicize the report form and reporting phone number on the County's website. The County will track received reports and the County's responses to the received reports. The County will evaluate the current public reporting and tracking methods.	The online complaint form, incident tracking sheet, and summary of notable discharge investigations are attached. (See Documents 1-7, 1-8, and 1-9)	https://etowahcounty.org/report-storm-water-issues/	NO

ETOWAH COUNTY						
CONTROL MEASURE 3 - CONSTRUCTION SITE STORM WATER RUNOFF						
See Section 6.3 of the Annual Report and Section 10.3 of the 2017 SWMPP						
ACTIVITY NO.	STRATEGIES	2021-2022 IMPLEMENTATION STATUS	2022-2023 PROPOSED EFFORTS	SUPPORTING DOCUMENTATION	COMMENTS	PROPOSED CHANGES
5	Notify ADEM of Non-Compliant Sites: The County will notify ADEM of any construction sites where a possible violation of the Clean Water Act has occurred	0 construction sites were reported to ADEM to obtain compliance	The County will rely on ADEM for construction NPDES enforcement.		Non-compliant sites will be reported to the Construction Section of the Storm water Management Division of ADEM in Birmingham, Alabama by phone and/or email.	NO

**Supporting documentation is
available upon request.**

**Etowah County Engineering Department
256-549-5358**

Appendix G – Post-Construction Storm Water Management

ETOWAH COUNTY						
CONTROL MEASURE 4 - POST-CONSTRUCTION STORM WATER MANAGEMENT						
See Section 6.4 of the Annual Report and Section 10.4 of the 2017 SWMPP						
ACTIVITY NO.	STRATEGIES	2021-2022 IMPLEMENTATION STATUS	2022-2023 PROPOSED EFFORTS	SUPPORTING DOCUMENTATION	COMMENTS	PROPOSED CHANGES
1	<p>Reducing Post-Construction Runoff Volume: Article IV Section 4.2 (Construction Plan Requirements) of the Etowah County Subdivision Regulations requires submittal of a Storm Drainage Plan with submittal of a Major Subdivision Plat. Sections 4-2(2)e-h require details of pre- and post-construction runoff, drainage structures, and compatibility with existing drainage to be provided with each submitted plan.</p> <p>Etowah County Subdivision Regulations 5-1(4) Page 24 and 5-4-4 Page 30 requires developers to meet the rules and standards of ADEM and other appropriate State and Federal agencies.</p> <p>Evaluate the effectiveness of the Subdivision Regulations each reporting period</p>	<p>The County evaluated the Subdivision Regulations on their effectiveness in reducing runoff from new development or redevelopment and no changes were deemed necessary.</p>	<p>The County will evaluate the Subdivision Regulations annually.</p>	<p>Subdivision Regulations are attached. (See Document 3-1)</p>	<p>The County's Subdivision Regulations are limited to construction activities within future County right-of-way for roadways (e.g., roads, storm sewers, etc.).</p> <p>The County does not currently have authority over construction activities beyond the initial infrastructure, nor does the County have the authority to regulate private developments such as commercial sites, individual home sites, or private subdivisions.</p>	NO
2	<p>Reducing Pollutants from Development: Etowah County Subdivision Regulations 5-4-4(11) Page 33 specify storm drainage runoff requirements for developers</p> <p>Evaluate the effectiveness of the Subdivision Regulations each reporting period</p>	<p>The County evaluated the Subdivision Regulations on their effectiveness in reducing runoff from new development or redevelopment and no changes were deemed necessary.</p>	<p>The County will evaluate the Subdivision Regulations annually.</p>	<p>Subdivision Regulations are attached. (See Document 3-1)</p>	<p>0 developments required treatment of storm water runoff.</p>	NO
3	<p>Long-Term Maintenance for Storm Water Controls: Etowah County Subdivision Regulations 5-4-4(11) Page 33 states, "Parcels of land containing either a flood retention pond or sedimentation pond shall be retained by the developer or home owner's association with the maintenance of said ponds to be the responsibility to remain with either the developer or home owner's association."</p> <p>Evaluate the effectiveness of the Subdivision Regulations each reporting period</p>	<p>The County evaluated the Subdivision Regulations on their effectiveness in reducing runoff from new development or redevelopment and no changes were deemed necessary.</p>	<p>The County will evaluate the Subdivision Regulations annually.</p>	<p>Subdivision Regulations are attached. (See Document 3-1)</p>	<p>0 submitted plans included detailed maintenance procedures 0 maintenance agreements reviewed 0 maintenance provisions approved 0 maintenance provisions denied 0 enforcement actions taken</p>	NO

ETOWAH COUNTY						
CONTROL MEASURE 4 - POST-CONSTRUCTION STORM WATER MANAGEMENT						
See Section 6.4 of the Annual Report and Section 10.4 of the 2017 SWMPP						
ACTIVITY NO.	STRATEGIES	2021-2022 IMPLEMENTATION STATUS	2022-2023 PROPOSED EFFORTS	SUPPORTING DOCUMENTATION	COMMENTS	PROPOSED CHANGES
4	Evaluate Obstacles to Low Impact/Green Development: Review and evaluate policies and ordinances to identify regulatory and policy impediments to the installation of green infrastructure and low-impact development techniques	0 obstacles identified The County utilizes open ditching to allow green infrastructure.	The County will review and evaluate policies and ordinances to identify regulatory and policy impediments to the installation of green infrastructure and low-impact development techniques. The County utilizes open ditching to allow green infrastructure.	The job cost report for ditching activities is attached. (See Document 4-1)		NO
5	Post-Construction Control Plan Review: Review Sediment and Erosion Control Plans for all new construction for review of post-construction controls Evaluate the effectiveness of the plan review program	There were no new developments for the reporting period.	The Engineering Department will review Proposed Plat Application Assemblies to ensure compliance with the subdivision regulations. The plats will be reviewed for compliance with the design criteria established in the Subdivision Regulations. Major subdivisions will be reviewed within 30 days of submittal of the complete application.		0 plans reviewed 0 plans approved 0 plans rejected 0 post-construction designs approved 0 post-construction designs rejected	NO
6	Post-Construction Inspection Program: Inspect post-construction controls after stabilization is complete to confirm post-construction storm water measures/structures have been installed according to the submitted plan Annually inspect each site to confirm post-construction BMPs are functioning as designed Evaluate the effectiveness of the inspection program	No new post-construction storm water controls were installed during the reporting period. The County updated the Post-Construction Controls Inspection Form. 0 post-construction structural controls are located within the UA	The County will inspect County-owned or managed post-construction BMPs within the Etowah County MS4 at a minimum of once per year. The County does not currently have authority to inspect post-construction controls located on private property.	The updated inspection form is attached. (See Document 4-2)	0 inspections completed 0 projects completed per submitted plans 0 projects not constructed in accordance to submitted plans	NO
7	Post-Construction Structural Controls Inventory: Update an inventory of post-construction structural controls including those owned by the County	0 post-construction structural controls are located within the UA	The County will update an inventory of post-construction structural controls, including those owned by the County.			NO
8	Additional Strategy: Highway Erosion Control	Etowah County worked to reduce runoff within our right-of way and monitor our areas for erosion. The County utilized riprap in areas resistant to permanent vegetation.		Erosion Control report with dates, materials, and hours is attached (See Document 4-1)	The County will continue to use riprap and grassing as erosion countermeasures when applicable.	

**Supporting documentation is
available upon request.**

**Etowah County Engineering Department
256-549-5358**

ETOWAH COUNTY DEVELOPMENT POST-CONSTRUCTION BMP INSPECTION FORM

INSPECTOR _____

SIGNATURE _____

OWNER NAME _____

OWNER ADDRESS _____

OWNER PHONE _____

OWNER EMAIL _____

ARE BMPS WORKING PROPERLY?

ARE ADDITIONAL BMPS NEEDED? _____

HAVE ALL PREVIOUS ISSUES BEEN ADDRESSED AND CORRECTED?

[illegible]

Appendix H – Pollution Prevention for Municipal Operations

ETOWAH COUNTY						
CONTROL MEASURE 5 - POLLUTION PREVENTION AND GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS						
See Section 6.5 of the Annual Report and Section 10.5 of the 2017 SWMPP						
ACTIVITY NO.	STRATEGIES	2021-2022 IMPLEMENTATION STATUS	2022-2023 PROPOSED EFFORTS	SUPPORTING DOCUMENTATION	COMMENTS	PROPOSED CHANGES
1	County Facilities: Maintain a list of County facilities that have the potential to discharge pollutants through storm water runoff Update SOPs for facilities as needed and inspect facilities monthly	3 County facilities 2 facilities with pollution potential	The County will continue to maintain the inventory listing all County facilities, including County facilities that have the potential to discharge pollutants via storm water runoff.	A list of County facilities and addresses is attached. (See Document 5-1)		YES
1a	County Facilities: Inspect each facility for good housekeeping practices on a quarterly basis.	4 inspections were performed at each facility 0 housekeeping deficiencies related to storm water were identified	County facilities that have been determined to have the potential to discharge pollutants via storm water runoff will be inspected for good housekeeping practices once per quarter.	Example inspection reports are attached. (See Document 5-2)		NO
1b	County Facilities: SOPs were established for each facility	Updates were not necessary	The County will develop SOPs for vehicle washing and vehicle fueling operations by March 31, 2023.	Established SOPs are attached. (See Document 5-3)		YES
2	Employee Training: Implement a BMP training program for County personnel each reporting period	In-person training was canceled due to Covid concerns. S&ME developed an Annual Training handout during the 2020-2021 reporting period. The 2021 handout was provided to County employees again on March 14-17, 2022. 42 County employees attended training.	The County will train personnel on good housekeeping for County operations.	A copy of the provided training is attached. (See Document 2-5)	The County plans to resume in-person training during the 2022-2023 reporting period, covid permitting.	NO
3	Vehicle Maintenance Program: Conduct routine inspections of municipal vehicles and equipment	Daily inspections were performed on vehicles before they were driven. 6 vehicle or equipment leaks identified and corrected during the reporting period	The County will conduct operations in accordance with the written SOP. The SOP will be reviewed annually and updated if needed.	Work orders for the identified leaks are attached. (See Document 5-4)		NO
4	Vehicle Wash Area: Specify areas for vehicle washing. Each Department location will be reviewed, inspected, and modified as needed throughout the year	1 designated municipal vehicle washing area 4 inspections performed (quarterly) 0 deficiencies noted	The County will develop a written Standard Operating Procedure for vehicle washing operations by March 31, 2023.	Example inspection checklists and a photo of the designated wash area are attached. (See Documents 5-2 and 5-5)		YES
5	Herbicide Applications: Ensure herbicide applicators have current certifications	The County used various herbicides to control unwanted vegetation. Steve Talton Permit #2004281 Exp. 4-28-2023. Samuel Woodward Permit # 2002374 Exp. 3-28-2022 Thomas Guthery Permit #2004411 Exp. 5-28-2023. Jerry Holland Permit #2005468 Exp. 3-28-2025.	The County will maintain all necessary certifications and licensing for personnel tasked with herbicide application.	Certifications and herbicide report with dates, materials, and hours are attached. (See Documents 5-6 and 5-7)		NO

ETOWAH COUNTY						
CONTROL MEASURE 5 - POLLUTION PREVENTION AND GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS						
See Section 6.5 of the Annual Report and Section 10.5 of the 2017 SWMP						
ACTIVITY NO.	STRATEGIES	2021-2022 IMPLEMENTATION STATUS	2022-2023 PROPOSED EFFORTS	SUPPORTING DOCUMENTATION	COMMENTS	PROPOSED CHANGES
6	Litter Ordinance: The Sheriff's office enforces the State littering code	The Etowah County Sheriff's Office has an Environmental/Agriculture Unit that investigates dumping and pursues calls to a tip line.	The Sheriff's Office will continue to enforce the State littering code through its programs in 2022.	The Etowah County Sheriff's Office has an Environmental/Agriculture Unit webpage and documentation of dumping and cleanup is attached. (See Document 1-14)	The Littering Code can be viewed at the link below: http://alisondb.legislature.state.al.us/alison/codeofalabama/1975/coatoc.htm	YES
7	Litter, Floatables, and Debris - Oil Waste Recycling: Manage a program at the County Shop to recycle used oil and filters	0 gallons of used oil was recycled in Fleet Maintenance. Oil has been collected and stored onsite but not yet been collected. Oil Filters were collected as usual.		Photos of collection areas and invoices attached.. (See Document 5-8)	The County collects used oil and filters at the Maintenance Shop.	YES
8	Litter, Floatables, and Debris - Recycling Program: Manage a recycling program for aluminum cans and scrap metal	22.4 tons collected at Etowah County's Gadsden shop		Photos of collection areas and invoices attached. (See Document 5-8)	The County recycles aluminum cans in the break room at the maintenance shop. The County recycles metal from County projects	YES
9	Additional Strategy: Dead Animal Removal	The County removed dead animals from the roadside		Documentation of dead animal disposal is attached. (See Document 5-9)		
10	Additional Strategy: Clearing of drainage structures	The County cleared and removed trees and brush from drainage ways/rights-of-way as needed.		Report of hours and dates for brush removal is attached. (See Document 4-1)		
11	Additional Strategy: Free Garbage Disposal Days	Advanced Disposal had open-top containers at several locations across the County on May 1, August 7 and November 6, 2021 and February 5, 2022 for residents in unincorporated areas of the County. Event is advertised through public notices and at the Commission Meetings.	To reduce illegal dumping, the County will continue to provide quarterly free disposal days.	Public notices for each date are attached. (See Document 1-11)		
12	Additional Strategy: Adopt-A-Mile Program	The County provided trash bags for cleanup, maintains the Adopt-A-Mile signs, and disposes of the garbage collected.	The County will continue to support the Adopt-a-Mile program. The County will maintain the Adopt-a-Mile signs along adopted roadways, provide trash bags to groups for Adopt-a-Mile cleanup events, and dispose of the collected litter in a permitted landfill following each event.	PALS program brochure, County Adopt-A-Mile policy as well as other programs of ALPALS are attached. (See Document 1-13)		
13	No Dumping Signs: Maintain signs and place additional signs in problem areas as necessary	The County maintained approximately 50 signs. Signs are placed upon request. If signs are ineffective, the litter enforcement agent becomes involved. If the area continues to have litter issues, it is considered for surveillance. The County has two cameras that are rotated to different areas on an as needed basis.	The County will continue to provide "No Dumping" signs upon request.	Pictures of the sign and typical placement are attached. (See Document 1-10)	The County maintains "No Dumping \$500 fine" signs and these No Dumping areas are under video surveillance signs. These are put out in the County through Keep Etowah Beautiful as part of the effort to eliminate/reduce unauthorized disposal of waste.	

ETOWAH COUNTY						
CONTROL MEASURE 5 - POLLUTION PREVENTION AND GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS						
See Section 6.5 of the Annual Report and Section 10.5 of the 2017 SWMPP						
ACTIVITY NO.	STRATEGIES	2021-2022 IMPLEMENTATION STATUS	2022-2023 PROPOSED EFFORTS	SUPPORTING DOCUMENTATION	COMMENTS	PROPOSED CHANGES
14	Additional Strategy: Continuing Education	Alabama Storm Water Association "Meeting MS4 Permit Requirements, Old & New" Clay Zahorscakh attended the conference on December 2, 2021. The purpose of this meeting was to share information and network.	County personnel will participate in meetings, seminars, or other events held by the Alabama Stormwater Association (ASA) when possible.	Associated documentation is attached. (See Document 1-15)		

ETOWAH COUNTY MS4 FACILITY INVENTORY

1. ETOWAH COUNTY COURTHOUSE
800 FORREST AVENUE
GADSDEN, AL 35901
2. GADSDEN SHOP
402 TUSCALOOSA AVENUE
GADSDEN, AL 35901
3. ATTALLA LOCATION
1950 US HIGHWAY 431 NORTH
ATTALLA, AL 35954

**Supporting documentation is
available upon request.**

**Etowah County Engineering Department
256-549-5358**