



**City of Dothan, Alabama  
Storm Water Management Program Plan (SWMPP)  
Small Municipal Separate Storm Sewer System (MS4)  
General NPDES Permit  
Permit Number ALR040007**

**March 2022**

**Certification**

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

Mark Saliba, Mayor  
Name and Title (type or print)

  
Mark Saliba, Mayor (Signature)

3-29-2022  
Date

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## **Introduction**

The purpose of this plan is to illustrate how the City of Dothan will manage the Small Municipal Separate Storm Sewer System (MS4) as required by the National Pollutant Discharge Elimination System (NPDES) General Permit ALR040007. Additionally, it is the intention of this plan to validate the City's obligation to be a good steward of the local environment and water resources. According to 40 CFR 122.26(b)(16) (below) the City of Dothan maintains a small MS4.

- (16) *Small municipal separate storm sewer system means all separate storm sewers that are:*
- (i) *Owned or operated by the United States, 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) *Not defined as "large" or "medium" municipal separate storm sewer systems pursuant to paragraphs (b)(4) and (b)(7) of this section, or designated under paragraph (a)(1)(v) of this section.*
  - (iii) *This term includes systems similar to separate storm sewer systems in municipalities, such as systems at military bases, large hospital or prison complexes, and highways and other thoroughfares. The term does not include separate storm sewers in very discrete areas, such as individual buildings.*

The Small Municipal Separate Storm Sewer System General National Pollutant Discharge Elimination System (NPDES) Permit requires the permit holder to develop, implement, and enforce a Storm Water Management Program Plan (SWMPP) designed to reduce the discharge of pollutants from the MS4 to the maximum extent practicable (MEP) to protect water quality and to satisfy the appropriate water quality requirements of the Clean Water Act. The SWMPP will include management practices, control techniques and systems, and design and engineering methods for the control of pollutants.

## **Site Description**

The City of Dothan is located in Southeast Alabama, primarily in Houston County, but lies in parts of Dale and Henry County, as well. The population, according to the 2020 U.S. Census Bureau's estimates is 71,072. There are approximately 89 square miles within the City limits (see Appendix A for City map), with approximately 314.5 miles of streams and creeks. The City's MS4 lies within the Choctawhatchee and Chattahoochee River basins, which is broken down into several sub basins. The City is continuously updating its GIS mapping each year to include new data, as well as any missing or inaccurate data.

## **History of the Plan**

The City of Dothan (City) filed the initial Notice of Intent (NOI) for the Small Municipal Separate Storm Sewer System (MS4) General Permit in March of 2003. Each year the City has submitted an annual report to ADEM describing actions taken in that year. In 2013 and 2016, the City submitted an updated Storm Water Management Plans (SWMP). This SWMPP (2022) is a revision of the previous SWMP submitted in 2016.

## **SWMPP Requirements**

As part of the MS4 Phase II requirements, the City of Dothan must develop, implement and enforce a SWMPP designed to reduce the discharge of pollutants from its MS4 to the maximum extent practicable (MEP) to protect water quality and satisfy the appropriate water quality requirements of the Clean Water Act. The City of Dothan shall use all known, available, and reasonable methods of prevention, control and treatment (Best Management Practices or BMPs) to prevent and control storm water pollution from entering waters of the State of Alabama. The SWMPP shall include:

- a. Management Practices
- b. Control techniques and system design, and engineering methods
- c. BMPs
- d. Coordination among entities
- e. Measurable goals for each of the BMPs
- f. Person or persons responsible for implementing and coordinating BMPs

Furthermore, the SWMPP must address the five (5) Minimum Control Measures (MCM), which are:

1. Public Education and Public Involvement on Storm Water Impacts
2. Illicit Discharge Detection and Elimination (IDDE)
3. Construction Site Storm Water Runoff Control
4. Post Construction Storm Water Management in New Development and Redevelopment
5. Pollution Prevention / Good Housekeeping for Municipal Operations

Each of these control measures and BMP's will have measurable goals, where applicable. Measurable goals will allow the City to assess the effectiveness of stormwater control measures and BMP's.

## **Responsible Party**

The City's Stormwater Management Program Plan (SWMPP) is composed of several programs, activities, and functions operating under multiple Departments and Divisions within the City's organization to achieve the five (5) Minimum Control Measures (MCM). The key Departments are as follows:

- **City of Dothan Commission** – The City Commission is the legislative body for the City and is responsible for adopting resolutions, ordinances and budgets related to the implementation of the SWMPP.
- **Mayor's Office** - The Mayor is the executive for the City and is responsible for the overall oversight of the program and for maintaining communication between the Commission and the Departments.
- **Public Works Department** – Manages overall compliance with Phase II Stormwater Permit. Performs maintenance of stormwater infrastructure and assists with inspections of residential and commercial construction; Performs annual detention pond inspections; Operates and manages the street sweeping program; Monitors residential and commercial construction and conducts erosion and sediment control inspections; Arbor Day Tree Giveaway; Manages water quality sampling program; Operates the landfill, trash and garbage collection, and recycling program; Manages public education and outreach program.
- **Planning and Development Department (Includes Building Permits and Inspections)** – Monitors residential and commercial building construction; Building Code Enforcement; Oversees Planning Commission
- **Police Department** – Enforces Illicit Discharge Ordinance.
- **Leisure Services** – Performs maintenance of City parks
- **Information Technology Department** – Website Maintenance

- **Dothan Utilities** – Groundwater Education Day; Manages utility construction projects
- **General Services** – City Building and Grounds Maintenance, and some ROW mowing

The person responsible for the coordination and implementation of the individual SWMPP is as follows:

Randall S. Morris, P.E., Assistant City Manager, Acting Public Works Director  
Public Works Department  
City of Dothan  
P.O. Box 2128  
Dothan, AL 36302  
(334) 615-4400

## **Public Education and Public Involvement on Stormwater Impacts**

### **Permit Requirements**

The Public Education and Public Involvement (MCM 1) requires the City to develop and implement a public education and outreach program that informs the community about the impacts of storm water discharges on water bodies and steps the public can take to reduce pollutants in storm water runoff to the maximum extent practicable (MEP).

### **Rationale Statement**

The City's goal is to have a responsible public education and outreach program that aims to inform all target audiences within the City on the steps that they can take to reduce stormwater pollution in their daily routine. In addition to this informative stormwater pollution prevention strategy, the City will work to educate these target audiences on how to become involved in the City's stormwater program through the best management practices (BMP) detailed below.

1. The primary target audiences within the City and the rationale for selecting these audiences are listed below:
  - a. **General Public (homeowners and citizens)** – Potential contributors of stormwater pollution through activities such as illicit discharges and over-fertilization of lawns. The primary pollutants potentially contributed by this target audience are litter, nutrients, and pathogens.
  - b. **Engineers, Developers and Contractors** – Potential contributors of stormwater pollution through development and construction activities as well as engineering design of stormwater pollution prevention best management practices. The primary pollutants potentially contributed by this target audience are sediment and nutrients. This group will be instrumental in designing for Low Impact Design (LID).

- c. **Landscape Companies** – Potential contributors of stormwater pollution primarily through lawn maintenance activities. The primary pollutants potentially contributed by this target audience are excess nutrients.
  - d. **Local Businesses** – Potential contributors of stormwater pollution through activities such as illicit discharges and daily business activities. The primary pollutants contributed by this target audience are excess litter, nutrients, and pathogens.
2. The Public education and outreach strategy for each target audience will vary depending on the type of audience, type of pollutant, contribution, potential risk and impact of pollutant contribution and current level of education of each target audience on the City’s stormwater management program.
3. Overall management and implementation of the City’s stormwater education and outreach program is as follows:
- a. Public Works Department – Manages overall SWMPP and compliance with Phase II Stormwater Permit; Monitors residential and commercial site development construction and conducts erosion and sediment control inspections; Manages public education and outreach program; Performs maintenance of municipally owned stormwater infrastructure; Performs annual detention pond inspections; Operates and manages the garbage/recycling/trash programs; Operates and manages the street sweeping program.
  - b. Leisure Services Department – Provides pet waste bags in City parks. Provides stormwater brochures at some City parks.
  - c. Dothan Utilities – Groundwater Education Day, inspection of public projects pertaining to water, sewer, and electrical utilities.
  - d. Planning and Development Department – Monitors residential and commercial building construction and conducts erosion and sediment control inspections at residential building sites.

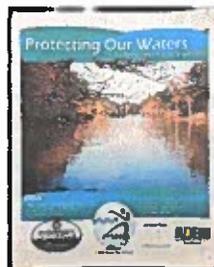
Overall success of our public education and outreach program will ultimately be gauged by the level of awareness in the community regarding their role in the City's stormwater management program.

4. Specific components and measurable goals within our public education and outreach program will consist of, but not be limited to, the following best management practices (BMPs):

**BMP #1: Brochure/Publications:**

Promoting green space and stormwater management. Available at City offices or on-line. In the first year of this permit cycle the City will look for more current brochures, as well as find additional locations to make the brochures available to the public. Locations may be changed and/or added each year based on the effectiveness of the location.

- a. Conserve Alabama website, by Alabama Soil and Water Conservation Committee. Website link on City of Dothan Stormwater web page.  
<http://www.dothan.org/index.aspx?nid=311>
- b. "Protecting Our Waters, the Choctawhatchee, Pea and Yellow Riverbasins", brochure available at City offices.



- c. *BMP Minimum Requirements*, City of Dothan handout – Silt Fence and Construction Entrance details (provided in commercial and residential permit packets, see Appendix M for these details).

- d. *Car Wash Flyer*, In September 2018 the City published a flyer about car washing and pollution generated by washing cars. These flyers have been stationed in several locations in City offices.



**Measurable Goals:** Record the number of brochures removed yearly, in the first year. Once the brochures have been placed at additional locations the City will keep track of the number of brochures removed by location. The City will report the previous information, an example of the brochure, and any location changes in the annual report.

**Target Audience:** General Public (homeowners and citizens), Engineers, Developers and Contractors, Landscape Companies and Local Businesses

**BMP #2: City Website ([www.dothan.org](http://www.dothan.org)) has Informative Links for:**

- a. Code of Ordinances – City of Dothan
  1. Subdivisions
  2. Zoning
  3. Illicit Discharge Ordinance/Stormwater Management

[https://www.municode.com/library/al/dothan/codes/code\\_of\\_ordinances](https://www.municode.com/library/al/dothan/codes/code_of_ordinances)

- b. Public Works
  1. Engineering Services – Stormwater Management

- a. Current Storm Water Management Program Plan (SWMPP)
  - b. Latest Annual Storm Water Report
  - c. Link to EPA Website
  - d. Link to ADEM Website
  - e. Link to Choc, Pea, Yellow River WMA
  - f. Link to AL Soil & Water Conservation Committee
  - g. Link to ADEM LID Handbook
  - h. Link to EPA Urban Runoff LID
2. Recycling

<http://www.dothan.org/index.aspx?nid=305>

**Measurable Goals:** Record number of “Hits” received on the City Website for each link.

**Target Audience:** General Public (homeowners and citizens), Engineers, Developers and Contractors, Landscape Companies and Local Businesses

### **BMP #3: Public Input**

The City will annually solicit comments on the SWMMP from the public via social media and posting the SWMPP on the City’s website.

**Measurable Goals:** Report participation level by number of responses received annually and update the SWMPP as needed.

**Target Audience:** General Public (homeowners and citizens), Engineers, Developers and Contractors, and Local Businesses

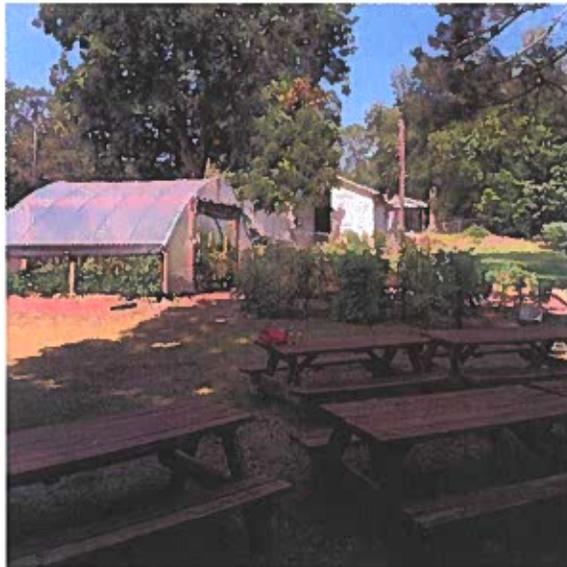
**BMP #4: Aunt Katie’s Garden (Demonstration Project):**

Aunt Katie’s Community Garden is a resurgence of the Victory Garden of the past. A local vacant lot has been converted into a group of individual vegetable gardens that neighborhood people work and reap the benefits of fresh vegetables.

Aunt Katie’s Garden is one of 1900 areas in the U. S. that are “peoples’ gardens”. This distinction comes by 1) helping the needy, 2) being sustainable and 3) being considered a pocket park.

The link below is to Aunt Katie’s facebook page:

<https://www.facebook.com/AuntKatiesCommunityGarden>



**Measurable Goals:** Each year the city will report any known improvements to this facility. The City will also report the number of Facebook likes and followers this facility receives each year.

**Target Audience:** General Public (homeowners and citizens)

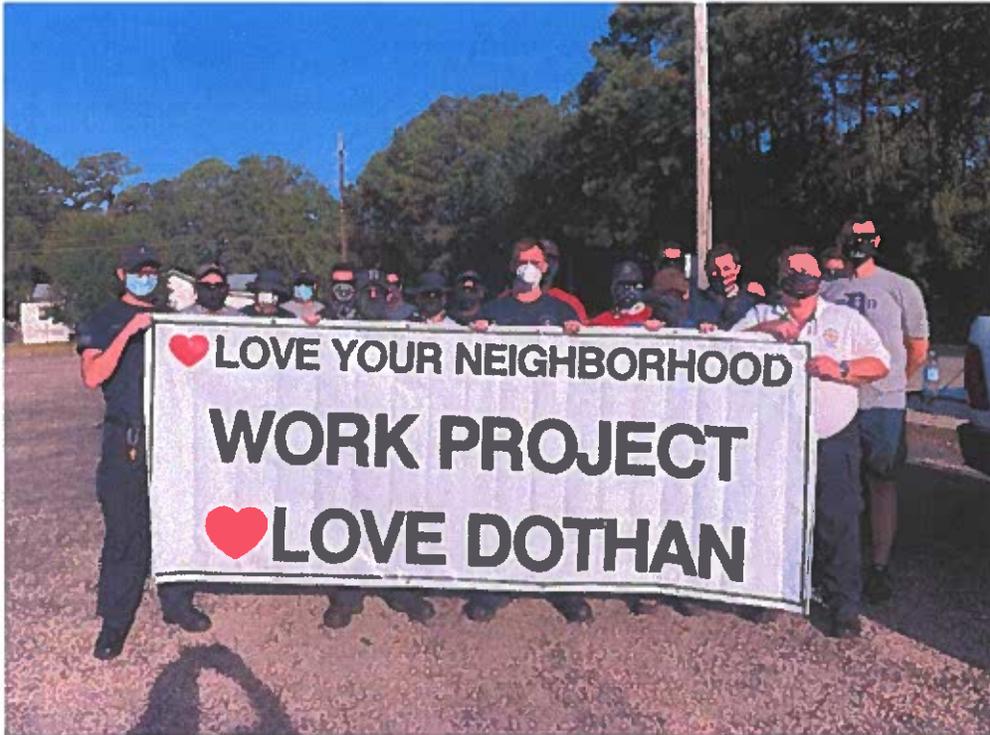
## **BMP #5: Community Events (Annual)**

The City of Dothan will participate in a minimum of two (2) public events each year. Participation will include but not be limited to advertising (Website & Facebook), equipment (Touch-A-Truck), funding, or providing City personnel.

The following public events are examples of events the City has been involved in past years:

- **Touch-A-Truck:** City Public Works Department provides a truck (garbage and/or recycling) for interaction with school age children at Landmark Park.
- **Arbor Day Tree Give Away:** Increasing the native urban tree canopy in Dothan provides many benefits to water quality and habitat. Trees reduce stormwater runoff by absorption (infiltration) and their roots help prevent erosion. Therefore, the City is excited each year to celebrate Arbor Day by giving away trees. The City will track the number of trees given away and report the data in the annual report.
- **Engineering Day:** Engineering Day is a new public event put together by the local ASCE chapter. This is a public event for, upper level, high school student to learn about the different engineering roles.
- **Groundwater Education Day:** Groundwater Education Day is an effort to educate fourth grade students about all aspects of the water cycle and other related natural resources. These efforts also instill in the students a general environmental awareness and stewardship specific protection strategies. It is an all-day event centered around hands on learning about watersheds and the importance of water. The City has participated actively in the event. These efforts of participation will continue in the future.

- **Love Dothan, Love your Neighborhood Projects:** Dothan's City Manager, Kevin Cowper, envisioned the City's future by developing the Love Dothan Campaign. Under the umbrella of Love Dothan, there are 8 sub-initiatives of the program including Love Your Local Businesses, Love Your City Employees, Love Your Downtown, Love Your Neighbor, Love Your Neighborhood, Love Your Orange Barrels, Love Your Schools, and Love Your Work.



**Measurable Goals:** Each year the city will report the events it participated in, the approximate public attendance, and the overall success of the event.

**Responsible Person(s):** Public Works and Dothan Utilities

**Target Audience:** General Public (homeowners and citizens)

## **BMP #6: Pet Waste Bags in City Parks:**

Pet waste bag dispensers are available in City parks. Pet waste bags are available free to the public and encourage removal of pet waste from public areas. The park staff is responsible for keeping pet waste bag dispensers full. This helps keep pet waste out of storm drains and area waters.



**Measurable Goals:** Report number of waste bags used in annual report.

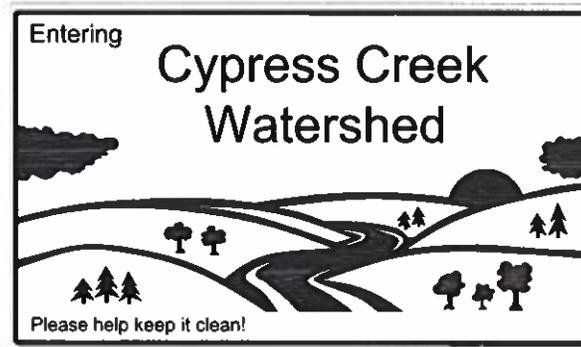
**Responsible Person(s):** Leisure Services (Park Staff)

**Target Audience:** General Public (homeowners and citizens)

## **BMP #7: Watershed Signage and Environmental Awareness Signage**

**Watershed Signage on Thoroughfares:** Watersheds are a logical way to think about the connection between the land and water quality. How we manage and treat the land has a direct impact on the ability of water to support a number of important public uses like swimming, fishing, aquatic species habitat and clean drinking water supply. This will raise awareness of the individual watersheds

within the City and the names and locations of the streams. The following is an example of the approved sign.



In the first year of this permit cycle the City plans to start making and installing the signage at the identified locations. Each year the City plans to add a minimum of two (2) watershed signs until all signs have been installed.

**Measurable Goals:** The City will report the number of signs installed each year and the locations they were installed.

**Responsible Department:** Public Works

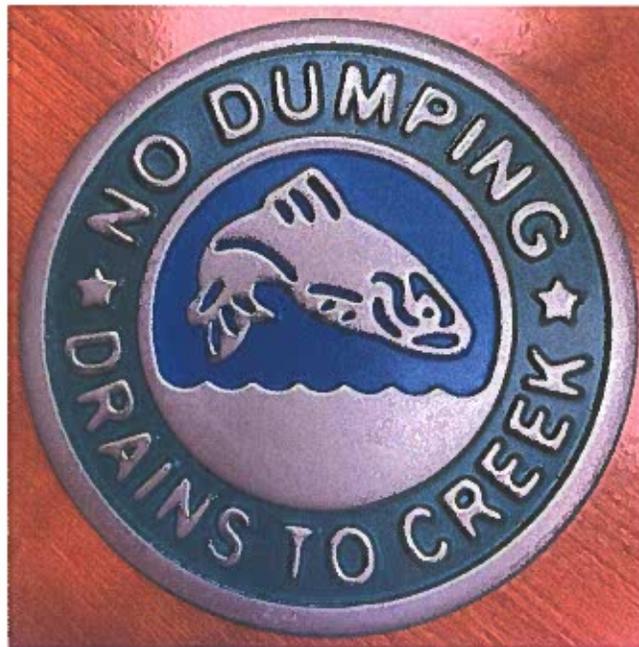
**Environmental Awareness Signage:** In 2015, the City began requiring all stormwater manhole lids to state “No Dumping Drains to Waterways” for all new construction projects. This is being done to give notice to the public that whatever enters the stormwater system will “Drain to Waterways”. The following is an example of a storm drainage lid that was installed on a City drainage project.



**Measurable Goal:** Continue to require “No Dumping” lids for developments and continue research on feasible ways to convert existing lids.

**Responsible Department:** Public Works

**Environmental Awareness Signage:** In 2021, the City began attaching these colorful stormwater awareness markers to existing stormwater inlets in high foot traffic areas, like parks and downtown sidewalks. This is being done to give notice to the public that whatever enters the stormwater system will drain to waterways. The following is an example of a storm drainage marker that was installed in a City park.



**Measurable Goal:** Continue to install these markers in high foot traffic areas and track the number installed annually.

**Responsible Department:** Public Works

## **Illicit Discharge Detection and Elimination Program**

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

1. **Permit Requirement:** The Illicit Discharge Detection and Elimination Program (MCM 2) requires the City to develop, implement, enforce and evaluate a program to detect and eliminate illicit discharges and improper disposal, including spills not under the purview of another responding authority, into the City’s regulated MS4 area, to the maximum extent practicable. The program must include the following:
  - a. Annually update the stormwater infrastructure inventory map, showing the location of all outfalls and the names and locations of all waters of the State that receive discharges from those outfalls; structural BMPs owned, operated, and maintained within the boundaries of the City’s MS4 area.
  - b. To the extent allowable under State or local law, effectively prohibit; through ordinance, or other regulatory mechanism, non-stormwater discharges into the MS4 and implement appropriate enforcement procedures and actions. The ordinance may be updated when necessary.
  - c. Locate and address non-stormwater discharges, including illegal dumping, to the system that are not authorized by a separate NPDES permit.
  - d. Inform public employees, businesses and the general public of the hazards that are generally associated with illegal discharges and improper disposal of waste.
2. **Exclusions:** The Illicit Discharge Detection and Elimination MCM will include measures to control illicit discharges and improper disposal of wastes into stormwater. In the execution of this element, the City of Dothan will exclude the

following categories of non-stormwater discharges that are not required to be addressed by the State:

- a. Water line flushing (including fire hydrant testing)
  - b. Landscape irrigation
  - c. Diverted stream flows
  - d. Rising ground waters
  - e. Uncontaminated ground water infiltration (infiltration is defined as water other than wastewater that enters a sewer system, including sewer service connection and foundation drains, from the ground through such means as defective pipes, sewer service connections, or manholes. Infiltration does not include, and is distinguished from, inflow)
  - f. Uncontaminated pumped ground water
  - g. Discharges from potable water sources
  - h. Uncontaminated groundwater from under drains (French drains or tile drains)
  - i. Air conditioning condensation
  - j. Irrigation water
  - k. Springs
  - l. Water from crawl space pumps
  - m. Foundation or footing drains
  - n. Lawn watering
  - o. Individual residential car washing
  - p. Flows from riparian habitats and wetlands
  - q. Swimming pool discharges (if dechlorinated - typically less than one part per million chlorine)
  - r. Street wash water
  - s. Discharges or flows from firefighting activities
3. Target Pollutants and Sources: Non-point pollutants found in stormwater will be targeted by MCM 2. These pollutants include, but are not limited to: sediment, paints, fertilizers, pesticides, swimming pool discharges, pathogens, oils and greases. The sources that are targeted include, but are not limited to: illegal

dumping, failing septic systems and/or illicit connections, swimming pool illicit connections, un-permitted construction site discharges, improper disposal of fertilizers, pesticides, herbicides, paints, etc.

4. Strategies, Goals and Timelines: The City will employ a variety of strategies for MCM 2 from enforcement of ordinances to education outreach. The City's goal is to reduce illicit discharge to its MS4 to the maximum extent practicable. Each strategy will be detailed below along with its goal and department responsible for implementation of measure.

**BMP #1: Illicit Discharge Ordinance:**

Chapter 83, Stormwater Ordinance was adopted by the City Commission in March of 2012. Article I is specific to Illicit Discharge.

“This article is enacted to preserve, protect and promote the health, safety and welfare of the citizens of Dothan, Alabama, through the reduction, control and prevention of the discharge of pollutants to the city municipal separate storm sewer system (MS4). It is the expressed intent of this document to provide for and promote compliance by the city with federal and state laws governing the discharge of pollutants from the MS4 and to provide for and promote compliance with an NPDES permit issued to the city for such discharge. The city does not intend for this article to conflict with any existing federal or state law. The objectives of this ordinance are:

1. To regulate the contribution of pollutants to the municipal separate storm sewer system (MS4) by stormwater discharges by any user;
2. To prohibit Illicit Connections and Discharges to the municipal separate storm sewer system;
3. To establish legal authority to carry out all inspection, surveillance and monitoring procedures necessary to ensure compliance with this ordinance”

Penalty for non-compliance: Up to \$500

**Responsible Departments:** Planning and Development (Code Enforcement Officer), Police (Environmental Compliance Officers) and Public Works Department (Civil Engineer and Inspectors)

**Measurable Goal:** Each year the City will review the illicit discharge ordinance. If any changes are made to this ordinance, they will be reported in the next annual report.

**BMP #2: Compiling and Organizing Existing City Stormwater Infrastructure Data:**

This element of MCM 2 will involve staff locating all existing stormwater infrastructure data in GIS format and updating maps. Currently, the City has a map showing the location of existing stormwater outfalls that discharge to state waters. The map is included in the annual report.

**Measurable Goal:** The City continually updates the current stormwater map showing all known City stormwater outfalls that discharge directly to State waters. An updated map is included in the annual report (both printed and electronic copies).

**Responsible Departments:** Public Works

**BMP #3: Dry Weather Screening**

The intent of this BMP is to detect and address non storm water discharges to the City's MS4. The City has prepared a map (Appendix B) showing all the major outfalls being screened within the City's MS4 (based on the City's GIS map). In the event that one or more of the locations are unable to be accessed the inspector may adjust the location to the nearest accessible point, upstream or downstream (see Appendix G for Dry Weather Screening Standard Operating Procedure (SOP)). If during normal work activities, additional outfalls are discovered they

will be added to the list of dry weather outfalls. If the dry weather outfall shown on the map is determined not to be a major outfall is shall be removed from the list.

The City will inspect fifteen (15) percent of all known major outfalls each year, with one hundred (100) percent of the outfalls inspected within five (5) years. There are currently 37 outfalls identified in the City. Six will be required to meet the 15% minimum per year, with a goal of 8 per year inspected.

**Measurable Goal:** The City will maintain a list of all major outfalls screened with the date each outfall was inspected. This list will be provided in the annual report.

**Responsible Departments:** Public Works

**BMP #4: Litter Control**

The intent of this BMP is to reduce the amount of litter within the stormwater system. In the City of Dothan Code of Ordinance, Chapter 82 Solid Waste, Article VII Littering, Unauthorized Activities (82-111 thru 82-116), describes what and how litter will be addressed within the City.

Sec. 82-111. - Unauthorized dumping is littering.

- a. It shall be unlawful for any person to knowingly deposit in any manner litter on any public or private property or in any public or private waters having no permission to do so.
- b. For purposes of this subdivision, items found in an accumulation of garbage, trash or other discarded material including, but not limited to, bank statements, utility bills, bank card bills, and other financial documents, clearly bearing the name of a person shall constitute a rebuttable presumption that the person whose name appears thereon knowingly deposited the litter. Advertising, marketing, and campaign materials and literature shall not be sufficient to constitute a rebuttable presumption of criminal littering under this subsection.

- c. No action for criminal littering based on evidence that creates a rebuttable presumption under subsection (a) shall be brought against a person unless he or she has been given written notice by a designee of the city commission that items found in an accumulation of garbage, trash, or other discarded materials contain his or her name, and that, under subsection (a), there is a rebuttable presumption that he or she knowingly deposited the litter. The notice shall advise the person that criminal littering is a misdemeanor, and shall provide that, unless the person can present satisfactory information or evidence to rebut the presumption to the designee of the governing body within 15 days of the date of the notice, an action for criminal littering may be filed against him in the municipal court. If the person responds to the notice and presents information or evidence to the designee of the city commission, the designee shall review the information or evidence presented and make a determination as to whether or not an action should be brought against the person for criminal littering. The designee shall provide written notice to the person of its determination, and if the intent is to proceed with an action for criminal littering, the notice shall be sent before any action is filed.

(Ord. No. 2007-117; § 1, 4-3-07)

**State Law reference**— Ala. Code 1975 Sec. 13A-7-29.

Refer to City of Dothan, Solid Waste Ordinance for additional information about littering and unauthorized activities:

[https://www.municode.com/library/al/dothan/codes/code\\_of\\_ordinances?nodeId=PTIICOOR\\_CH82SOWA\\_ARTVILIUNAC](https://www.municode.com/library/al/dothan/codes/code_of_ordinances?nodeId=PTIICOOR_CH82SOWA_ARTVILIUNAC)

The City of Dothan has the following signage at different locations throughout the city to deter residents from littering:



Additionally, the City of Dothan maintains an annual contract with Wiregrass Rehabilitation Center (WRC) to pick up roadside litter on Ross Clark Circle, all major streets, and other select locations around the City.

**Measurable Goal:** The City will maintain and report the tonnage of litter collected each year and report it in the annual report.

**Responsible Departments:** Public Works

**BMP #5: Perform Field Assessments and Site Inspections:**

To reduce the amount of pollutants in runoff, City crews regularly perform maintenance and cleaning on roadways, ditches, culverts, grounds, parks and creek channels.

Field assessments are observations made during the daily duties of the City programs. Currently, if a potential illicit discharge is discovered during a field assessment, depending on severity of the discharge, either the Fire Department is notified and/or Engineering Services. The potential discharge is investigated as a site inspection.

A site inspection is a field visit outside of an employee's normal duties in response to reports of potential non-compliance, or as a result of program directives. The inspection is recorded in a database maintained by the Public Works Department.

A process will be established for each department's designated field personnel to report non-stormwater discharges that are potentially in violation to the appropriate City staff. Designated City personnel will be trained in general stormwater quality practices. Any changes will be updated in the City's SWMPP and included in the City's SWMPP annual report.

**Measurable Goals:** The City will:

1. Designate responsible personnel within department for field assessments and site inspections – Public Works Engineering Services staff are responsible for this, along with the Police Department's Environmental Compliance Officer(s).
2. Initiate basic field assessments to establish priority areas and major outfalls for the more focused inspections. Screen major outfalls.
4. Respond per established procedures to all identified and reported potential illicit discharges and connections.
5. Collect and review data regarding enforcement activities, as part of the annual report, to identify the principle pollutants and areas of concern throughout the City.

**Responsible Departments:** Dothan Utilities, Fire Department, Public Works, and Planning and Development

**BMP #6: Hazardous Materials Response Program:**

The stormwater program will be coordinated with the existing hazardous materials response program offered by the City's Fire Department. The City of Dothan Hazmat team responds to all hazmat calls within the MS4 area. The Hazmat team reports all reportable spills directly to ADEM (see Appendix C). The Public Works Department and other entities that respond to spills will also be involved in this effort.

The City has established a section on the City's Web Page for public inquiries about IDDE and a section which will allow the public to report any potential illicit discharges.

<http://www.dothan.org/index.aspx?NID=493>

**Measurable Goals:** The City of Dothan will report the number of hazardous calls each year in the annual report. Additionally, the City will report any potential illicit discharges reported by the public on the website.

**Responsible Departments:** Fire, Police and Public Works

**BMP #7: Training:**

The goal of this element is to assure the City staff understand stormwater issues and are appropriately trained to recognize and report illicit discharges and connections while performing their normal duties in the field. Training will be provided to public works and other employees. These training sessions may be offered in conjunction with other training elements.

The City of Dothan's Public Works Department, Planning Department, and Dothan Utilities Department has Qualified Credentialed Professionals (QCP) and Qualified Credentialed Inspectors (QCI) that design and inspect erosion control

BMPs for City of Dothan projects. Additionally, Engineering Services (Public Works) and Permits and Inspections (Planning Department) have QCI certified inspectors that inspect erosion control BMPs on residential and commercial projects within the City's MS4.

**Measureable Goals:** Provide one IDDE training session annually for employees with program responsibilities.

**Responsible Departments:** Public Works

**Evaluation:** The City has seen minimal intentional illicit discharge events. Illicit discharges are primarily caused by traffic crashes and are handled by emergency services.

**BMP #8: Fats, Oils, and Grease Control:**

On December 15, 2015 the City of Dothan approved a Fats, Oils, and Grease Control ordinance. This ordinance sets for requirements to aid in the prevention of sanitary sewer blockages, obstructions, and overflows due to the contribution and accumulations of fats, oils, and grease (FOG) into the City sewer system from commercial, industrial, religious, and institutional food service establishments. The objective is to eliminate FOG related sanitary sewer overflows and sewer line blockages to protect the area streams, prevent residential and commercial property damage, decrease sewer line maintenance costs, and to improve environmental quality.

City of Dothan FOG Website:

<http://www.dothan.org/index.aspx?nid=537>

City of Dothan, Chapter 102 Utilities, Article IV Sewer, Division 5 Fats Oils and Grease Control:

[https://www.municode.com/library/al/dothan/codes/code\\_of\\_ordinances?nodeId=PTIICOOR\\_CH102UT\\_ARTIVSE\\_DIV5FAOIGRCO](https://www.municode.com/library/al/dothan/codes/code_of_ordinances?nodeId=PTIICOOR_CH102UT_ARTIVSE_DIV5FAOIGRCO)Additional FOG

Additional FOG Information:

[http://www.dothaneagle.com/news/government/dothan-will-begin-regulating-grease-entering-sewer-system/article\\_061bb8fe-a383-11e5-aa39-87f19a339f75.html](http://www.dothaneagle.com/news/government/dothan-will-begin-regulating-grease-entering-sewer-system/article_061bb8fe-a383-11e5-aa39-87f19a339f75.html)

**Measureable Goals:** Reduce SSOs due to fats, oils, and grease within the MS4 by requiring and routinely inspecting grease control equipment.

**Responsible Departments:** Dothan Utilities

## **Construction Site Storm Water Runoff Control**

### **Permit Requirements**

Enforce a program to reduce pollutants in stormwater runoff from construction activities, both public and private. The program shall include requirements for construction site operators to control waste; procedures for site plan review; procedures for receipt and consideration of information submitted by the public; and procedures for site inspection and enforcement of control measures (i.e. BMP inspections).

### **Responsible Departments**

Public Works Department, Planning and Development Department, Dothan Utilities.

### **Rationale Statement**

The City of Dothan has a Construction Site Stormwater Runoff Control program (MCM 3) to control erosion and sedimentation. This program is applicable to all construction and land disturbance sites, and is not limited by the size of the site (sites under an acre, as well as over an acre, are included in the program). This program includes project review, BMP inspections and enforcement of construction related ordinances for environmental protection. The Public Works, Dothan Utilities, and the Planning and Development Department have QCI trained staff to conduct BMP inspections. Furthermore, City crew leaders in each department are offered an overview of the Construction Site Stormwater Runoff Control program (including stormwater standards at local and state levels) through training offered by City personnel.

### **BMPs / Mechanisms:**

Used for Construction Site Stormwater Runoff Control

1. Design Review
2. BMP Inspections and Code Enforcement / Procedures for Non-Compliant Sites
3. City Ordinances
4. Educational Material Available in the Public Works Department

## **BMP #1 Design Review:**

The City of Dothan Public Works and Planning and Development Department review process includes:

- a. Preliminary Plats for Subdivision
- b. Building Permits
- c. Land Disturbance Permits
- d. Pre-Construction Meetings – off site with engineer of record
- e. Construction Plans
- f. Final Plats for Subdivision

## **General Procedure of Submittal Review:**

### **Commercial:**

For the commercial submittals, stormwater drainage is reviewed for compliance with the City of Dothan Stormwater Ordinance in the Construction Plans review. Design review is performed independently by various City of Dothan Department representatives. The Public Works Department is the representative for stormwater, erosion control, floodplain management, and site development reviews. However, the applicant's engineer is the person ultimately responsible for drainage and erosion control BMPs compliance with the City's regulations. The developer's engineer is responsible to ensure the developer has submitted for an NPDES permit prior to construction activities (see Appendix D for SOP, Commercial Development Review).

The comments generated during design review are sent to the applicant. The applicant addresses the comments and resubmits plans. The City of Dothan then approves the construction plans or provides additional comments to be addressed.

### **Residential:**

For the residential and commercial subdivision applications, stormwater drainage is reviewed for compliance with the City of Dothan Subdivision Regulations in the Construction Plans review. A design review meeting may be held and attended by the various City of Dothan Department representatives, design

engineers, utility owners or other involved parties. The Public Works Department is the representative for Stormwater reviews. However, the applicant's engineer is the person ultimately responsible for drainage compliance with the City's regulations. The developer's engineer is responsible to ensure the developer has an NPDES permit. The comments generated during and after the design review meeting are compiled in a review letter which is sent to the applicant. The applicant provides a response letter. The City of Dothan then approves the construction plans or provides additional comments to be addressed.

All preliminary subdivision plat submittals with more than 5 lots require a public hearing through the Planning Commission. Notification requirements are as required by State law and the City of Dothan Subdivision Regulations. The City of Dothan Planning and Development Department coordinates plan reviews of commercial submittals for permit issuance. The City of Dothan Public Works Department coordinates plan reviews of residential subdivision for permit issuance.

Pre-Design meetings may be held with the applicant after Preliminary Plat approval and before submittal of construction plans. During the pre-design meetings, City staff meets (typically off site) with the applicant's engineer of record to address specific issues such as wetland buffer protection, on-site erosion controls, drainage concerns, potential utility conflicts and design issues.

The Final Plat approval phase is after the final inspection of installed subdivision infrastructure takes place and a final punch list is generated. A site inspection takes place and any deficient items are addressed during this inspection process. The site inspection is conducted by the same Department Supervisors/Representatives who perform the preliminary design review (see Appendix D for SOP, Residential Development Review).

#### **Public Works:**

All City of Dothan job sites are public works construction sites. Each site will be reviewed by a City of Dothan QCP to determine the BMPs needed for that

project. If the ground disturbed is greater than one (1) acre an NPDES permit is required and monthly inspections are required, per the permit, by a City of Dothan QCI. The Public Works or Dothan Utilities Departments are responsible for their project inspections and maintaining inspection records for their projects. Each department will be responsible for maintaining a list of their current projects.

**Responsible Departments:** Public Works Department, Dothan Utilities and Planning and Development Department.

**Measurable Goals:** Maintain a record of all construction sites within the City's MS4 area. Document and report all changes and reviews of the City's ordinances and SOP's.

**BMP #2: BMP Inspections / Code Enforcement:**

The City of Dothan Stormwater ordinance is successful at minimizing sedimentation and erosion to the maximum extent practical. Construction sites with high impact potential and subdivisions under construction are inspected frequently. Construction sites with high impact potential include multi-family, non-residential, those near critical areas and/or those disturbing more than an acre. Other residential construction sites are inspected during infrastructure and subdivision construction. Monitoring with follow up inspections by building inspectors during home construction helps to ensure continued compliance.

City of Dothan Public Works, Planning and Development, and Dothan Utilities Departments have certified QCI Inspectors to conduct BMP inspections, as well as other inspections.

The initial BMP inspection is performed prior to other construction inspections. BMPs shall be established prior to and during any construction activities (public and private).

Constructions sites are inspected monthly and after significant rain events (greater than ¾") (see Appendix E for SOP, Construction Site Inspection). BMP inspections include:

- a. Initial
- b. Phasing (if applicable)
- c. Closure - Certificate of Occupancy

An Erosion Control and BMP Inspection Report will be completed during each BMP inspection (see Appendix J for blank copy of the Stormwater Inspection Report).

Procedures for non-compliant sites:

- a. Notice of Violation (written or verbal)
- b. Withheld Construction Inspections
- c. ADEM notification if water quality impact has occurred or compliance not achieved
- d. Stop Work Orders

**Responsible Departments:** Public Works, Dothan Utilities, and Planning and Development Departments.

**Measurable Goals:** QCI Re-Certification for Inspectors. Analyze inspection reports to evaluate the overall effectiveness of the plan.

**BMP #3: City Ordinances:**

Utilized for stormwater and stormwater management on construction sites:

- a. Chapter 42 – Floods (42-26 thru 42-101)
- b. Chapter 83 – Stormwater (83-1 thru 83-32)
  - a. Article 1 Illicit Discharge (Sec. 83-1 thru 83-18)
  - b. Article 2 Stormwater Management (Sec. 83-19 thru 83-32)
    - i. Stormwater and Stormwater Management Construction Best Management Practices Plan (Sec. 83-24)
- c. Chapter 90 – Subdivisions (90-1 thru 90-226)

**Responsible Departments:** Public Works Department and Planning and Development Department.

**Measurable Goals:** The City will review the stormwater ordinance annually to determine if updates or changes are need. Any change to the stormwater ordinance will be reported on the annual report.

**BMP #4: Educational Material:**

Brochures/booklets available to contractors/ developers (see also Public Education and Public Involvement on Stormwater Impacts, BMP #1 Brochure/Publications)

- a. Conserve Alabama website, by Alabama Soil and Water Conservation Committee. Website link on City of Dothan Stormwater web page.  
<http://www.dothan.org/index.aspx?nid=311>
- b. “Protecting Our Waters, the Choctawhatchee, Pea and Yellow Riverbasins”, brochure available at City offices.
- c. *BMP Minimum Requirements*, City of Dothan handout – Silt Fence and Construction Entrance details (provide in commercial and residential permit packets, see appendix M for these details).
- d. *Car Wash Flyer*, In September 2018 the City published a flyer about car washing and pollution generated by washing cars. These flyers have been stationed in several locations in City offices.

**Responsible Departments:** Public Works Department

**Measurable Goals:** Record the number of brochures removed yearly, in the first year. Once the brochures have been placed at additional locations, the City will keep track of the number of brochures removed by location. The City will report the

**previous information, an example of the brochure, and any added location or changes in the annual report.**

## **Post-Construction Storm Water Management in New Development and Redevelopment**

### **Permit Requirements**

Enforce a program to address stormwater runoff from new development or redevelopment projects that disturb greater than or equal to one acre by ensuring that controls are in place that would prevent or minimize water quality impact (MCM 4). Develop and implement strategies, which include a combination of structural and/or non-structural BMPs appropriate for the community. Use an ordinance or other regulatory mechanism to address post construction runoff from new development and redevelopment projects to the extent allowable under State or local law. Ensure adequate long-term operation and maintenance of BMPs. The City will encourage Low Impact Development (LID) by providing information to developers and designers.

### **Responsible Departments**

Public Works Department, Dothan Utilities and Planning and Development Department.

### **Rationale Statement**

The Planning and Development Department works closely with the City of Dothan Planning Commission (which meets monthly). This committee is appointed by the Mayor and City Commission, and works with the Planning and Development Department, Dothan Utilities and the Public Works Department with design and review procedures, as set forth in the Subdivision Regulations. The Planning Commission reviews amendments to the Subdivision Regulations. A post-construction strategies plan is submitted with either the construction plans or final plat for new development and redevelopment. The Public Works Department and Dothan Utilities addresses runoff issues from residential and commercial construction sites within the City of Dothan (including post construction residential, commercial and right-of-way/easement areas). The Public Works Department inspects and comments on issues with stormwater detention areas on an annual basis. The Public Works Department oversees maintenance of city-owned stormwater infrastructure.

## **BMPs / Mechanisms for Post-Construction Stormwater Management**

1. Subdivision Regulations: Link on-line:  
[www.dothan.org](http://www.dothan.org/planning/land%20development/subdivision%20regulations) (planning/land development/subdivision regulations)  
Stormwater Ordinance: Link on-line:  
[www.dothan.org](http://www.dothan.org/public%20works/engineering%20services/stormwater%20management) (public works/engineering services/stormwater management)  
Storm sewers and drainage within Subdivision Regulations (Subdivision Ordinance: Section 90-222(b))  
Low Impact Development (LID) links posted online.
2. Stormwater Projects
3. Stormwater Detention Pond Inspection Requirements
4. City Public Works employees for maintenance of stormwater structures
5. Groundwater Education Day
6. Litter Bugs
7. Litter (Solid Waste Ordinance: Section 82-111 thru 82-116)
8. Fats, Oils, and Grease Control (Utilities Ordinance: Section 102-366 thru 102-385)

### **BMP #1: Subdivision Regulations and the Stormwater Ordinance:**

The Subdivision Regulations and Stormwater Ordinance is available on-line for the public to view. Construction, development and re-development standards for stormwater are listed here. The following is the chapters and page numbers where they can be found in the City of Dothan's Code of Ordinances. Information on Low Impact Development can also be found on the City's website. Additionally, links to the ordinance and LID information are provided below.

1. Chapter 83 – Stormwater (83-1 thru 83-32)
  - a. Article 1 Illicit Discharge (Sec. 83-1 thru 83-18)
  - b. Article 2 Stormwater Management (Sec. 83-19 thru 83-32)
2. Chapter 90 – Subdivisions (90-1 thru 90-226)

[https://www.municode.com/library/al/dothan/codes/code\\_of\\_ordinances](https://www.municode.com/library/al/dothan/codes/code_of_ordinances)  
<https://adem.alabama.gov/programs/water/waterforms/LIDHandbook.pdf>  
<https://www.epa.gov/nps/urban-runoff-low-impact-development>

**Responsible Departments:** Public Works Department, Dothan Utilities, and Planning and Development Department.

**Measurable Goals:** The City will review the stormwater ordinance annually to determine if updates or changes are needed. Any changes to the stormwater ordinance will be reported in the annual report.

**BMP #2: Stormwater Projects:**

The City of Dothan performs multiple stormwater projects each year. These projects range from installing stormwater pipe to installing rip-rap to prevent erosion of existing ditches. The Public Works department maintains and updates a “Drainage Improvement” list that identifies and ranks areas within the MS4 where stormwater issues have occurred. The City will report all maintenance activities to the stormwater system each year in the annual report. Additionally, the City will report in the annual report any capital projects that are currently underway within the MS4 area.

**Measurable Goals:** Report completed projects and all maintenance completed in annual report.

**Responsible Departments:** Public Works Department

**BMP #3: Stormwater Detention Pond Inspection Requirement:**

Each year the City of Dothan inspects all detention ponds located within the City’s MS4 (see Appendix F: Post Detention Pond Inspections). During each inspection the inspector completes a “Detention Pond Inspection Form”, a blank form can be found in Appendix J. All issues identified will be documented on the previously stated form and the owner of the pond may be notified about the issue(s) with the pond if corrections are required. The following are examples of issues that will be noted on the inspection form.

- Erosion – Around Outlet Structure
- Erosion – On Pond Banks
- Collapsed Pipes

- Damaged Outlet Structure
- Overgrown Vegetation
- Excessive Trash or Debris

**Measurable Goals:** The City of Dothan will provide a list of all the detention ponds inspected each year. The City will report how many letters sent each year. The City will include a copy of the Detention Pond Inspection forms and list in the annual report.

**Responsible Departments:** Public Works Department

## **Pollution Prevention/Good Housekeeping for Municipal Operations**

### **Permit Requirements:**

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

Procedures shall be known for the proper disposal of waste removed from the MS4 and municipal operations, including materials such as dredge spoil, accumulated sediments, floatables and other debris.

All department heads/directors are responsible for pollution prevention/good housekeeping in each respective department. This is implemented through weekly or monthly staff meetings and training. The Public Works Department and the Planning and Development Department Code Enforcement Officer periodically monitor the Public Works facility and maintenance/shop areas, to ensure compliance with the City of Dothan IDDE program. Any inefficiencies are reported to the Department Director.

### **Targeted Pollutants and Sources:**

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

### **Strategies, Goals and Timelines:**

Pollution prevention includes measures that involve rights-of-way, including bridges, stormwater management systems, and roadways. Good housekeeping includes measures that involve City owned facilities.

**BMP #1: Bridge Inspections:** Dothan currently inspects some bridges for structural integrity, erosion and stream degradation, and debris.

**Measurable Goals:** Minor scour has been noted to exist on some bridges.

Corrective actions may be performed by the City Street Division if conditions warrant.

**Responsible Department:** Public Works

**BMP #2: Street Sweeping Operations:** The City of Dothan Public Works Department now owns 5 street sweepers. Streets are swept daily, removing sediment and debris from the roadways and storm drains.

**Measureable Goals:** The City will report the approximate tonnage of debris removed by street sweeping each year.

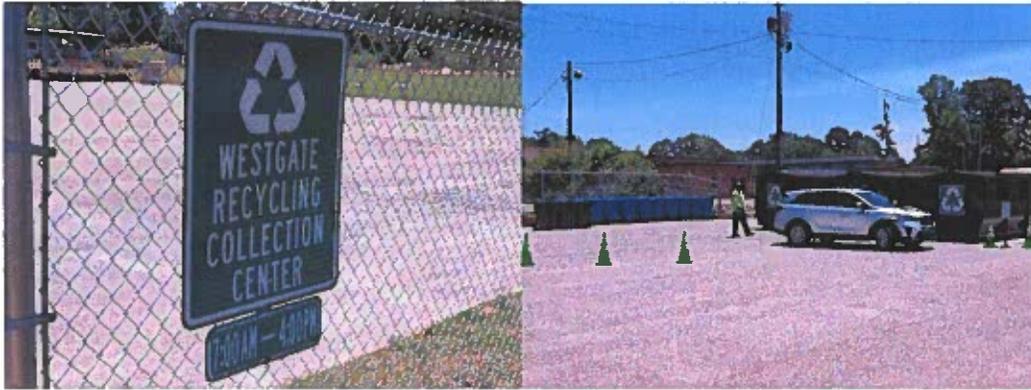
**Responsible Department:** Public Works

**BMP #3: City Recycling Program:** Since recycling programs reduce a potential pollutant source by reducing, recycling and reusing, they are a benefit to storm water management. The City of Dothan started its city wide curbside recycling pick-up program in June of 2013. The City reduced the number of drop off points in the 2018-19 year. Many sites had become dumps as they were unattended. The two drop off locations are listed below. The City also started a City of Dothan Environmental Services Facebook page to help get more information to the Public about the Recycling Program and changes.

Designated drop off points are:

1. Dothan Landfill  
1290 Burkett Road  
Dothan, AL 36303
2. Westgate Recycling Center  
2739 Choctaw St  
Dothan, AL 36303

The following pictures are examples of the City of Dothan's recycling centers and its commitment to recycling:



*Westgate Recycling Center*



*Dothan Landfill*



*Dothan Civic Center*

**Measurable Goals:** The City will track the quantity of recycled goods (comingled paper, plastic, and aluminum) sent to the recycler and report the data in the annual report.

**Responsible Department:** Public Works

**BMP #4: Stormwater Management System Maintenance:** The stormwater management system for the City contains grassed and concrete swales, culverts, inlets, pipes and detention structures. Currently structures are maintained on an as-needed basis by determination of the Public Works Department. Areas are also maintained when valid complaints of drainage problems are filed with the City and as found during inspections.

**Measurable Goals:** The City maintains a list of the ditches and/or pipes cleaned each year and will provide the data in the annual report.

**Responsible Departments:** Public Works and Dothan Utilities

**BMP #5: Litterbugs:** The City contracts with the Wiregrass Rehab Center to collect roadside trash and also clean up after certain events. This “Litterbugs” program has been ongoing for several years.

**Measurable Goals:** The City will continue the Litterbugs program and track areas patrolled and quantities of litter removed and reported and report the data in the annual report.

**Responsible Department:** Public Works

**BMP #6: Garbage Collection:** Public Works Department provides extra garbage dumpsters and receptacles at special events during the year such as Farmers Market (weekly during the summer), National Peanut Festival (yearly), Mardi Gras (yearly), and Christmas Downtown (yearly).

**Measurable Goals:** The City will report events where extra garbage receptacles were provided each year.

**Responsible Department:** Public Works

**BMP #7: Capital Stormwater Projects:** Each new fiscal year, the City determines a list of unfunded capital improvement projects. These projects are proposed to the City Commission and Mayor for approval. Some capital projects may be emergency repairs due to natural disasters. Emergency repair projects are funded and completed as soon as practicable for the safety of the public.

**Measurable Goals:** The City will report all capital improvement projects completed and/or in progress in the annual report.

**Responsible Departments:** City Commission, Mayor and Public Works.

**BMP #8: City Owned Facilities:** The City operates and maintains its facilities in a manner to minimize stormwater pollutant discharge to local waters.

**Measurable Goals:**

- a. **Inventory of Facilities:** The City has assembled a list of all City owned buildings including their addresses. Some of the buildings are grouped together on individual campuses to be addressed as a site.
- b. **Conduct dry weather screening of the Public Works and Dothan Utilities Complex** to ensure rinsing activities are in designated areas; recycle and drop off materials are properly managed and covered; ensure Public Works activities are not contributing to illicit discharges.

**BMP #9: Certified Pesticide Applicators:** Pesticide, herbicide and fertilizer application is overseen by certified applicators in Public Works, Leisure Services and General Services. Three employees within the City of Dothan are certified

through the State of Alabama Department of Agriculture and Industries as certified pesticide applicators. This specialized training ensures that pesticide, herbicide and fertilizer application on City property is done in accordance with manufacturer's recommendations in the most environmentally friendly method possible. All pesticide, herbicide, and fertilizers are locked and secured.

Applicator license (3 year) certifications include:

- a. Public Works – 1 Horticulturist
- b. Leisure Services – 3 Supervisors
- c. Dothan Utilities – 1 for easement maintenance

**Measureable Goals:** Maintain certifications

**BMP #10: Dedicated Wash Racks for Vehicles:** Employees in all departments within the City are instructed to wash vehicles and equipment only in designated areas which are connected to a proper treatment system.

All new car washes proposed within the City's MS4 area are required to wash vehicles over a sand trap which must be tied to the sanitary sewer system.

**Measureable Goals:** City departments will continue using dedicated wash racks for proper washing of vehicles and equipment. The Engineering Services division maintains a list of all car washes with sand traps that are tied to the sanitary sewer system.

**Responsible Departments:** Director or department head of each department. Public Works and Planning and Development for all proposed commercial carwashes.

**BMP #11: Training:**

Training is essential for all City employees regarding pollution prevention and good housekeeping. The City will provide training for the purpose of educating

employees regarding stormwater runoff and pollution prevention. This training may be a part of other MCM training.

**Measurable Goals:** The City will:

- a. Develop and provide training for new hires on Storm Water Pollution Prevention and Good Housekeeping; and,
- b. Develop and provide training for new employees with IDDE program responsibilities.

**Responsible Departments:** All City Departments.

**BMP #12: Monitoring and Reporting**

To date there are four (4) 303(d) listed waters located within the City of Dothan's MS4, Cooper Creek, Cypress Creek, Cedar Creek, and Limestone Creek. Cypress Creek was added to the 303(d) list in 1998 for nutrients and organic enrichments (CBOD and NBOD). Cedar Creek was added to the 303(d) list in 2008 for metals (mercury). Limestone Creek was added in 2018 for collection system failure and pasture grazing. Cooper Creek was added in 2020 for animal feeding operations and pasture grazing.

The City of Dothan has not been taking samples at Cedar Creek since the source of its impairment is atmospheric deposition.

City of Dothan has been taking quarterly samples at Cypress Creek to monitor the CBOD and NBOD. The City will monitor both Limestone and Cooper Creeks for E. coli semi-annually. See Appendix L for monitoring locations.

Additionally, Beaver Creek has two locations on the proposed 2022 303(d) list that will require E. Coli testing. The City will begin monitoring those areas after the 2022 list is adopted.

All stream monitoring reports from the previous year shall be submitted with the annual report. Any changes to the frequency of the monitoring shall be documented on the upcoming annual report. For the 303(d) stream monitoring and sampling procedures see Appendix I.

**Additional Monitoring:**

Any additional stream monitoring due to illicit discharges, or for any other reason, shall follow the same sampling procedure. If the samples are taken from the above referenced streams the data shall be incorporated with the monthly monitoring data.

All additional monitoring shall be reported on the upcoming annual report.

**Measurable Goals:** The City will include a copy of the monitoring reports in the annual report.

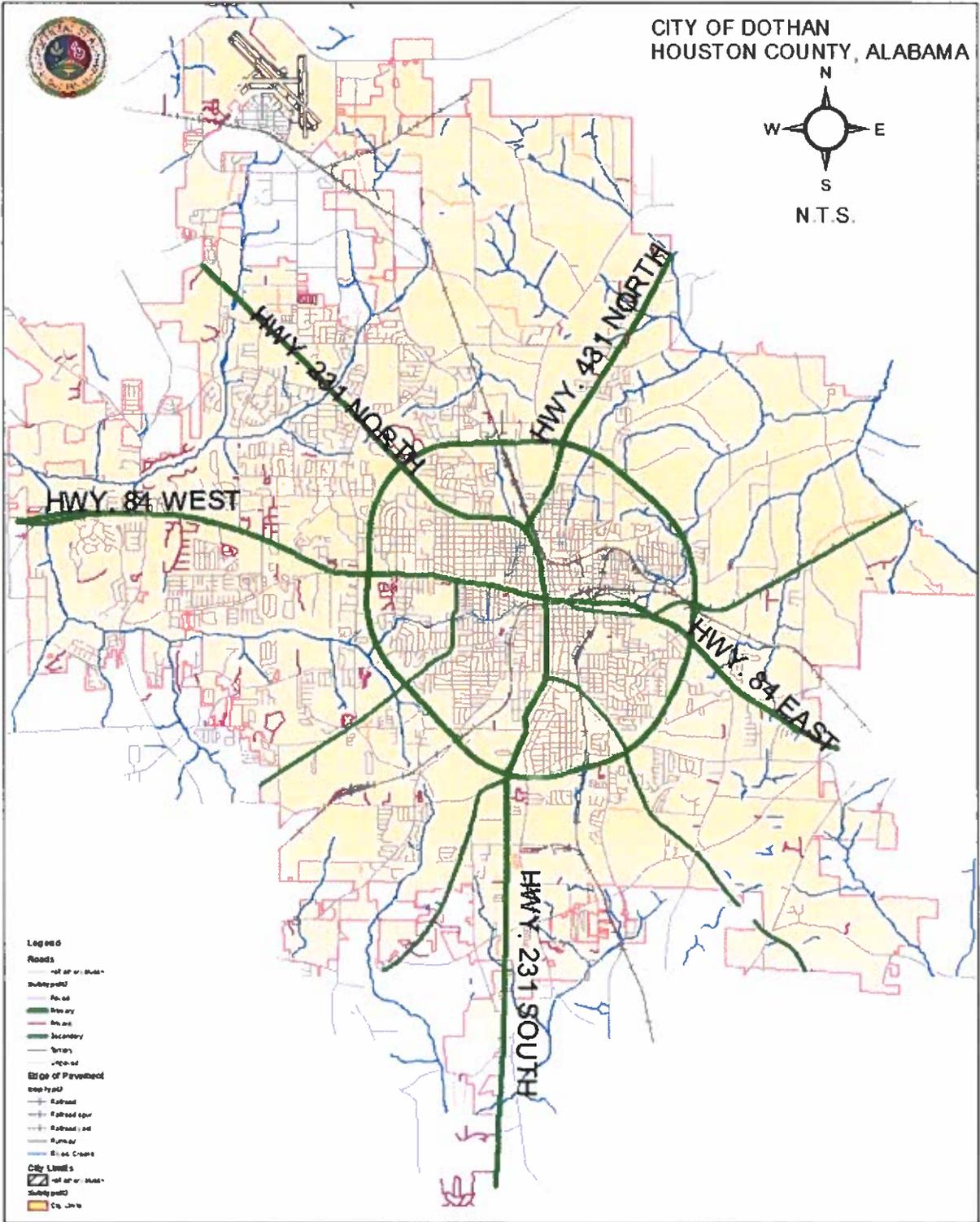
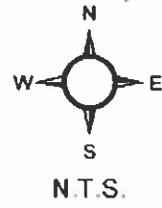
**Responsible Departments:** Public Works Department

# **SWMPP APPENDIX**

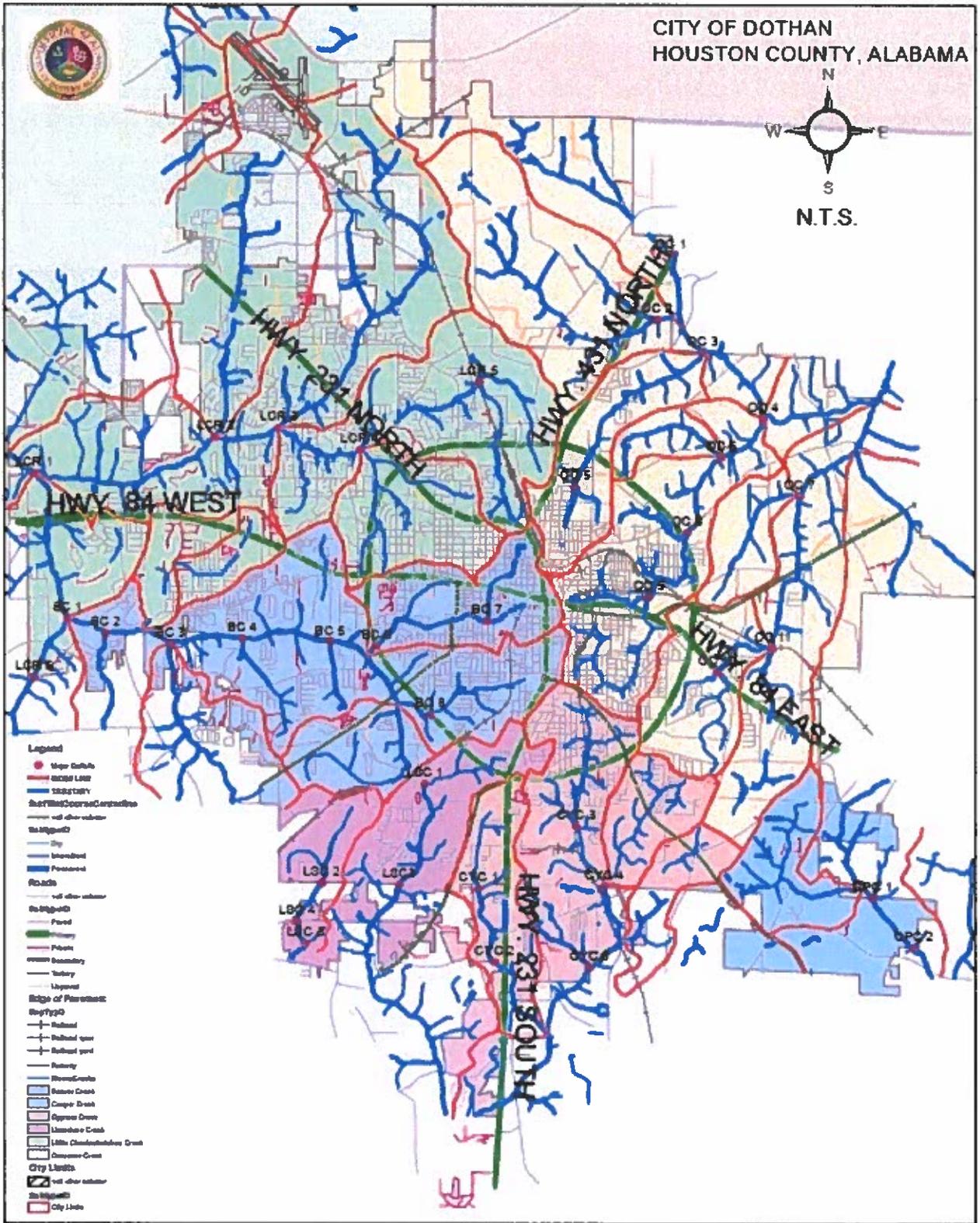
## Appendix A: City Map



CITY OF DOTHAN  
HOUSTON COUNTY, ALABAMA



## Appendix B: Dry Weather Monitoring Map



Appendix C: Dothan Fire Department Standard  
Operating Guide Hazardous Material Team and  
Responses

**DOTHAN FIRE DEPARTMENT  
STANDARD OPERATING GUIDELINE**

**OPERATIONAL GUIDELINE # 35**

**SUBJECT:** Hazardous Material Team and Responses

**DATE:** June 14, 2021

**PURPOSE:** In order to select qualified individuals, define training requirements, and establish response criteria for the Hazardous Materials Team.

**A. MINIMUM REQUIREMENTS FOR CONSIDERATION AS A NEW HAZMAT TEAM MEMBER**

**SECTION 1**

Basic entry qualifications are as follows:

1. Must be off probationary status.
2. Be currently certified as Firefighter II.
3. Must be willing to participate in not less than 40 hours of team training annually and be subject to emergency off duty call-in when properly notified.
4. Be currently certified as an Alabama Hazardous Materials Technician.

**B. TRAINING**

**SECTION 1**

Hazardous Materials Team members will maintain an Alabama Hazardous Materials Technician Certification.

**SECTION 2**

A minimum of 40 hours of team level training annually is required for every member. This training must be documented and recorded at the Training and Safety Division.

**SECTION 3**

All members must have and pass an annual medical examination as provided by the Dothan Fire Department.

**SECTION 4**

All members must be team qualified in the following areas:

- Defensive tactical operations
- Spill and leak control
- Decontamination
- Chemical protective equipment

- Detection and monitoring

### **SECTION 5**

Members are expected to attend advanced level training when provided by the Dothan Fire Department.

## **C. INCIDENT RESPONSE**

### **SECTION 1**

All members are subject to emergency off-duty, call-in when properly notified.

### **SECTION 2**

Off-duty members should respond to the staging area when notified and report to the Staging Officer. The Staging Officer will notify the Hazardous Materials Team Officer of resources in staging. All off-duty responding members must report with their structural firefighting PPE.

### **SECTION 3**

Following an incident, all Hazardous Materials Team members will report back to Station 2 to clean and secure equipment and to complete response records. All members will be released from duty by the appropriate Battalion Chief.

### **SECTION 4**

Under the authority of the Fire Chief, the Hazardous Materials Team provides response resources to hazardous materials incidents and potential releases in the City of Dothan and as a component of the Alabama Mutual Aid System (AMAS).

### **SECTION 5**

The Hazardous Materials Team will conduct contingency planning for responses to probable hazardous materials incidents in our city and region.

### **SECTION 6**

The Hazardous Materials Team will provide resources to isolate and deny entry to hazardous areas, determine evacuation needs, protect in place and coordinate with city, state, and federal agencies to provide resources and mitigation assistance.

### **SECTION 7**

The Hazardous Materials Team will conduct an Incident Action Plan and risk assessment in the following manner:

1. Evaluate the magnitude of the threat to the health and welfare of the public as well as to the environment.
2. Determine if response action by the responsible party(s) is adequate.
3. Collect the data necessary to formulate a tactical plan if an offensive operation is warranted.

### **SECTION 8**

The Hazardous Materials Team will contact the owner and/or operator of the source of the release, if known, to inform them of their potential liability for removal/cleanup costs and explain the team's role in hazardous materials mitigation while gathering information for response and safety purposes.

### **SECTION 9**

After conducting a risk assessment, the Hazardous Materials Team will carry out immediate mitigation objectives. Immediate mitigation will focus on developing the objectives necessary to stabilize the incident prior to the arrival of a cleanup contractor or responsible party.

### **SECTION 10**

The Hazardous Materials Team will monitor cleanup operations of the responsible party. If no owner and/or operator can be found the Houston County EMA must be notified to negotiate the cleanup. The Hazardous Materials Team is not expected to be capable of designing and/or implementing a complex cleanup plan, however, the team shall ensure that response workers and the public are adequately protected.

## **D. LEVEL OF RESPONSE CAPABILITY**

### **SECTION 1**

The Hazardous Materials Team shall maintain proficiency consistent with NFPA 472 and 473, as well as CFR Title 29 1910.120. This will include technician competencies for Totally Encapsulating Chemical Protection (TECP).

### **SECTION 2**

When sufficient entry level personnel are not available due to inadequate personnel/equipment resources, the team shall request additional personnel and adopt a defensive mode until staffing requirements are achieved. Specifically, members shall perform non-entry (defensive) responsibilities until hazmat trained personnel arrive.

## **E. MISSION STRATEGIES**

### **SECTION 1**

The mission strategies of the Dothan Fire Department include:

1. Readiness - which includes training and contingency planning
2. Response - which includes all functions that lead to incident stabilization
3. Recovery – which includes overseeing cleanup to protect the public and environment

## **SECTION 2**

A site assessment is necessary to determine the extent and/or effects of a release or a potential release. An effective site assessment may require personnel to work in or near the area of release in order to gather information regarding the nature of material(s) and the potential impact to citizens, property, and the environment.

## **SECTION 3**

Response activities will always be conducted by team personnel who are properly trained and equipped. In addition, the development of a site safety plan will precede these activities.

## **F. INCIDENT LEVELS**

### **SECTION 1**

Hazardous Materials incidents vary greatly in their magnitude and degree of hazard. Because of this, it is necessary for the Incident Commander to be able to evaluate the level of the hazard involved. Resource requirements are determined based on the hazard type and the level of release/probable release. The following guidelines classify hazardous materials incidents into two levels of complexity and resource commitment. By reporting the level of the incident, the Incident Commander can inform the Communications Center, as well as responding companies, as to the initial size-up and projected resource requirements.

### **SECTION 2**

All incidents involving the release of a hazardous material shall be reported to the Communications Center using the following terminology:

- 1. Level I Incident** - a release that can be controlled by one Engine Company. Examples include minor liquid fuel leaks/spills, investigation of odors, and minor natural gas leaks. Level I incidents may require simple product identification or verification, and limited spill/leak intervention. The Incident Commander may elect to consult the team for technical advice either by radio or telephone.
- 2. Level II Incident** - a release that requires the response of the Hazardous Materials Team (Hazmat 2 and Engine 6). This type of release may involve substantial quantities of common liquid fuels or smaller quantities of extremely hazardous substances (EHS). This level may require the recall of off duty Hazmat Technicians. The proper agencies should be notified if a reportable quantity has been spilled.

## **G. SCOPE OF OPERATIONS**

### **SECTION 1**

If it is safe to do so, the Company Officer must detect the presence and identify the type of material involved and any other hazards present.

## SECTION 2

The Company Officer should isolate and secure the incident area in as safe a manner as possible to prevent accidental exposure to an immediate hazardous situation. A physical barrier, such as fire line tape should be used to mark off the "hot" or danger zone. A starting distance of at least 200' in all directions should be the minimum exclusionary zone until specific information about evacuation zones can be referenced.

## SECTION 3

The Company Officer must evacuate the areas that may be exposed to hazardous materials to protect life.

## SECTION 4

The Company Officer should limit the spread of hazardous materials spills to the smallest possible area without further exposure by controlling or stopping the leak/release of product while ensuring minimal risk for personnel.

## SECTION 5

Prior to arrival the responding units must request wind direction and speed from Communications. This will enable the first arriving officer to determine a suitable route for **approaching the incident upwind and upgrade**. Once this is determined, the officer must advise over the radio the route for all units to approach and stage.

## SECTION 6

**Isolate** the immediate area and deny entry of all non-essential personnel to the area of the suspected hazardous material incident.

## SECTION 7

Establish a **"hot zone"** and restrict personnel from coming in contact with hazardous vapors, liquids, or solids.

## SECTION 8

Make all attempts to identify the hazardous material and reference the chemical hazards and properties of the material **before taking action or exposing personnel to a possible hazardous environment**. Information that must be obtained includes:

1. Dispatch information (wind speed, direction, specific chemical information)
2. Information from property owners, business managers, vehicle drivers, plant operators, industry safety personnel, etc.
3. Information from witnesses
4. Visually inspect to see if signs of exposure have occurred (victims, animals, vegetation, clouds, steam, etc.)
5. Attempt to locate DOT or NFPA placards and/or labels
6. Obtain Shipping papers or other chemical identifying documents (i.e. non-contaminated product labels, Material Safety Data Sheets)

7. Evaluate container shape and size while determining if the container is stressed or breached
8. Look for the presence of an unidentified material: gas or vapor, liquid leak or spill, solid particle spill

### SECTION 9

If there is a leak or release of a suspected hazardous material, the following information must be determined:

1. Size of the spill
2. Size of the vapor cloud
3. Amount and/or potential amount of release
4. Direction and rate of spill or vapor cloud travel
5. Life exposures and property exposures to the suspected hazardous material

### SECTION 10

When there is a release of a known or unknown material and there are indications that the product may be a hazardous material, the following actions should be taken:

1. Isolate the area
2. Deny entry of all unauthorized personnel
3. Dispatch the appropriate Battalion Chief
4. Dispatch the Hazardous Materials Team
5. Refer to the DOT Emergency Response Guide and follow the instructions (For unknown materials use Guide #11)
6. Determine the need to evacuate and request assistance from PD if needed.
7. Eliminate ignition sources
8. Contain the spill and/or control the runoff if it can be accomplished **exposing personnel to the hazardous material** (solid, liquid, or vapor).
9. Rescue the injured, **only** if it is a life threatening situation. Do not enter the "Hot Zone" and avoid chemical contact if the life of the rescuer is at risk.
10. Develop a rescue/EMS plan
11. Conduct risk/benefit and determine risk to personnel
12. Establish a decontamination area ("warm zone")
13. Isolate exposed victims and personnel in an emergency decontamination area
14. Perform patient care

### SECTION 11

Once it is determined that a Hazardous Material event has occurred, the Incident Commander must assign the qualified members to serve as the Hazardous Material Operations Officer and the Incident Safety Officer.

### SECTION 12

When identifying the product or establishing "Operational Zones", the minimum PPE shall be full structural firefighting protective clothing and positive pressure

self-contained breathing apparatus. As soon as it is determined that more protection is required, the Incident Commander must establish the new PPE requirements.

## **H. CLEAN UP AND DISPOSAL OPERATIONS**

### **SECTION 1**

When the hazardous material spill or release is contained and the hazards to life and property are controlled, clean up, disposal, and long range environmental protection are the next major concerns. The property owner, the waste generator, or the waste shipper is responsible for the safe and proper clean up of the incident site.

## **I. NOTIFICATIONS FOR HAZARDOUS SPILL/RELEASE LOCATIONS**

### **SECTION 1**

The Incident Commander will advise the property owner or manager that it is their responsibility to properly clean up the hazardous waste and make the site safe. If the property owner/manager will not or cannot accept this responsibility, the following responsible individuals will be notified of the incident and situation status:

1. Fire Chief
2. City Manager
3. Police Chief
4. City Attorney
5. Health Department Director

## **J. HAZARDOUS MATERIALS RESPONSES**

### **SECTION 1**

The Hazardous Materials Team will respond for all Hazmat Level II when any of the following occur:

- Report of chemical or hazardous material leak or spill
- Transportation emergencies involving hazardous materials
- Flammable/combustible liquid spills over 10 gallons
- Fires involving chemicals or hazardous materials
- Emergency medical incidents when people are exposed to poisons, radioactive material, or corrosives (incidents requiring Hazardous Materials Decontamination)
- Any rescue involving a Trench or Confined Space emergency.

## SECTION 2

The Hazardous Materials Team will be activated by:

- The Communications Center upon the receipt of a Hazmat Level II
- Upon the request of a company or chief officer
- Upon the request of the Incident Commander at incidents involving hazardous material(s)

## SECTION 3

The standard Hazardous Materials Level II response will be:

- Two Paramedic Engine Companies
- One Battalion Chief
- One Hazmat Two
- One Ambulance
- One Police Officer
- Duty Officer

Note: The Incident Commander will be responsible for notifying the Hazardous Materials Team Commander and the Fire Chief.

## SECTION 4

The procedure for off-duty Hazardous Materials Team activation will be:

- The Battalion Chief or Fire Chief must authorize the activation of the off-duty Hazardous Materials Team.
- Communications will activate the Hazardous Materials Team by **Fire “All Call”** and include the following alarm information:
  - Address
  - Type of Alarm
  - Staging Area
  - Name of Command
- After three minutes of the initial alarm, Communications will send out another message via **Fire “All Call”** and re-announce the Hazmat alarm.

## SECTION 5

The response of the Hazmat Unit and Hazardous Materials Team will be as follows:

- On-duty Hazardous Materials Team members at Station 2 will respond on Hazmat 2.
- The Battalion Chief will make arrangements for on-duty Hazardous Materials Team members not at Station 2 to respond to the incident.
- If there are no on-duty Hazardous Materials Team members available, one fire fighter will be assigned to drive the Hazmat Unit to the incident.

**Note: Hazardous Material chemical protective clothing and other specialized equipment shall be used by Hazardous Materials Team members only.**

- When notified, off-duty Hazardous Materials Team members shall respond to the incident staging area and report to the Staging Officer. Reporting members must report with their structural fire-fighting gear.
- The Incident Commander shall designate and announce to Communications the staging area in the “Cold Zone” as soon as possible. Communications will re-announce the incident staging area for the off-duty responding Hazardous Materials Team members. This information will be included in the activation (call back) page.

#### **SECTION 6**

If the Hazardous Materials Team is cancelled, Communications will activate the Hazardous Materials Team group page and inform them to cancel response. This will be repeated after three minutes.

\_\_\_\_\_  
(Signed Copy on File)  
Larry H. Williams, Jr.  
Fire Chief  
DOTHAN FIRE DEPARTMENT

## Appendix D: Development Review (SOP)

# City of Dothan



## **Standard Operating Procedure (SOP) Commercial Development Review – Engineering Services**

For commercial development submittals, stormwater drainage is reviewed for compliance with the City of Dothan Stormwater Ordinance in the Construction Plans review. Design review is performed independently by various City of Dothan Department representatives. The Public Works Department is the representative for Stormwater reviews. The applicant's engineer is the person ultimately responsible for drainage compliance with the City's regulations.

### **Development Review**

Commercial buildings larger than 15,000 S.F. or commercial developments adjacent to residential development are required to be presented and approved by the City of Dothan Planning Commission. Other commercial development or substantial re-development requires an in house review. After the City of Dothan's Planning Commission has approved a commercial development and/or the internal review process has been completed developers/applicants may submit construction plans to the permits office (*Note: in some case the developer/applicant may submit constructions drawings prior to or at the time the development plans are submitted*). At this time the permits office sends an email notice to all departments required to sign off on commercial construction plans. The following steps are taken when reviewing commercial developments for stormwater management.

#### **Step 1: Stormwater Runoff Control**

- Identify the location of the proposed commercial development and any existing stormwater elements (drainage patterns, detention/retention pond).
  - If there is an existing detention/retention pond, review existing stormwater calculations and determine if the stormwater runoff from the new development was accounted for in the previous stormwater detention/retention design. If so, have the developer's engineer submit supporting information.
  - If there is no existing drainage elements require the developer's engineer to submit a drainage plan that meets the requirements of the City of Dothan's Stormwater Ordinance.
  - All developments shall be analyzed for the 24 hour, 2, 10, and 25 year storm events. Additionally, if proposed development is adjacent to and uphill from a residential or commercial property, require an analysis of the detention pond for the 24 hour, 1% annual chance storm event and possibly detain such on case by case basis.

#### **Step 2: Flood Plain**

- Determine which flood zone the proposed commercial development is located in.
  - If it is located within Flood Zone "A" or "AE" all permitting requirements for developing within the Special Flood Hazard Area (SFHA) are required.

- If the development is not located within Flood Zone “A” or “AE” no additional permitting is required.

### **Step 3: Sanitary Sewer**

- Determine if the location of the sanitary sewer shown in the plans is accurate according to the City’s current records. The City does not provide nor guarantee the elevation of the sanitary sewer mains. That information must be determined by the developer’s engineers.
- If there is any work done on the public sanitary sewer system additional information is required such as profiles, as-built, maintenance bonds etc.
- The City of Dothan does require information regarding sanitary sewer flows.
  - If there is a new connection to the sanitary sewer system or additional sanitary sewer flows are anticipated from the proposed development or re-development, sanitary sewer flows are required.
  - If there is not a new sanitary sewer connection and no additional flows are expected, a letter stating this and supporting information is required.

### **Step 4: Erosion Control Measures**

- All land disturbance activities requires an erosion control plan that meets the current Stormwater Ordinance.
  - If more than one (1) acre of land is disturbed, an NPDES permit is required by ADEM. The City requires a copy of the NPDES permit and all inspection reports.

Once the proposed commercial plans have been reviewed according to this procedure, comments are generated and submitted to the planning department. All developments can be unique and may require additional comments and/or information if it has effects on the City of Dothan’s Storm and Sanitary Sewer Systems.

### **Permitting Review**

Once all required and requested information has been received and reviewed for compliance with the City of Dothan’s Stormwater Ordinance, as well as the comments submitted in the development review and is acceptable, the construction permit will be approved as it pertains to Engineering Services. If information is missing and/or additional information is required to determine if the plans meet the ordinance, contact the engineer, owner, or developer to request information and/or resolve other problems with the submitted information and/or plans.

# City of Dothan



## **Standard Operating Procedure (SOP) Residential/Commercial Subdivision Development Review – Engineering Services**

For residential/commercial subdivision development submittals, a preliminary plat is submitted to the planning commission for an overall layout review by all departments. If the preliminary plat is approved by the planning commission, construction plans are submitted for review. The stormwater drainage is reviewed for compliance with the City of Dothan Stormwater Ordinance in the Construction Plans review. Design review is performed independently by various City of Dothan Department representatives. The Public Works Department is the representative for Stormwater reviews. The applicant's engineer is the person ultimately responsible for drainage compliance with the City's regulations.

### **Construction Plan Review**

Residential subdivision plans are submitted to the City of Dothan Planning Department. They are then delivered to Engineering Services. Engineering Services is responsible for notifying outside representatives such as the state, county, and utility providers that construction plans have been submitted for review for a proposed subdivision. The following steps shall be performed when reviewing residential/commercial subdivisions:

#### **Step 1: Stormwater Runoff Control**

- Identify the location of the proposed residential/commercial development and any existing stormwater elements (drainage patterns, detention/retention pond).
  - If there is an existing detention/retention pond, review existing stormwater calculations and determine if the stormwater runoff from the new development was accounted for in the previous stormwater detention/retention design. If so, have the developer's engineer submit supporting information.
  - If there are no existing drainage elements, require the developer's engineer to submit a drainage plan that meets the requirements of the City of Dothan's Stormwater Ordinance.
  - All developments shall be analyzed for the 24 hour, 2, 10, and 25 year storm events. Additionally, an analysis of the detention pond for the 24 hour, 1% annual chance storm event and possibly detain such on case by case basis.
  - Review development to limit the possibilities of stormwater issues once the lots/parcels are developed.

## **Step 2: Flood Plain**

- Determine which flood zone the proposed residential/commercial development is located in.
  - If it is located within Flood Zone “A” or “AE” all permitting requirements for developing within the Special Flood Hazard Area (SFHA) are required.
  - If the development is not located within Flood Zone “A” or “AE” no additional permitting is required.
  - Some lots may require setting a minimum finish floor if the development is within the flood plain or near a natural drainage way with known stormwater problems.

## **Step 3: Sanitary Sewer**

- Determine if the location of the sanitary sewer shown in the plans is accurate according to the City’s current records. The City does not provide nor guarantee the elevation of the sanitary sewer mains. That information must be determined by the developer’s engineers.
- All work done on the sanitary sewer system will require information such as profiles, as-built, maintenance bonds etc. Verify minimum separation requirements at crossing with the stormwater system.
- The City of Dothan does require information regarding sanitary sewer flows.
  - If there is a new connection to the sanitary sewer system or additional sanitary sewer flows are anticipated from the proposed development or re-development, sanitary sewer flows are required to be submitted.
  - If there is not a new sanitary sewer connection and no additional flows are expected, a letter stating this and supporting information is required.

## **Step 4: Erosion Control Measures**

- All land disturbance activities require an erosion control plan that meet the current Stormwater Ordinance.
  - If more than one (1) acre of land is disturbed, an NPDES permit is required by ADEM. The City requires a copy of the NPDES permit and all inspection reports.

## **Step 5: Easement Requirements**

- Identify any location that will require any type of easement whether the easement be public or private, all easements shall be shown on construction plans and then recorded on the final plat.

Once the proposed residential/commercial plans have been reviewed according to this procedure, comments are generated and submitted to the planning department. All developments are unique and may require additional comments and/or information if it has effects on the City of Dothan’s Storm and Sanitary Sewer Systems.

Once all required information has been received and reviewed for compliance with the City of Dothan's Stormwater Ordinance, and is acceptable from all departments, the construction plans will be approved. If information is missing and/or additional information is required to determine if the plans meet the ordinance, contact the engineer, owner, or developer to request information and/or resolve other problems with the submitted information and/or plans.

## Appendix E: Construction Site Inspection (SOP)

# City of Dothan



## **Standard Operating Procedure (SOP) Construction Site Inspection – Engineering Services**

City of Dothan Public Works and Planning and Development Departments have certified QCI Inspectors to conduct BMP inspections, as well as other inspections. The initial BMP inspection is performed prior to other construction inspections. The Building Inspectors assist with BMP inspections by ensuring compliance with each building inspection. The developer's or engineer's QCP Inspectors usually perform the closure BMP inspection, as part of the final inspection on the site. The City of Dothan Stormwater ordinance is successful at minimizing sedimentation and erosion to the maximum extent practical. Construction sites with high impact potential and subdivisions under construction are inspected frequently. Construction sites with high impact potential include multi-family, non-residential, those near critical areas or those disturbing more than an acre. Other single family home construction sites are inspected initially and with follow up inspections by building inspectors to ensure continued compliance.

### **Initial BMP Inspection**

- Require a copy of the developer's NOI and BMPs
- Review the Erosion Control Plan and BMPs submitted with the construction plans that were approved.
- Make sure that all required BMPs are in place as required by permit prior to and/or during any land disturbance activities.
- Investigate the site to look for any possible areas that may need additional erosion control BMPs.

### **Intermediate Inspections**

- Determine if any silt has left the site. If silt has left the site document the location and contact the person in charge of the site.
- Inspect all BMPs and determine if they have been properly implemented and maintained. If not document the location of the BMP, the BMP's deficiency, and contact the person in charge of the site.
- Determine if additional BMPs are needed to prevent silt from leaving the site.
- Identify any BMPs required by erosion control plan that are not in place at the time of the inspection.
- Fill out Monthly Building Permit Stormwater Inspection form.

### **Final Inspection**

- Have all temporary BMPs been removed from the construction site.

- Are all permanent BMPs present and installed correctly.
- Make sure all disturbed areas have been seeded and hayed or sodded? Additionally make sure all slopes have been stabilized.
- Make sure all trash has been removed from the site.

## Appendix F: Post Detention Pond Inspections (SOP)

# City of Dothan



## **Standard Operating Procedure (SOP) Post – Detention Pond Inspections – Engineering Services**

Engineering Services inspects all public and private detention/retention ponds within the City of Dothan’s MS4 area on an annual basis. The following procedure should be used at a minimum to determine if the detention ponds are operating adequately.

### **Detention Pond Inspection**

- Inspect the outlet/control structure in the detention pond and determine if it is working properly.
- Check for any signs of erosion in or around the detention pond. If there are signs of erosion, determine the extent and check to see if any sediment is leaving the pond.
- Determine if the detention pond is overgrown with vegetation to the point it is creating a change in the ponds functioning. If yes, contact owner and make sure that there is a routine maintenance plan for the detention pond and that the problem is remedied.
- Check for any litter or trash in or around the detention pond. Check outlet structure and make sure there is no trash/debris in or around outlet structure.
- Check for any grass/vegetation clippings or debris in or around the detention pond.
- Check for and note any additional problems that would prevent the detention pond from operating properly.
- Complete Detention Pond Inspection form.

## Appendix G: Dry Weather Screening (SOP)

# City of Dothan



## **Standard Operating Procedure (SOP) Dry Weather Screening – Public Works Department**

City of Dothan Public Works department inspects/screens fifteen (15) percent of all known major stormwater outfalls within the MS4 area on an annual basis. Within five (5) years of the initial screening all known outfalls shall be inspected. The following procedure should be used at a minimum to determine if there are any non-stormwater discharges within the MS4.

### **Outfall Inspection**

1. Do not inspect any outfall during or within three (3) days of any rain event.
2. Safely enter the location of the outfall. If this is the first inspection of the outfall and it cannot be accessed safely, find the nearest location (upstream or downstream) where the drainage ditch can be accessed safely. Document this change in location on the dry weather screening report.
3. Take a picture of the outfall
4. Complete Dry Weather Screening Form
5. If there is any trace of an illicit discharge, follow signs upstream to the source if possible (take pictures along the way). If it is not possible to find the source, try to determine the source based on the illicit discharge.
6. Monitoring samples may be required to determine if the illicit discharge is dangerous.
7. If the source cannot be determined, document, contact Engineering Services, and increase the screening frequency.
8. If the source is found, notify the owner/contractor/renter and engineering services.
9. Continue follow up inspections at this location until the illicit discharge is eliminated.

## Appendix H: Facility Housekeeping (SOP)

# City of Dothan



## **Standard Operating Procedure (SOP) Pollution Prevention/Good Housekeeping**

City of Dothan, Public Work's department inspects City owned facilities that have the potential to create an illicit discharge to the MS4. Each of these designated facilities will be inspected each year. The following procedure should be used at a minimum to determine if there are any illicit discharges.

### **City Facility Inspection**

1. Determine the type of facility (maintenance, washing, storage, fueling, etc.)
2. Locate areas which have a potential to create an illicit discharge (fuel pumps, fuel tanks, storage containers, used oil containers, vehicle storage areas, outdoor material storage, etc.).
3. Complete the City of Dothan checklist for the facility being inspected. If an item is in compliance check "Yes", If an item/location is not in compliance check "No". If the item does not apply check "N/A".
4. If "No" is checked:
  - Take pictures of the possible illicit discharge
  - Document location and specify the item that is out of compliance
  - Notify supervisor
5. The supervisor shall contact the Department Head or Division Manager and develop a plan to resolve the issue.
6. Once the issue is resolved the facility shall have a follow-up inspection, repeating the previous steps.

Appendix I: 303(d) Stream Monitoring and Sampling  
Procedure (SOP)

**DOTHAN UTILITIES**  
**303 (D) STREAM MONITORING AND SAMPLING PROCEDURE**  
**FOR CYPRESS AND BEAVER CREEKS**

**March 14, 2012**  
**Updated June 6, 2013**

Sampling according to consistent and good techniques is a requirement of Dothan Utilities. By sampling according to set procedures, this reduces the chance of errors associated with these duties and increases the accuracy of the sample results. This document includes a written 303 (d) stream sampling procedure for monitoring of the 303 (d) impaired waters in Alabama which include both Cypress and Beaver Creeks. The City of Dothan's municipal storm water systems (MS4) discharge into these 303 (d) impaired waters. The City has been directed by ADEM to begin monitoring these waters to establish a baseline of readings to be used for determination of a Total Maximum Daily Load (TMDL).

This procedure covers a stream monitoring and sampling procedure, as well as a Chain of Custody (COC) form and a COC error procedure. The following laboratory test parameters shall be conducted on collected samples: CBOD, BOD and TKN. In addition, the following field test parameters shall be conducted: pH, dissolved oxygen (D.O.) and temperature. The sampling frequency shall be once per month on the first Wednesday of the month. Two (2) sampling locations for Beaver Creek and two (2) sampling locations for Cypress Creek are identified in the maps provided as Attachment 1 to this procedure.

The Wastewater Treatment Supervisor is responsible for coordinating these efforts. The Wastewater Treatment Supervisor or appointed personnel shall forward lab reports to the Engineering Services Civil Engineer and provide a copy to the Water Operations Superintendent immediately following completion of testing.

### **Formulating the Objectives of the Sampling Program**

#### **I. Sample Type Used**

- 1. Grab Sample-** A grab sample is a single sample collected at a specific time. It is representative of the composition of a material (in this case stream water) being sampled only at that particular moment and place.

#### **II. To Fulfill Regulatory Sampling Requirements for 303 d Stream Monitoring**

- 1. Sample Collection Training-** The Wastewater Treatment Supervisor and all WWTP Chief Operators shall periodically review the sampling procedures with wastewater treatment personnel assigned to 303 (d) stream monitoring duties with sign-off and provide training to transferred or temporary personnel prior to being assigned to these duties.
- 2. Collecting Samples-** Properly collect all compliance samples in accordance with the most recent edition of Standard Methods for Analysis of Water and Wastewater. Refer to section III for the procedure.

3. **Records-** An accurate record of all sampling events shall be maintained. The Chain of Custody (COC), provided in Attachment 1, shall be accurately completed and checked thoroughly for errors by the personnel collecting the samples. All entries shall be in black ink, legible, and shall utilize the Dothan Utilities policy for handwriting numbers. All COC forms shall be scanned and placed on Dothan Utilities Server by the Wastewater Treatment Supervisor or appointed personnel.

### **III. Compliance Sampling**

1. **Collecting Samples-** The key objective of this procedure is to obtain a representative sample, as required by Standard Methods for Analysis of Water and Wastewater.

- A. **Grab Samples-** The first step is to gather all the needed sampling equipment and supplies. The following items, instrumentation and equipment will be required:

- Clean ½ gallon jugs and lids from the contract lab for each sample (Total of 4)
- Sample bottles from the contract lab for TKN samples (Total of 4)
- A black ink pen
- A magic marker
- A site specific chain-of-custody (COC) for each sample location
- Powder free latex gloves
- A clean ice chest approximately half full of ice
- A properly calibrated model 52 YSI dissolved oxygen meter
- A properly calibrated Accumet model AP62 portable pH meter
- A garbage bag for refuse such as used ties, gloves, etc
- A safety vest for each person (Total of 2)
- Safety glasses for each person (Total of 2 pairs)
- Two or more safety cones
- A 140 ml beaker or one of similar capacity
- Paper towels
- A full dispensing bottle of distilled water (to be used to rinse the D.O. & pH probes
- Sample pail with about 20 feet of attached rope

The Wastewater Treatment Supervisor shall provide notification and shall coordinate and appoint personnel to conduct any 303 (d) sampling events.

The instruments (pH and D.O. meter) shall be operated and calibrated according to manufacturer's recommendations. These calibrations are to be completed at the WWTP, immediately prior to initiation of the sampling event. Be certain to fill out the pH and D.O. calibration portions of the COC. Before using the pH calibration buffers, ensure they have not exceeded their expiration date. Samples collected shall comply with preservation, transportation, and holding time recommendations cited in the most recent edition of Standard Methods for the Examination of Water and Wastewater and described herein.

Using a magic marker, properly mark all the ½-gallon sample collection jugs with the sample location, sample date, and test parameters CBOD and BOD. Note that no preservatives are to be used for CBOD and BOD samples. Using a magic marker, properly mark all the 500 mL sample bottles with sample location, sample date, and test parameter TKN. Note that the TKN sample bottles are to be obtained from the contract laboratory and shall include a sample preservative. All of the collected samples will be placed in ice.

**Two people are required for this sampling event.** Check the updated weather forecast for your area prior to initiating the sampling event. Do not attempt to sample during thunderstorms or other severe weather.

The sample should be representative of the stream source sampled. Taking samples very close to the bank or at the water's surface are not be representative to the source. The sample shall be collected at a depth approximately half-way between the surface and the bottom of the source water (i.e. mid stream). This 303 (d) sampling is to be accomplished from or near the bridge (if present) over each sampling location. **A MAP IDENTIFYING EACH SAMPLING LOCATION IS PROVIDED AS ATTACHMENT 1 TO THIS PROCEDURE.**

While observing all safe traffic rules, park off the roadway in close proximity to the sampling location. Turn on the emergency flashers and leave them on during the duration of the sampling event. Always keeping traffic safety in mind, carefully exit the vehicle and while in a safe location away from the traffic, each participant shall put on a safety vest if they aren't already wearing one. Next, put on a pair of powder free latex gloves and safety glasses. These are to be worn during the duration of the sampling event. One person will primarily be an assistant, observing and directing traffic as necessary. Proceed to properly place safety cones around the work area at all locations when parked near the roadway. This is done in order to create a visible working safety zone to oncoming adjacent traffic.

Carefully maneuver into place to collect the sample. Using the sampling bucket and rope, lower the bucket into the water and collect the sample, while avoiding disturbing the bottom sediment. Raise the bucket containing the sample and quickly fill the previously labeled ½-gallon sample jug and 500 mL sample bottle. Secure a lid on the jug and bottle.

Next, obtain the source water's dissolved oxygen (D.O.) and temperature using the previously calibrated YSI Model 52 D.O. meter and following the manufacturer's recommendations. This will be a direct measurement taken at the same location and depth as the grab sample just collected. Take note of this information and place it on the COC in the appropriate "sample field parameter" section. The person conducting these field parameters shall initial by each of the result entries on the COC and record the date and time of these measurements. Since both the D.O. and temperature readings occurred at the same time, these recorded times should be the same.

Now carefully exit the sampling location and remove the safety cones.

Proceed back to the truck and place the safety cones whereas to create a visible working safety zone to oncoming adjacent traffic.

Now making certain that the lid is tight on the ½-gallon sample jug, shake (agitate) the sample to obtain a homogenous mixture. Remove the lid and quickly pour about 100 milliliters (ml) into the 140 ml beaker. Rinse the beaker with this portion. Repeat the agitation steps as previously described and pour about 100 milliliters of sample into the previously rinsed beaker. Obtain the pH of this sample using the calibrated Accumet AP62 portable pH meter and following the manufacturer's sample measurement recommendations. Make certain that the sample beaker is being slightly agitated in a circular motion, whereas to move the sample past the probe's membrane. When a stable reading is obtained, place it on the COC in the appropriate "Sample Field Parameters" section and initial in the provided space. Fill out the remaining pH COC data noting the collection date and time, as well as the analysis date and time. **Assure this pH measurement does not exceed the EPA regulatory requirement of a maximum of fifteen (15) minutes from time of collection and analysis time.** Pour out the pH sample when measurement is complete. Alternately, the pH may be taken using the remaining water in the sampling bucket.

Securely place the lid back on the sample jug and place the sample jug and sample bottle into a clean ice chest which is approximately one half-full of ice. Next, accurately fill out the remainder of the chain of custody (COC) for this sample. Check the COC thoroughly for errors or omissions. Place all the sampling equipment back into the truck. Being mindful of traffic, carefully retrieve the safety cones and place them back into the truck bed.

Proceed to each of the remaining sampling points, collecting a sample and conducting the field parameters as previously described.

**B. Personnel Safety-** Personnel collecting any environmental samples should take precautions to minimize contact with pathogens and pollutants that may be present. Powder free latex gloves shall be worn to prevent direct contact. An antiseptic instant hand sanitizer may be used in the field. Proper personal hygiene is important. Do not eat, drink, or smoke during the actual sample collection. Be sure your hands are washed before partaking in any of these activities.

**C. Custody and Proper Sample Documentation-** Documentation includes clearly marking (using a magic marker) the sample collection container as previously described. All entries to the COC shall be made using a black ink pen. In addition, proper documentation includes an accurate chain-of-custody (as described in IV) record that documents the transfer of the sample from person-to-person. Sample custody shall be maintained from sample collection through laboratory analysis. Upon arrival at the contract lab, samples should be refrigerated at less than or equal to 6 degrees Celsius but not freezing in order to meet the EPA temperature preservation requirement for the test parameters to be conducted.

**D. Sample Delivery-** The sample shall be delivered to the contract lab as soon as sampling is completed. Upon arrival at the contract lab, the sample custody will be relinquished to the lab personnel. If lab personnel are not available to receive custody of the sample, it should be refrigerated and custody maintained until lab personnel are present to receive custody of the sample. The sample custody will then be relinquished to the lab. In the event it is anticipated the sampling personnel will not be present to relinquish custody to the lab, custody should be relinquished to the Wastewater Treatment Supervisor or the operator-in-charge that will be present to make the custody transfer. **Custody will always be maintained and a sample shall not be relinquished if no one is available to receive it.**

#### **IV. Chain of Custody (COC) Form Procedure**

- 1. Sample Collector-** The sampler shall sign their name.
- 2. Sample Collector Relinquished-** The sampler shall sign their name. The date and time the sample is relinquished shall be filled in. Note that there should never be any differences in the date or time a sample is relinquished and received! Custody of the sample shall be maintained until it is properly relinquished to another person or the contract lab. Do not relinquish custody to the lab or anyone else unless they are present and take custody of the sample. When the contract lab receives the sample, custody becomes the responsibility of the lab.
- 3. Received By-** Any personnel receiving custody of the sample shall sign their name. The date and time the sample was received shall be filled in.
- 4. Relinquished By-** Any personnel relinquishing custody of the sample shall sign their name. The date and time the sample was relinquished shall be filled in.
- 5. For Lab Use Only-** This section is reserved for and shall be completed by lab personnel.
- 6. Sample Field Parameters-** These are the analyses to be completed on site at the sampling location: Temperature, pH, and D.O. These blanks for the field parameters and are to be filled in with date, time, and initialed as completed by the person performing each analysis.
- 7. D.O. Meter Calibration-** Include the date and time of calibration. The person performing the calibration shall initial in the appropriate blank.
- 8. Comments-** This section is for any unusual observations, etc. noted during sampling.
- 9. Sample Source-** These are the locations to be sampled.
- 10. Sample Type-** The sample type shall be 'grab'.
- 11. Sample Container Size & Number-** This shall be as described in this procedure.

12. **Sample Preservative-** This shall be as required by the most recent edition of Standard Methods for Analysis of Water and Wastewater and the contract laboratory.
13. **Sample Collection Date-** List the date sample collection was collected.
14. **Sample Collection Time-** List the time the sample collection collected.
15. **Sample Temperature °C-** This is reserved for lab personnel to record the temperature of the sample when relinquished to the lab. Sampling personnel does not fill this out.
16. **Test Parameters-** These are the tests to be conducted by the lab.
17. **pH Meter Calibration Date, Time, Initial-** This is the date and time of the pH meter calibration, along with the initials of the person that performed the calibration.
18. **Buffer Value (after calibration)-** These are the values of the buffers after the meter is calibrated and is in the read mode. **Do not record any values as the meter is being calibrated. This practice is a common mistake.**
19. **pH Collection Date-** This is the date of the pH sample collection and should be the same as the sample collection date.
20. **pH Collection Time-** This is the time of the pH sample collection and should be the same as the sample collection time.
21. **pH Analysis Date-** This is the analysis date and should be the same as the collection date.
22. **pH Analysis Time-** This is the time of the pH analysis. It is required to be within 15 minutes of the sample collection time.

All other entries on the COC are already filled in.

#### **V. Chain of Custody Errors**

1. All corrections shall be in black ink, legible, and shall utilize the Dothan Utilities policy for handwriting numbers.
2. Any error made shall be corrected by drawing a single line through the error, making the correction near the original error, and initialing by the error. The use of corrective tape or white out is not allowed.
3. Only, the operator that made the erroneous entry can correct it. Therefore, if an error is noted after the COC is relinquished and in the absence of the operator that made the error, the operator in charge shall notify the operator that made the error and only the operator that made the error can make the correction. The COC shall

be maintained and stay with the samples all the way through delivery to the contract lab.

4. The contract lab and Wastewater Treatment Supervisor shall be notified of the COC error immediately.
5. The corrected COC shall then be delivered to the contract lab. In addition, a corrected copy will be forwarded to the Wastewater Treatment Supervisor and the corrected original filed.
6. Any corrections made to the COC shall be explained in the comments section of the COC.

## **VI. Disciplinary Action**

Any personnel that fail to comply with the Dothan Utilities “303 (d) Stream Monitoring and Sampling Procedure for Cypress and Beaver Creeks” is subject to disciplinary action.

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### **References:**

Federal Water Pollution Control Act Sections 303 (d) and 305 (b)  
ADEM Alabama’s Water Quality Assessment and Listing Methodology  
Standard Methods for Analysis of Water and Wastewater 21<sup>st</sup> Edition  
DEQ Laboratory Field Sampling Reference Guide  
40 CFR § 122.34

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**YOUR SIGNATURE BELOW INDICATES THAT YOU HAVE READ,  
UNDERSTAND, AND AGREE TO ABIDE BY THE DOTHAN UTILITIES  
303 (d) STREAM MONITORING AND SAMPLING PROCEDURE FOR  
CYPRESS AND BEAVER CREEKS.**

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EMPLOYEE’S NAME (PRINT)

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EMPLOYEE’S SIGNATURE

---

DATE

## Appendix J: Inspection Forms

## City of Dothan Pollution Prevention/Good Housekeeping Facility Checklist

Inspector's Name:

Date of Inspection:

Facility Inspected:

	Yes	No	N/A
<b>Maintenance</b>			
<b>Vehicle Maintenance</b>			
Indicators observed of vehicles leaking oil or other fluids? Indicators observed of leaks, drips, or spills?			
Any containers of fluids on the ground or exposed to precipitation?			
Any batteries stored outside or exposed to precipitation?			
Any oily vehicle parts exposed to precipitation?			
Are vehicles maintained near storm drains?			

<b>Vehicle Washing</b>			
Are any detergents or other chemicals outdoors or in the area of spigots?			

<b>Vehicle Storage</b>			
Indicators observed of vehicles leaking oil or other fluids? Indicators observed of leaks, drips, or spills?			
Indicators observed of corrosion on vehicles that could affect water quality or possibly cause chemical releases in the future?			
Any containers of fluids on the ground or exposed to precipitation?			
Any batteries stored outside or exposed to precipitation?			
Any oily vehicle parts exposed to precipitation?			
Are vehicles maintained near storm drains?			

<b>Chemical Storage</b>			
Indicators observed of chemicals stored outdoors or exposed to precipitation?			
Indicators observed of chemical containers leaking?			
Chemical containers not labeled or labeled incorrectly?			
Chemicals stored in high traffic areas or overhead?			

<b>Fueling Areas</b>			
Indicators observed of vehicles leaking oil or other fluids? Indicators observed of leaks, drips, or spills?			
Indicators observed of corrosion on vehicles that could affect water quality or possibly cause chemical releases in the future?			

Any containers of fluids on the ground or exposed to precipitation?			
Spill kits need maintenance?			

<b>Dumpsters</b>			
Are dumpsters open?			
Are dumpsters leaking?			

<b>Outdoor Material Storage</b>			
Any soluble materials exposed to precipitation?			
Any potentially hazardous material that could affect water quality exposed to precipitation?			
Any materials containing possible contaminants stored near storm inlets?			
Do any material storage containers have tops that are not sealed?			
Are any materials that are stored outside degrading, leaking, or corroding?			

<b>Outdoor Loading</b>			
Observed oil dripping, spills or leaking vehicles?			
Observed loading material spillage?			
Do loading areas have significant trash, dirt, or debris accumulation?			

**Comments**

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## MONTHLY BUILDING PERMIT STORMWATER INSPECTION

Permittee Name:	Facility/Site Name:
Permit Number:	
Facility Street Address or Location Description:	

1. <input type="checkbox"/> YES <input type="checkbox"/> NO Did discharges of sediment or other pollutants occur from the site? If "Yes", please list a description of the discharge(s) and their location(s):
2. <input type="checkbox"/> YES <input type="checkbox"/> NO Were BMPs properly implemented and maintained at the time of inspection? If "No", please provide location(s) and descriptions of BMPs that need maintenance:
3. <input type="checkbox"/> YES <input type="checkbox"/> NO Are BMPs needed in addition to those already present onsite at the time of inspection? If "Yes" please provide a description and location of additional BMPs that are needed:
4. <input type="checkbox"/> YES <input type="checkbox"/> NO Have any BMPs failed to operate as designed? If "Yes", please provide location(s) and description of BMP(s) that failed:
5. <input type="checkbox"/> YES <input type="checkbox"/> NO Were there BMPs required by the CBMPP that were not installed or installed in a manner not consistent with the CBMPP? If "Yes", please provide a description and location where the BMPs were not installed or installed incorrectly:

Comments:

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\_\_\_\_\_  
Inspector

\_\_\_\_\_  
Date

## DETENTION POND INSPECTION FORM

Name of Business: \_\_\_\_\_

Address of Business: \_\_\_\_\_

Checkpoint	Yes	No
Is outlet structure functioning properly?		
Is there any erosion of pond banks?		
Is the pond overgrown?		
Is the pond littered with trash?		
Have grass/vegetation clippings been removed from pond?		
Other item (specify)		
Other item (specify)		

Inspection Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Inspected by: \_\_\_\_\_

Date Inspected: \_\_\_\_\_

## Appendix K: Dry Weather Screening Report

# City of Dothan



## Dry Weather Screening Report

Date: \_\_\_\_\_

Time: \_\_\_\_\_

Outfall Number: \_\_\_\_\_

Inspection Type:  Initial  Follow Up

Was the location shown on the map safely accessible?  YES  NO

If No, provide new location of the dry weather screening: \_\_\_\_\_  
\_\_\_\_\_

Is there water in the Drainage Ditch?  YES  NO

If yes, is it  Flowing or  Stagnant

**\*\*\*Take Pictures of the Existing outfall and attach to report\*\*\***

Is there any debris or litter around outfall?  YES  NO

If water is present is it discolored?  YES  NO

If water is present is there an odor?  YES  NO

Is there any other indication of a possible illicit discharge coming from this outfall? \_\_\_\_\_  
\_\_\_\_\_

If illicit discharge is present was the source found?  YES  NO

**\*\*\*Take Pictures of all suspected illicit discharges and attach to report\*\*\***

**\*\*\*Provide a copy of report and pictures to Engineering Services\*\*\***

Additional Comments:  
\_\_\_\_\_  
\_\_\_\_\_

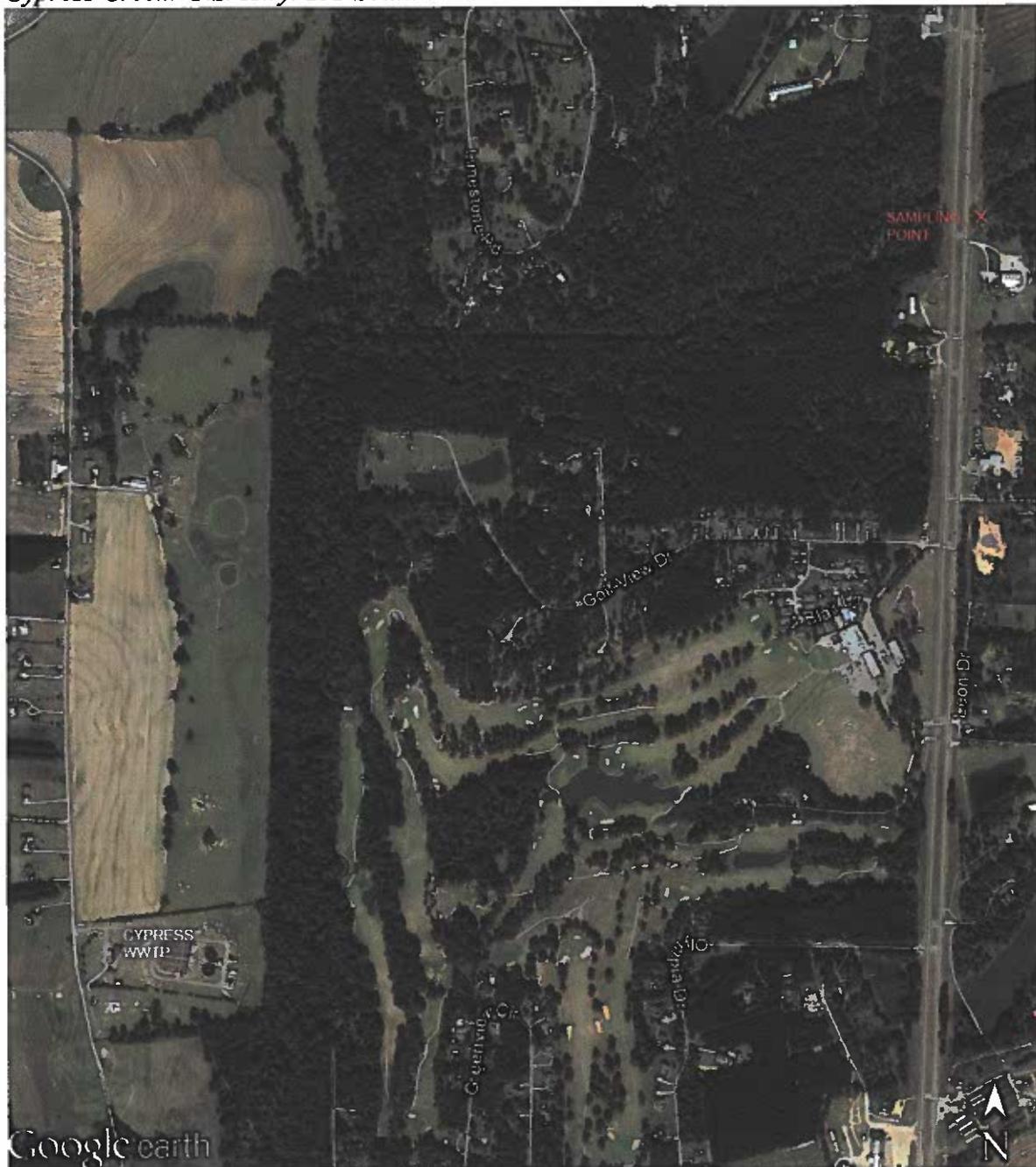
\_\_\_\_\_  
Inspector

## Appendix L: 303(d) Stream Monitoring Locations

*Cypress Creek: Old Cypress WWTP*

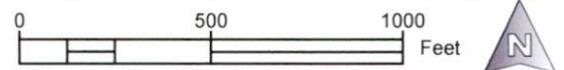


Cypress Creek: U.S. Hwy. 231 South



# COOPER CREEK

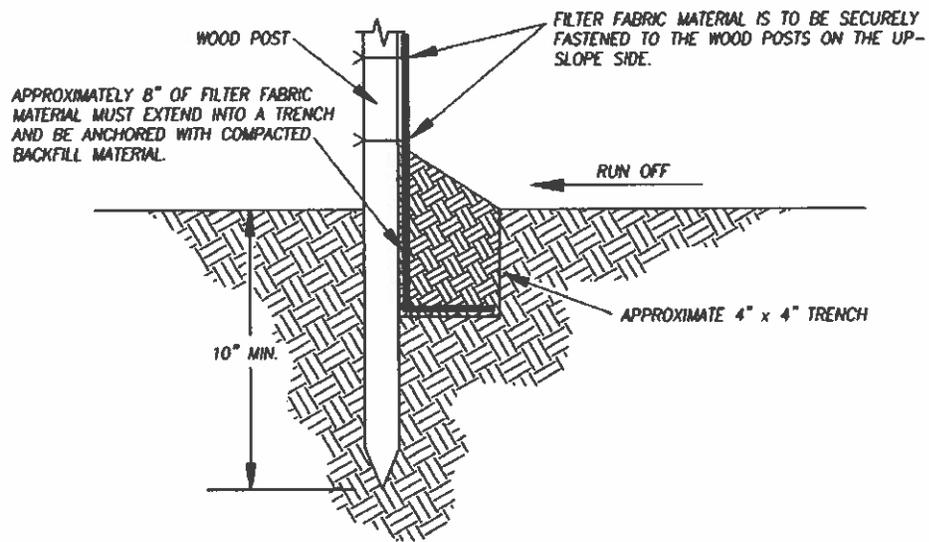
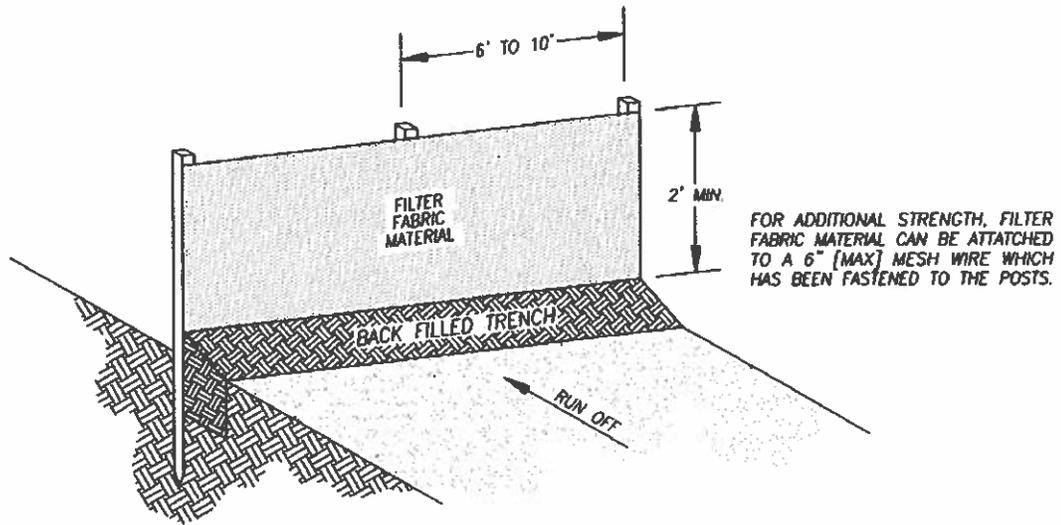
## 303 (d) LIST SAMPLING POINT





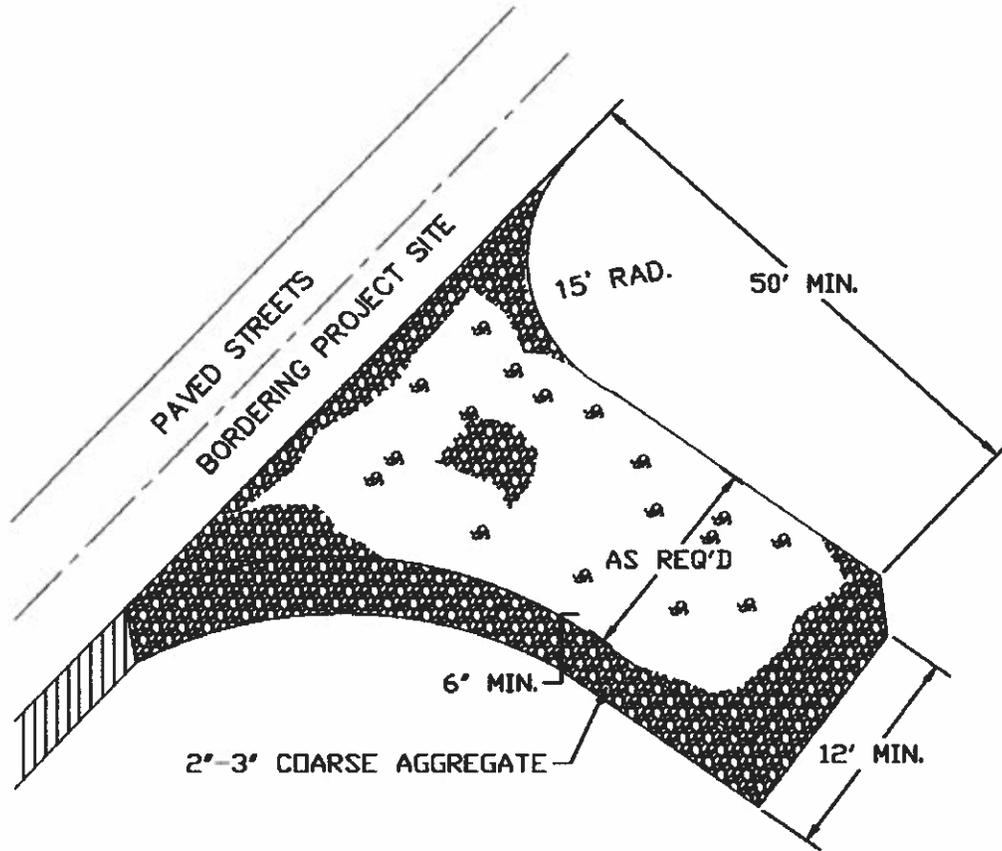
## Appendix M: Erosion Control Details

# CLASS B FILTER FABRIC SILT FENCE INSTALLATION



DETL-96

# TEMPORARY CONSTRUCTION ENTRANCE



**NOTE:**  
GRAVEL PAD IS REQUIRED TO PROVIDE A BUFFER AREA WHERE VEHICLES CAN DROP THEIR MUD AND SEDIMENT TO AVOID TRANSPORTING IT ONTO PAVED STREETS, TO CONTROL EROSION FROM SURFACE RUNOFF, AND TO HELP CONTROL DUST.

DET-81

## Appendix N: Map of Recycling Locations



# Recycle Drop Off Locations City of Dothan

