

City of Oxford

Storm Water Management Plan

Permit No. ALR040048

Prepared by
City of Oxford
Oxford Water Works & Sewer Board

December 2016
Revised October 2018

Certification

City of Oxford, Alabama

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

Rusty Gann, City Engineer

City of Oxford, Alabama

ATTEST:

Alton Craft, Mayor

City of Oxford, Alabama

ATTEST:

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Chapter 1 – Introduction

1-1 Program Overview

This document presents the City of Oxford’s Storm Water Management Program (SWMP) as required by the Alabama Department of Environmental Management’s (ADEM) National Pollutant Discharge Elimination System (NPDES) Phase II Municipal Separate Storm Sewer System (MS4) Permit. This permit covers storm water discharges from regulated small municipalities. The overall goal of the program is to protect water quality by an effort to reduce to the maximum extent practicable the discharge of pollutants in storm water.

1-2 Regulatory Background

In 1990, the Environmental Protection Agency (EPA) promulgated regulations establishing Phase I of the NPDES storm water program. The Phase I program for municipal separate storm sewer systems (MS4s) requires operators of “medium” and “large” MS4s that generally serve populations of 100,000 or greater to implement a storm water management program to control polluted discharges from certain municipal, industrial and construction activities into the MS4.

In 1999, EPA promulgated regulations establishing Phase II of the NPDES storm water program. The Phase II program extends coverage of the NPDES storm water program to regulated “small” MS4s. A regulated small MS4 is located within an “urbanized area” as defined by the Census Bureau or as designated by the NPDES permitting authority. The ADEM presently has primary jurisdiction over permitting and enforcement of the storm water program for Alabama. On January 31, 2011, ADEM issued MS4 Phase II General Permit (NPDES Permit Number ALR0400048) for storm water discharges associated with small MS4s. The Phase II permit was modified in February 2012, reissued on October 1, 2016 and will expire on September 30, 2021. The City is implementing the most current permit.

1-3 Regulated Area

The Phase II MS4 general permit applies to operators of regulated small MS4s that discharge storm water to waters of the State. The City of Oxford is located in Calhoun County and Talladega County;

south of Anniston and north of Munford and the City of Talladega and is rapidly growing and developing city. The City of Oxford's population is 21,348 from the 2010 census which reflects a growth of 46.3% since the 2000 census. This makes the City of Oxford an appropriate size to be a Phase II MS4.

1-4 Legal Authority

The City of Oxford was officially incorporated in February 1852. As an incorporated city, Oxford has the legal authority to create land use and design regulations for developments within the City and its corporate limits (Figure 1). In July of 2000, the City adopted an Ordinance providing for control of Erosion Siltation with a penalty clause and a severability clause (Ordinance No. 20-0-14). In February 2017, the City adopted an Ordinance for Illicit Discharge Detection and Elimination (Ordinance No. 2017-05) and an Ordinance for Post Construction Storm Water Management (Ordinance No. 2017-08). These Ordinances are included in the Appendices of this report.

1-5 Water Quality Concerns

The City of Oxford's primary receiving water is Choccolocco Creek. The water use classification is listed as Fish and Wildlife and Swimming by ADEM. Choccolocco Creek is on the 303(d) list for mercury and PCB impairment. Anniston drains to Snow Creek which passes through the City of Oxford and Oxford has some drainage into Snow Creek, which eventually drains to Choccolocco Creek. Choccolocco Creek then drains to the Coosa River. The City of Oxford lies within the Coosa River Watershed (Figure 2), which has an approved total maximum daily load (TMDL) for Nutrients (Total Phosphorous) and Organic Enrichment.

A. Discharge Compliance with Water Quality Standards

This general permit requires, at a minimum, that permittees develop, implement and enforce a storm water management program designed to reduce the discharge of pollutants to the maximum extent practicable. Full implementation of BMPs, using all known, available, and reasonable methods of prevention, control and treatment to prevent and control storm water pollution from entering waters of the State of Alabama is considered an acceptable effort to reduce pollutants from the municipal storm drain system to the maximum extent practicable.

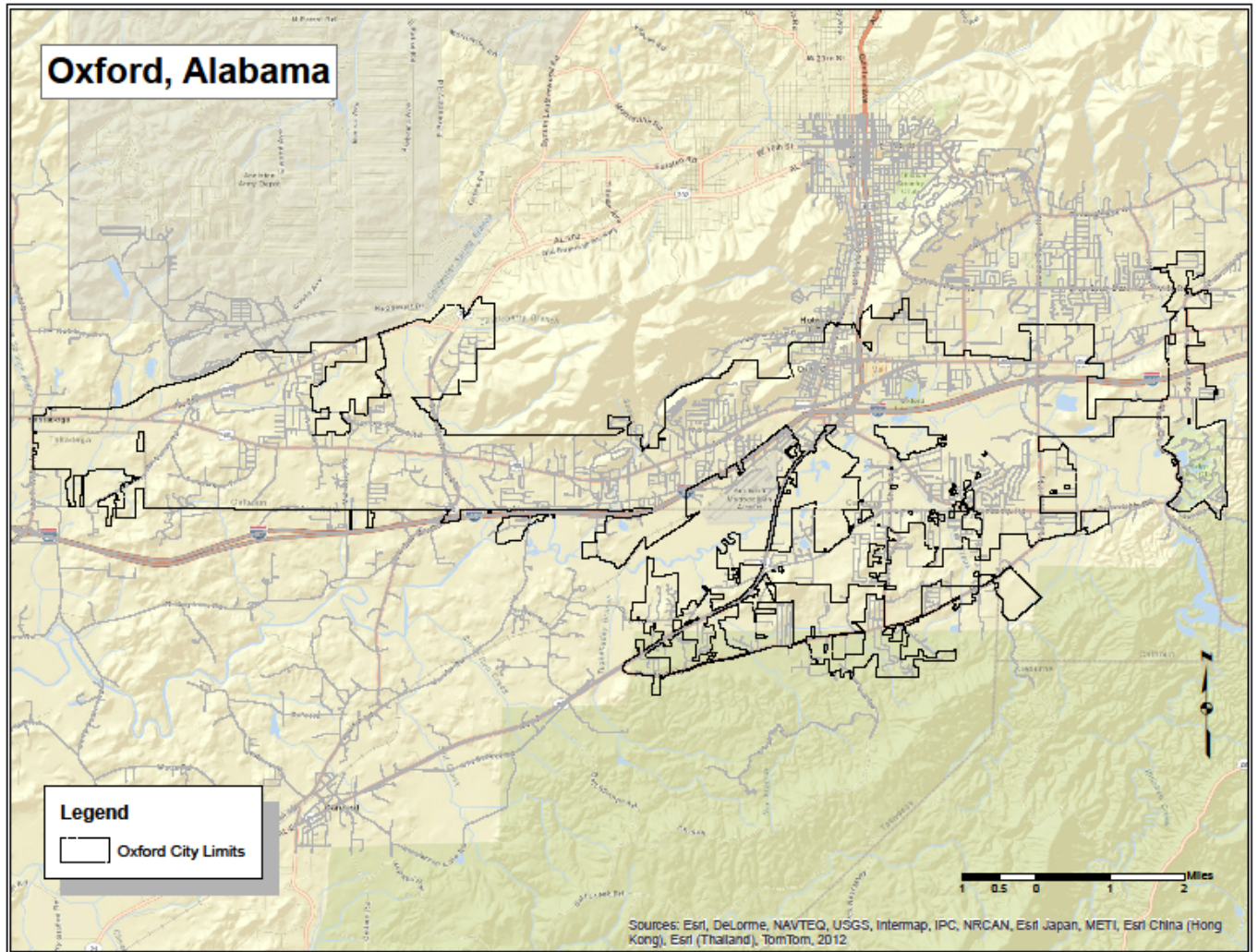


Figure 1 – Oxford City Limits

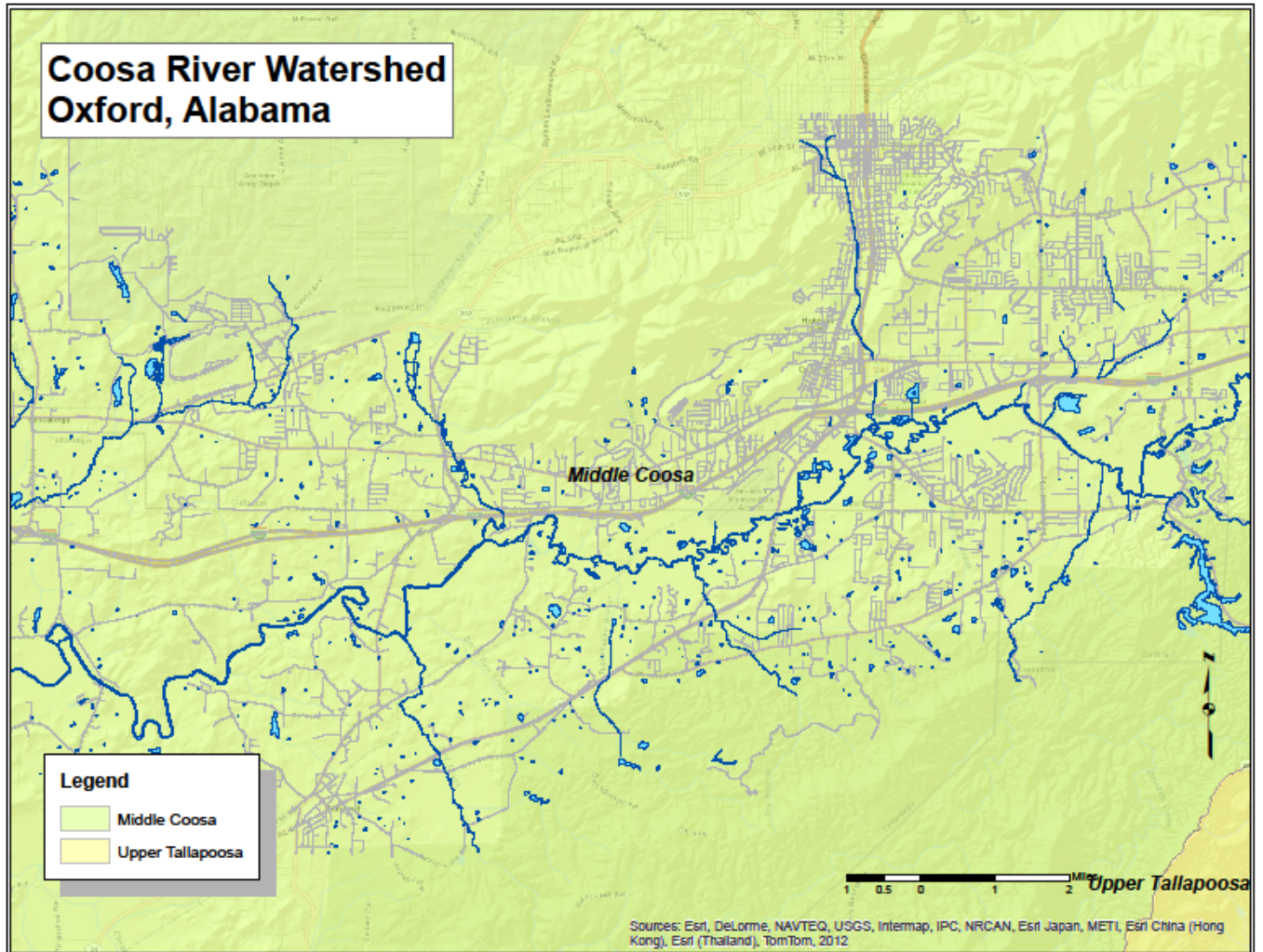


Figure 2 – Coosa River Watershed

Chapter 2 – Program Management

2-1 SWMP Plan Implementation Responsibilities

Although the Building Official is the lead implementer of the SWMP, no single department within the City is responsible for all of the necessary activities. Therefore, multiple departments and agencies have a role in program management. They are anticipated to be:

- City of Oxford, City Council
- City of Oxford, Mayor's Office
- City of Oxford Building Department
- City of Oxford Engineering Department
- City of Oxford Street Department
- City of Oxford Parks & Recreation Department
- City of Oxford Fire Department
- Oxford Water Works & Sewer Board

The relationships between the departments and the following discussion are dependent upon the solidification of each department's responsibilities during program development.

A. City of Oxford City Council

The City Council is responsible for the promulgation of all City resolutions and ordinances and the approval of budgetary expenditures related to the implementation of the Storm Water Management Program.

B. Mayor's Office

The Office of the Mayor is responsible for overall oversight of the program, and for maintaining communication with the City Council. This communication can be during City Council meetings or on as-needed basis.

C. Building Department

The Building Department will lead the day-to-day activities and administration of the program, with substantial assistance and input from other departments, as depicted in this Plan. The Building Official will take the lead in assuring that MS4 training occurs citywide. The Building Department will assist with flood plain management, illicit discharge detection and elimination, construction site runoff control,

post-construction storm water management, and training with the good housekeeping for Municipal Operation's Minimum Control Measures (MCMs).

D. Engineering Department

The City is currently moving offices and will be opening a new Public Works Building by the end of 2016. Once the offices are moved to the Public Works Building, all storm water records kept in the storm water database will be managed by the Engineering Department for contractor compliance with storm water monitoring and inspections.

E. Street Department

The Street Department will have a role in some of the MCMs, including trash pickup and the recycling program.

F. Parks & Recreation Department

The Parks & Recreation Department will have a role in several of the MCMs, including public education, illicit discharge detection and elimination. In addition, the Parks and Recreation Department is responsible for City owned and maintained grounds and landscaping and will be largely responsible for the Pollution Prevention/Good Housekeeping for Municipal Operation's MCM.

G. Fire Department

The Fire Department provides a support role through hazardous waste spill reporting and cleaning techniques. The responsibilities include public education, illicit discharge detection and elimination and pollution prevention and good housekeeping.

H. Water Works & Sewer Board

The Oxford Water Works & Sewer Board will assist in the development of the Educational Outreach requirements of the Permit. The Water Works & Sewer Board may also assist in sampling and analysis of the storm water, but will turn over the permit renewal and agency communication to the Oxford Building Department.

2-2 Coordination between Local MS4s

Currently the City is receiving help from the Water Works & Sewer Board for compliance with the general permit. Due to the close relationship between the two entities, there is no need for any Intra-Jurisdictional Agreements. The City does anticipate sharing some of the efforts in implementing various MCMs of the permit such as Education Outreach and Public Participation.

This coordination will be on a voluntary basis only and allow for cost effective implementation of certain program MCMs.

2-3 SWMP Revisions and Updates

As part of the annual review of the SWMP in conjunction with the preparation of the annual report, all revisions and updates that are required by ADEM or necessary to maintain permit compliance will be submitted to the Department for review. Upon being revised and updated, the modified SWMP plan will become effective.

Chapter 3 – Program Elements

This chapter provides guidance to staff and others to meet the requirements of the ADEM general permit for storm water discharges from the MS4.

The six Minimum Control Measures (MCM) are:

1. Public Education and Outreach
2. Public Participation/Involvement
3. Illicit Discharge Detection and Elimination
4. Construction Site Runoff Control
5. Post Construction Storm Water Management
6. Pollution Prevention/Good Housekeeping for Municipal Operations

The following sections in this chapter will detail the MCM with the following criteria for each MCM:

Permit Requirements

Target Audiences

Target Pollutant Sources

Outreach Strategies

Goals and Timelines

Evaluation Techniques

3.1 Public Education and Outreach (MCM 1)

Permit Requirement

The Public Education and Outreach (MCM 1) requires the City to implement and evaluate a public education and outreach program that distributes educational materials to the community or conducts equivalent outreach activities about the impacts of polluted discharges on water bodies and the steps that the public can take to reduce pollutants in storm water runoff to the maximum extent practical.

Target Audiences

MCM 1 includes various target audiences. Residential, commercial and industrial developers have been involved in the SMWP development. The general public, schools, elected officials, developers, contractors and professional groups will be targeted for ongoing involvement in the SWMP implementation and evaluation. Federal, state and other local agencies will be included in these processes as well. Educational materials will be specifically tailored to communicate a specific storm water pollutant concern to a targeted audience.

Target Pollutants and Sources

Non-point source pollutants found in storm water will be targeted by MCM 1. These pollutants include, but are not limited to, sediment, trash, fertilizers, pesticides, pathogens and oils and greases. The sources that are targeted include, but are not limited to, illegal dumping, pool water disposal, car washing, home and auto repair, failing septic systems, illicit discharges, impacts from development, construction site erosion, commercial parking lot runoff and improper application of fertilizers, pesticides, and herbicides.

Some of the target sediment sources may include:

- Residential development
- Commercial development
- All-terrain trespass erosion
- Construction site erosion

Outreach Strategies, Goals and Timelines

The City employs a variety of strategies for MCM 1 from the utilization of existing materials from other agencies and permittees to the creation of new materials to educate the targeted audiences. Some of the City's current and future compliance activities include:

Brochures, pamphlets, Environmental Webpage, Workshops, Education, Recycling, Watershed Signage and Environmental Awareness Signage, and Elected Officials Training. These strategies will present best management practices that are effective in reducing the impacts of pollutants on storm water runoff. Each outreach strategy will be detailed below along with its goal, timeline and department responsible for implementation of the measure.

A. Continue Distribution of Storm Water Education Outreach Information

Current Program: This element of MCM (1) will allow for the distribution of new and existing storm water education information for targeted groups, such as:

- Erosion and sediment control brochures for contractors working in the City,
- Flyers for presentations given to school children,
- Flyers targeting residential activities to homeowners, or
- Storm water commercials for general public.

Storm water information was sent out beginning in 2014 on a monthly basis (12 times per year) on the backs of the water and sewer bills to each of the 9,600 water and sewer customers. The backer is changed every six (6) months to cover all of the topics of storm water education. Copies of the storm water educational information backers are available on the City's website. Also, over one thousand (1,000) storm water commercials are run each year to educate the public on local television and radio stations.

Potential Target Audience: Contractors, Developers, Elected Officials, General Public, Home Owners, Landscapers, Schools

Measurable Goals: In 2017, the City will compile a list of new storm water educational brochures and pamphlets that can be used in the next few years to continue this element of the MCM 1. Educational information is currently sent out on a monthly basis with the water and sewer bills (12 times per year) to all of the existing 9,600 customers. Also, distribution locations will be changed as necessary and the City will continue to run updated storm water commercials on local television and radio channels throughout the permit cycle to ensure reaching the widest audience for informational distribution. Erosion and sediment control brochures detailing effective BMPs to reduce sediment impacts to storm water will be distributed to all residential home builders licensed in the City when they apply for their initial or renewal home builder license. The brochures will also be distributed when a building permit is issued.

During 2017-2021, the City will create one additional storm water brochure per year with a specific target audience. These additional storm water brochures will be distributed monthly in the water and sewer bills to all of the existing 9,600 customers. Also, copies of these brochures will be available on the City of Oxford's Environmental Web Page.

Responsible Department: Building Department, Water Works & Sewer Board (Brochure distribution)

B. Environmental Web Page

Current Program: The internet provides a very accessible means for making information and data available to citizens. The City's website features an Environmental Outreach page, which has links to the City's SWMPP, Annual Report, and other storm water related topics, as well as information on any existing and future storm water related activities. The City has developed an email link through the Oxford 311 link on the City's website for public inquiries and complaints related to storm water and other environmental issues.

Potential Targeted Audience: General Public

Measurable Goals: The City will continue to maintain and update its website environmental outreach page and maintain updated links to its SWMP and Annual Report, storm water related topics, information about the storm water management program in general, upcoming program events, information about how readers can reduce storm water impacts and links to other related websites to remain in compliance with the general permit. The City Building Department will be responsible for responding to the emails, inquiries, and complaints during normal business hours.

Responsible Department: Building Department

C. Workshops

Current Program: Workshops are useful in educating a target audience about specific topic issues. Using existing training programs, the City will work with its partners to sponsor workshops in a variety of storm water topics for homeowners and the professionals. Examples of some potential workshops include but are not limited to the following: Nonpoint Education for Municipal Officials (NEMO), Rain Barrel, Erosion and Sediment Control, Stream Restoration, Invasive Species Control, and Low Impact Development (LID)/Green Infrastructure (GI) Workshops.

Potential Targeted Audience: Contractors, Developers, Elected Officials, Homeowners, Landscapers, and Professionals

Measurable Goals: During 2017, the City's Building Department will determine the specific storm water topics to be discussed in the workshops. The City will sponsor one workshop per year of the permit cycle.

Responsible Department: Building Department, Mayor's Office

D. School Presentation

Current Program: Teaching young students the importance of proper storm water management is of utmost importance to the success of any storm water program. One aspect is the way the student can reduce storm water impacts. Educating the school age sector is the key to a future with successful storm water management. The City helps sponsor Earth Day at the elementary schools. Crushed Oreos and gummy worms are used to show how erosion occurs and runoff enters the storm water system. The children can eat their "mud and worms".

Potential Targeted Audience: Classroom Students

Measurable Goals: Each year following the implemented SWMP, the City will continue to sponsor clean water presentations at one of the six (6) Oxford city schools. In the 2018-19 school year, the City will begin an annual Water Day Expo to present storm water facts and other related topics to the students that attend the Expo.

Responsible Departments: Building Department, Water Works & Sewer Board

E. Recycling

Current Program: All recycling programs are a benefit to storm water management because they reduce a potential pollutant source by reducing, recycling and reusing.

Potential Targeted Audience: Homeowners

Measurable Goals: Recycling information will be included on the city website, in environmental brochures and pamphlets distributed to citizens, and displayed in prominent areas within City Buildings. Recycling Dumpsters are located within Oxford and will be monitored to determine the need for additional recycling bins throughout the city.

Responsible Departments: Street Department



Figure 3 – Recycling Dumpster Locations

F. Watershed Signage and Environmental Awareness Signage

Current Program: Watersheds are a logical way to think about the connection between the land and the quality of water we enjoy. 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 a clean drinking water supply. Watershed signs increase public awareness about the importance of watersheds and encourage good stewardship of our valuable streams, wetlands, lakes and ground water.

Watershed signs have been installed at Friendship Road and Leon Smith Parkway in Oxford. Oxford will be installing placards that read “Only Rain in the Drain” on the gutter inlets throughout the City. Oxford has installed pet waste stations at local parks to encourage pet waste cleanup to protect our waterways.

Potential Targeted Audience: General Public

Measurable Goals: During the implemented SWMP, the City will implement approximately three (3) more watershed signs along the Watershed. The City will also be installing “Only Rain in the Drain” placards on the gutter inlets throughout the City, instead of painting the slogan on the inlets.

The City will inspect and maintain existing watershed and environmental awareness signage and increase the number of signs as needed. Throughout the permit cycle, Environmental Programs will encourage and assist any Boy Scout seeking an Eagle Scout Project in an environmental area. The City

will identify gutter inlets that need placards and maintain those already designated. The City will maintain the pet waste stations and investigate other areas where pet waste cleanup is an issue.

Responsible Departments: Building Department, Parks & Recreation Department

G. Elected Officials Training

Current Program: Since elected officials are responsible for approving resolutions and ordinances that guide the implementation of the City's SWMP and also have budgetary control of it, it is very important to expand their knowledge of storm water management.

Potential Targeted Audience: Elected officials

Measurable Goals: The City will sponsor and/or host one NEMO workshop every permit cycle.

Responsible Department: Building Department

Evaluation Techniques

The evaluation of a public education and outreach program is best measured by the goals that are met. At the end of the permit year, the City will evaluate the overall effectiveness of MCM 1 through assessment of the success of the goals that were achieved.

3-2 Public Involvement/Participation

Permit Requirements

Public Participation/Involvement MCM 2 requires the City to develop, implement and evaluate a public participation program centered on the SWMP and the annual report. The development of this program will be documented throughout the process. The ongoing activities for public involvement may include advisory councils, watershed associations, committees, stewardship programs and other environmental related activities. Once approved, the SWMP will be available to the public on the City's website.

Target Audiences

MCM 2 includes various target audiences. Residential, commercial and industrial developers have been involved in the SMWP development. The general public, schools, elected officials, developers, contractors and professional groups will be targeted for ongoing involvement in the SWMP implementation and evaluation. Federal, state and other local agencies will be included in these processes as well.

Target Pollutants and Sources

Non-point source pollutants found in storm water will be targeted by MCM 2. These pollutants include, but are not limited to, sediment, trash, fertilizers, pesticides, pathogens and oils and greases. The sources that are targeted include, but are not limited to, illegal dumping, failing septic systems, impacts

from development, construction site erosion, commercial parking lot runoff and improper application of fertilizers, pesticides, and herbicides.

Outreach Strategies, Goals and Timelines

The City will employ a variety of strategies for MCM 2 from involvement with existing groups to developing additional mechanisms. Some efforts will also focus on public participation as a whole. Each strategy will be detailed below along with its goal, timeline and department responsible for implementation of the measure.

A. Citizens Environmental Advisory Committee (EAC)

Current Program: The City Council recently recommended the formation of a Citizen's Environmental Advisory Committee (EAC) (Resolution 2017-16). The Committee will serve various roles for the City from the annual review of the SWMP to environmental ordinance review and promulgation. Also, the committee will assist the City in applying for federal and state grant monies to support its efforts in storm water management through each of the MCM.

Measurable Goal:

In 2017, the City will designate members of the community for the Environmental Advisory Committee (EAC). The Committee will begin holding at least two (2) EAC meetings a year. The Committee will address storm water issues, environmental concerns, and public outreach. During one of the meetings, the City's SWMP will be reviewed and updated as needed to maintain permit compliance. During the permit cycle, the EAC will continue to meet and identify areas of concern and proposed projects.

Responsible Departments: Building Department, City Council

B. Watershed Organizations

Current Program: The Choccolocco Creek Watershed Alliance is a local group made up of citizens from diverse backgrounds to promote the watershed and environmental education and awareness. The group puts together watershed awareness, education, and cleanup.

Measurable Goal: The City will help sponsor and promote some of the activities of the Choccolocco Creek Watershed Alliance. Community leaders will attend at least one (1) of the Watershed Alliance event per year.

Responsible Department: Building Department, City Council

C. Educational Events

Current Program: Oxford creates educational events to educate students about all aspects of the water cycle and other related natural resources. The City will develop the program and provide the educational information and entertainment for the Festival. This effort instills in the students a general

environmental awareness and stewardship, as well as specific issues and protection strategies. The educational events include students, their teachers and parents.

Measurable Goal: Through the duration of the permit cycle, City staff will participate in and help sponsor the educational events.

Responsible Department: Building Department, Parks & Recreation Department, Water Works & Sewer Board

D. City Clean Up Events

Current Program: The City provides garbage pickup for citizen. Citizens are permitted to dispose of any material except putrescible garbage, hazardous chemicals and tires.

Measurable Goal: Through the duration of the permit cycle, City staff will participate and/or assist with at least one clean-up day per permit year.

During 2017, the City will continue the program as is. In years 2018 through 2021, the Engineering Department will work with the City, County and other municipalities to sponsor/and or assist with a household hazardous waste amnesty day. The Clean Up events can include neighboring city cleanups as well.

Responsible Department: Street Department, Building Department, Parks & Recreation Department, Engineering Department

F. Environmental Web Page

Current Program: The internet provides a very accessible means for making information and data available to citizens. The City's website features an Environmental Outreach page, which has links to the City's SWMPP, Annual Report, and other storm water related topics, as well as provide information on any existing and future storm water related activities.

Potential Targeted Audience: General Public

Measurable Goals: The City will continue to maintain and update its website environmental outreach page and maintain updated links to its SWMP and Annual Report, storm water related topics, information about the storm water management program in general, upcoming program events, information about how readers can reduce storm water impacts and links to other related websites to remain in compliance with the general permit. The City has developed an email link for public inquiries and complaints related to storm water under the Oxford 311 link on the City's website. The City Building Department will be responsible for responding to the emails, inquiries, and complaints during normal business hours.

Responsible Department: Building Department

G. Comprehensive Plan

Current Program: The City has adopted a Comprehensive Plan. The City will seek public input through meetings with the general citizens, comments/questions via the website, public officials, City staff, the City Council and various other entities once a year. The plan is developed as guidance for future development within Oxford. There were at least four guiding principles or mission statements outlined in the document. They are listed below:

1. To continually confirm our purpose as the “Preferred Community in North Central Alabama” by providing superior educational facilities and opportunities so that Oxford educational facilities and opportunities so that Oxford children may remain nationally competitive graduates.
2. Excel in the provision of protection services, infrastructural facilities and cultural opportunities so that Oxford residents are afforded the highest quality of living possible.
3. Maintain vigorous citizen’s oversight of municipal activities to ensure that opportunities are realized for continuous improvement in the provision of services, facilities and resources.
4. Foster an atmosphere which stimulates economic growth and attracts quality industry through adequate transportation facilities, a stable and active business environment, a skilled and educated work force and a strong customer base.

This document is available upon request at the Oxford Building Department.

Measurable Goal: Within the permit cycle, the Comprehensive Plan would be reviewed by the Environmental Advisory Committee (EAC) and the committee will make recommendations for any future updates.

Responsible Departments: Building Department, City Council

Evaluation Techniques

The evaluation of a public participation/involvement program is best measured by the goals that are met. At the end of the permit year, the City will evaluate the overall effectiveness of MCM 2 through assessment of the success of the goals that were achieved.

3-3 Illicit Discharge Detection and Elimination (IDDE)

Illicit discharges into a storm drain system are defined by EPA as “....any discharge to a MS4 that is not composed entirely of storm water...” 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 storm water.

Permit Requirement

The Illicit Discharge Detection and Elimination (MCM 3) 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:

1. Annually update the storm water 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. To the extent allowable under State or local law, effectively prohibit, through ordinance, or other regulatory mechanism, non-storm water discharges into the MS4 and implement appropriate enforcement procedures and actions.
2. Develop and implement a plan to detect and address non-storm water discharges, including illegal dumping, to the system that are not authorized by a separate NPDES permit; inform public employees, businesses, and the general public of the hazards that are generally associated with illegal discharges and improper disposal of waste.

Exclusions

The Illicit Discharge Detection and Elimination MCM will include measures to control illicit discharges and improper disposal of wastes into storm water. In the execution of this element, the City of Oxford will exclude the following categories of non-storm water discharges that are not required to be addressed by the State:

1. Water Line Flushing
2. Landscape Irrigation
3. Diverted Stream Flows
4. Rising Ground Waters
5. Uncontaminated Groundwater Infiltration
6. Uncontaminated Pumped Groundwater
7. Discharges from Potable Water Sources
8. Foundation Drains
9. Air Conditioning Condensation
10. Irrigation Water
11. Springs
12. Water from Crawl Space Pumps
13. Footing Drains
14. Lawn Watering
15. Individual Residential Car Washing
16. Flows from Riparian Habitats and Wetlands
17. De-chlorinated Swimming Pool Discharges
18. Fire Fighting Flows

Target Audience

Residential, commercial and industrial developers have been involved in the SMWP development. The general public, schools, elected officials, developers, contractors and professional groups will be targeted for ongoing involvement in the SWMP implementation and evaluation. Federal, state and other local agencies will be included in these processes as well.

Target Pollutants and Sources

Non-point source pollutants found in storm water will be targeted by MCM 3. These pollutants include, but are not limited to, sediment, paints, fertilizers, pesticides, swimming pool discharges, pathogens and 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, unpermitted construction site discharges, improper disposal of fertilizers, pesticides, and herbicides, paints, etc..

The City of Oxford appoints the Oxford Water Works & Sewer Board members. The Water Works & Sewer Board assists the City of Oxford with some of their ADEM permits. The City and the Water Works & Sewer Board have a great relationship and work together to achieve compliance with all environmental permits.

Outreach Strategies, Goals and Timelines

The City will employ a variety of strategies for MCM 3 from creation and enforcement of ordinances to education outreach. The City's goal is to reduce illicit discharge to our MS4 to the maximum extent practicable. Each strategy will be detailed below along with its goal, timeline and department responsible for implementation of measure.

A. Compiling and Organizing Existing City's Storm Water Infrastructure Data

Current Program: This element of MCM 3 will involve staff locating all existing storm water infrastructure data in GIS format, manipulating it into more usable software and creating new maps. The City has listed the coordinates for the 49 Storm Water Outfall Points in Table 1. A map of the locations of these Storm Water Outfall Points is shown in Figure 4 below.

Measurable Goal: Throughout the implemented SWMP, the City will continue to update the storm water outfall maintenance database that tracks the location, description, and condition of each existing outfall with an additional layer to track inspections and notes. The database will also allow for the addition of new outfalls submitted in As-built form to the City of Oxford. Data would be compared and shared with GIS Department at Oxford Water Works & Sewer Board, as well as Calhoun County's GIS Department. Based upon continual updating of the inventory of the storm water outfall points, the City will be able to regularly monitor the outfall points and identify illicit discharges quickly. Once illicit discharges are identified, the City can work to eliminate the cause.

Responsible Department: Building Department, Water Works & Sewer Board

Table 1 - Oxford Storm Water Outfall Points

FID	OUTFALL	LATITUDE	LONGITUDE	EASTING	NORTHING
0	A073	33.6191133	-85.9261498	627910.2	1134716.07
1	A075	33.6082143	-85.932248	626049.98	1130751.85
2	B016	33.605933	-85.9695563	614689.66	1129934.74
3	B017	33.6066939	-85.9669949	615469.79	1130210.64
4	O054	33.5920072	-85.9208449	629516.89	1124851.33
5	O056	33.6004592	-85.8719297	644414.04	1127917.77
6	O058	33.6032837	-85.8248836	658739.39	1128943.64
7	O059	33.6167437	-85.8254624	658563.03	1133841.46
8	O062	33.6030047	-85.8130106	662354.61	1128842.62
9	O065	33.601983	-85.8100342	663261.16	1128470.93
10	O066	33.6087628	-85.7796002	672526.77	1130941.4
11	O067	33.608111	-85.781865	671837.32	1130703.88
12	O071	33.6026513	-85.7505225	681381.97	1128723.28
13	O072	33.6017416	-85.7502289	681471.45	1128392.59
14	C248	33.622034	-85.933324	625727.23	1135781
15	C250	33.5948984	-85.9482004	621187.68	1125911.44
16	C321	33.589099	-85.749148	681804.35	1123792.33
17	C322	33.5864246	-85.7460167	682758.68	1122820.1
18	C090	33.5941445	-86.0078391	603026.03	1125662.82
19	B007	33.6002997	-86.0024103	604682.94	1127899.76
20	C092	33.5902433	-86.0122058	601693.74	1124245.23
21	O011	33.5967898	-85.8646497	646630.38	1126581.94
22	O050	33.5952669	-85.8627092	647221.28	1126027.58
23	A035	33.622149	-85.8299097	657208.81	1135808.16
24	O014	33.6111952	-85.8245459	658842.07	1131822.3
25	O016	33.6037415	-85.8161448	661400.29	1129110.26
26	O015	33.6028804	-85.8240151	659004.01	1128796.66
27	O017	33.6069115	-85.8016552	665811.96	1130264.8
28	O018	33.6065614	-85.7908569	669099.74	1130138.62
29	O019	33.6063499	-85.7893104	669570.8	1130062.04
30	O020	33.0614884	-85.7831801	671438.1	1128293.71
31	C070	33.5587798	-85.8263597	658291.06	1112749.56
32	C032	33.5817571	-85.8071291	664147.57	1121111.32
33	O053	33.6011942	-85.8119012	662692.73	1128183.7
34	O013	33.5860643	-85.8427921	653286.04	1122677.67
35	B006	33.6022604	-85.9983653	605915.78	1128610.97
36	B009	33.6050153	-85.9863906	609563.25	1129607.86
37	B004	33.6060364	-85.9848999	610017.78	1129978.72
38	B003	33.6064901	-85.9714908	614100.77	1130138.21

City of Oxford Storm Water Management Plan

39	B002	33.6067218	-85.9661249	615734.7	1130220.49
40	B008	33.6030567	-85.9948923	606973.73	1128899.32
41	C166	33.6119865	-85.9326092	625941.38	1132124.88
42	C165	33.6112762	-85.9342843	625431.16	1131866.65
43	A051	33.605677	-85.9302822	626647.71	1129828.12
44	B005	33.6042764	-85.991823	607908.89	1129341.45
45	A036	33.6008714	-85.9248148	628310.76	1128077.8
46	O008	33.597529	-85.8802878	641868.55	1126852.65
47	O004	33.5905113	-85.9088019	633183.92	1124304.08
48	O003	33.5899223	-85.9180075	630380.52	1124091.92
49	O001	33.5959205	-85.9229973	628862.77	1126275.75

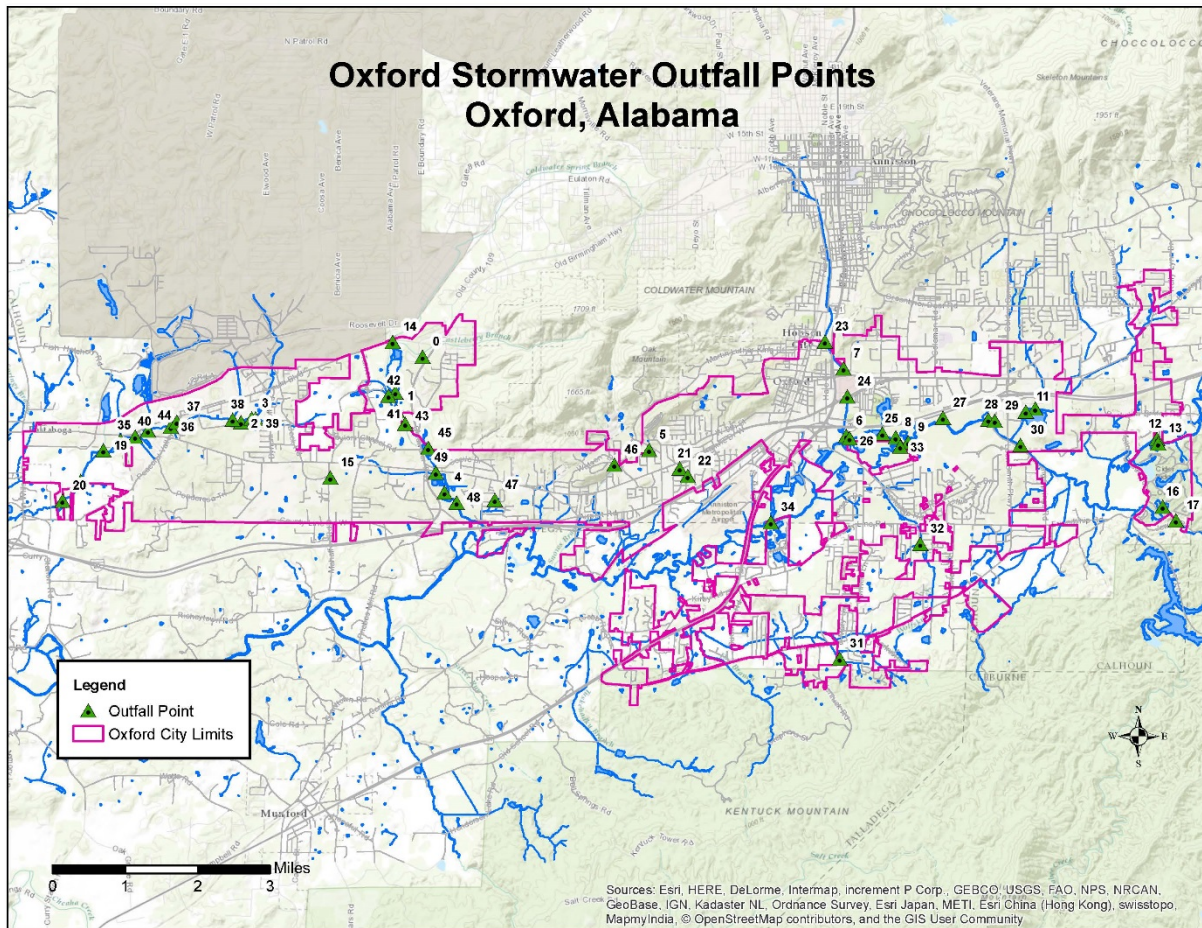


Figure 4 – Oxford Storm Water Outfall Points

B. Perform Field Assessments and Site Inspections

Current Program: Field assessments are observations made during the daily duties of the Building Department. Site inspections will include field visits outside of an employee's normal duties in response to reports of potential noncompliance, or as a result of program directives. Site inspections will be required at a minimum of once per month. These inspections are kept in a log and any violations will be reported immediately and proper paperwork completed. A process has been established for each of the designated field personnel to report non-storm water discharges. This process includes reporting potential violations to the appropriate City staff. Currently, City staff routinely inspects the storm water infrastructure. Staff responds to notifications of potential illicit discharges from the public and other agencies. Citizens can report illicit discharges/illegal dumps to the Building Department via phone (256-831-9685) or through the Oxford 311 link on the City's website. The Building Department responds to each of these reports and investigates accordingly. These complaints are also kept in a log to ensure that they have been addressed.

The City of Oxford will notify ADEM of an Illicit Discharge that is the result of a neighboring MS4. Contact information for ADEM is listed below:

Alabama Department of Environmental Management
Attention: Water Division
Stormwater Management Branch
PO Box 301463
Montgomery, AL 36130-1463
334-271-7700 (phone) 334-279-3051 (fax)
cswmail@adem.alabama.gov

To reduce the amount of pollutants in runoff, City crews regularly perform maintenance and cleaning on roadways, ditches, culverts, grounds, parks, and, channels. These practices will be described and recognized in appropriate parts of the program.

Measurable Goals: Throughout the implemented SWMP, the City will:

1. Continue to educate the general public and commercial and industrial developments on hazards associated with illegal discharges.
2. Continue to implement an ordinance that provides the City with the enforcement power to address any illicit discharges and illegal dumps and allow a yearly review of the ordinance. The Illicit Discharge Detection & Elimination Ordinance is included in Appendix B of this report.
3. Continue basic field assessments to establish priority areas for the more focused inspections. Once priority areas are established, the City will be able to better track potential illicit discharges and eliminate them. A copy of the Illicit Discharge Detection & Elimination Standard Operating Procedures are included in Appendix C of this report.
4. Respond per established procedures to all identified and reported potential illicit discharges and connections.

Responsible Departments: Building Department, Fire Department, Street Department, and Water Works & Sewer Board.

C. Hazardous Materials Response Program

Current Program: The storm water program will be coordinated with the existing hazardous materials response program operated by the City's Fire Department. The Building Department, Street Department and other entities that coordinate with the hazardous materials response program will assist in this effort. Oxford Fire Department currently operates an existing hazardous materials response program in coordination with the Calhoun County Emergency Services. Public inquiries and reports regarding illicit discharges can be made via the Oxford 311 link on the City's Environmental Web Page.

Measurable Goals: During years 2017 through 2021 of the implemented SWMP, the City will:

1. Continue to advertise IDDE information on the City Webpage, in educational brochures/flyers and through local media/radio. Receive, respond and report appropriately to all reported events or inquiries fielded from the public.

Responsible Departments: Building Department, Fire Department, Police Department, Street Department, and Water Works & Sewer Board

D. Train City Staff

Current Program: The goal of this element is to assure that the City staff understand storm water issues and works, and other employees. These training sessions may be offered in conjunction with other training elements of the program.

Measurable Goals: In 2017 of the implemented SWMP, the City will:

1. Develop a training presentation for new hires on basic storm water issues
2. Develop a training presentation for new hires on IDDE

In years 2018 through 2021 of the implemented SWMP, the City will

3. Provide one general storm water training session annually for new employees involved in program.
4. Provide specific training yearly for all employees with program responsibility such as street, and mowing crews

Responsible Departments: Building Department and Street Department

Evaluation Techniques: The evaluation of a MCM 3 program is best measured by the goals that are met. At the end of the permit year, the City will evaluate the overall effectiveness of MCM 3 through assessment of the success of the goals that were achieved.

3-4 Construction Site Storm Water Runoff

Permit Requirement

The Construction Site Storm Water Runoff Control (MCM 4) requires the development, implementation

and enforcement of a program to reduce, to the maximum extent practicable, pollutants in any storm water runoff to the MS4 from construction activities that result in a total land disturbance of greater than or equal to one acre and activities that disturb less than one acre but are part of a larger common plan of development or sale that would disturb one acre or more. ADEM terms these sites as qualified construction sites.

Target Audiences

MCM 4 will target developers, contractors, home builders and professional consultants. MCM 4 will include the training of City staff from the Building Department. Federal, state and county agencies will also be included through coordinated efforts within the program.

Targeted Pollutants and Sources

MCM 4 will mainly target construction sites for erosion and sediment control. Other potential targeted pollutants and sources are petroleum, oils and greases from equipment storage areas, pathogens from lack of portable facilities and pH changes through concrete washouts.

Outreach Strategy, Goals and Timeline

The City will employ a variety of strategies for MCM 4 from training City building inspectors to implementing and enforcing an erosion and sediment control program through City ordinances. The City will rely upon ADEM standards for appropriate erosion and sediment controls for qualified construction sites. The Control of Erosion Siltation Ordinance has been developed and approved by the City Council to give the City the authority to enforce and ensure compliance. Any non-compliant construction sites will be shut down immediately until the BMPs can be brought up to ADEM standards. ADEM will be notified of the non-compliant construction sites within 48 hours. Each strategy will be detailed below along with its goal and timeline and department responsible for implementation of measure.

A. Residential Erosion and Sediment Control Ordinance

Current Program: The Control of Erosion Siltation Ordinance has been developed and approved by the City Council to give the City the authority to enforce and ensure compliance. This ordinance regulates land disturbances that exceed an area of exposed soils associated with land disturbance with the exception of agricultural operations. The Control of Erosion Siltation Ordinance is on the City's Environmental Outreach website and is included in Appendix D of this report.

Measurable Goals: During the remainder of the permit cycle, the ordinance would go through an annual review and comment period. During the remainder of the permit cycle, following any updates to the Erosion and Sediment Control Ordinance, the BMP checklist would also be updated.

Responsible Departments: Building Department, City Council

B. Commercial Land Use and Development Ordinance

Current Program: For all new and re-developments within the City of Oxford corporate limits, an erosion and sediment control plan is required to be designed and submitted by a qualified credentialed professional (QCP). This plan is reviewed and approved by the Building Department and then forwarded to the City Council for approval. Components of the plan have to meet and/or exceed the Alabama Handbook for Best Management Practices for Erosion and Sediment Control, most current edition (Alabama Handbook) and ADEM permit requirements. If for any reason, additional state and federal permits are required, such as an ADEM NPDES or US Corps wetland permit, the City will not issue the site a land disturbance permit or building permit until proof of the federal or state permit is submitted to the City. Sites are inspected along with building inspections for compliance with the ordinance. Enforcement mechanisms include written warning letters, stop work orders and municipal fines through the issuance of municipal offense tickets.

Measurable Goals: During the implemented SWMP, the City will review 100% of all submitted new and re-development erosion and sediment control plans. The City requires all contractors to submit monthly reports for the storm water permits.

Responsible Department: Building Department, City Council

C. Erosion and Sediment Control Training for City Building Inspectors

Current Program: All City Building Inspectors are required to receive annual training through the ADEM's Qualified Credential Inspector Program. This training gives the inspectors the knowledge needed to effectively monitor single family residential and commercial construction sites for erosion and sediment controls and storm water runoff concerns.

Measurable Goals: In years 2017 through 2021 of the implemented SWMP, the annual training required to keep building inspectors current in their certifications will be continued.

Responsible Department: Building Department

D. Commercial and Residential Construction Site Inspections and Enforcement

Current Program: Inspections of all construction sites are an integral part of MCM 4. Prior to the start of any land disturbance on a qualified construction site, the developer must submit their ADEM construction general permit authorization. The City maintains an inventory of all qualified construction sites within the MS4 area. Currently, all qualified construction sites are inspected a minimum of monthly during the construction process. During the inspection, all discharge points are inspected, and the site conditions are compared to the approved erosion and sediment control plan. Any deficiencies are noted and reported to the site manager and/or the developer. The developer has 48 hours to correct all deficiencies from the inspection or face a stop work order until they are corrected. The construction site is not completed until all areas are permanently stabilized, all construction debris removed and temporary sediment control structures removed. A final inspection is required prior to

release from the permit. Documentation of the inspections are kept on file at the Building Department offices.

Enforcement varies based on the severity of the deficiencies. Minor concerns will receive a written or verbal warning requiring 48 hours to comply with the ordinance. If not corrected or there are major deficiencies, the City may stop work on the construction site. Stop work orders are typically issued on sites with active construction while BMP deficiencies still exist. When an erosion or sediment control complaint regarding a construction site is received, immediate action is taken by the Building Department to inspect, document and resolve the compliance issue using enforcement if needed.

The City will notify ADEM, either by phone or email, of any construction sites where a possible violation of the Clean Water Act has occurred. Possible violations could include, but are not limited to: unpermitted land disturbance activities, activities causing uncontrolled release of sediment to a water of the State/U.S., and/or failure to adhere to the City's corrective action request following an inspection. Concerned citizens can provide information regarding potential erosion and sediment control concerns through the Oxford 311 link on the City's website. The City will respond to each concern in a timely and efficient manner.

Contact information for ADEM is listed below:

Alabama Department of Environmental Management
Attention: Water Division
Stormwater Management Branch
PO Box 301463
Montgomery, AL 36130-1463
334-271-7700 (phone) 334-279-3051 (fax)
cswmail@adem.alabama.gov

Measurable Goals: In 2017, site inspections will be prioritized based on status of construction, site conditions, location and size of site and proximity of site to sensitive areas such as streams and wetlands. Priority construction sites include qualified construction sites that discharge to an impaired water listed for sediment or an Outstanding Alabama Water. Priority construction sites will receive precedence in inspections.

In 2018, the City's goal is to enhance the database used to track all inspections and timelines for site compliance. In year 2019 through 2021 of the implemented SWMP, the City will determine the overall effectiveness of the program and modify as needed for permit compliance of the implemented SWMP.

Responsible Departments: Building Department and Engineering Department

D. Construction Associated with Sensitive Areas

Current Program: The City requires that all bulkheads, retaining walls, etc. within its corporate limits possess approved federal and state permits prior to issuance of any land disturbance and/or building permit. After the permitting process, the site is inspected during construction and a final inspection is

performed upon completion to ensure that there are no adverse environmental impacts that have occurred during construction.

Measurable Goals: The City plans to continue the implementation of this review process. In 2019, the goal would be to review the inspection process to determine if additional inspection requirements are warranted for these sites. These inspections would be documented as all other construction inspections. Also, any major deficiencies observed will be reported to the appropriate federal or state agency.

Responsible Department: Building Department

Evaluation Techniques

The evaluation of the program will include the achievement of the program goals. Also during the permit term, the effectiveness of the program will reveal itself based on construction site compliance. The results of the program will be evaluated annually and documented in the annual report.

3-5 Post Construction Storm Water Management in New and Re-Development

The City will employ a variety of strategies for MCM 5 from enforcement of ordinances to education outreach. The City's goal is to minimize water quality impacts from new development and re-development sites. Each strategy will be detailed below along with its goal:

Permit Requirement

The City will develop, implement, and enforce a program to address storm water runoff from new development and re-development projects that disturb greater than or equal to one acre by insuring that controls are in place that would prevent or minimize water quality impacts. Oxford will develop and implement strategies, which include a combination of structural and/or non-structural BMPs appropriate for the community.

A Post Construction Storm Water Runoff Ordinance has been passed by the City Council to address post-construction runoff from new development and redevelopment projects to the extent allowable under State or local law. This Ordinance is located in Appendix E of this Report. The Ordinance follows all of the stipulations as required in the NPDES Permit relating to Post Construction Runoff.

The City will ensure adequate long-term operation and maintenance of BMPs until the issue of construction runoff is resolved.

Target Audiences

MCM 5 will target developers, contractors, and property owners' associations.

Target Pollutants and Sources

Non-point source pollutants found in storm water will be targeted by MCM 5. These pollutants include, but are not limited to, sediment, paints, fertilizers, pesticides, swimming pool discharges, pathogens and

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, unpermitted construction site discharges, improper disposal of fertilizers, pesticides, and herbicides, paints, etc.

Strategies, Goals and Timelines

The City will employ a variety of strategies for MCM 5 from enforcement of ordinances to education outreach. The City's goal is to reduce water quality impacts from new development and re-development to the maximum extent practicable. Each strategy will be detailed below along with its goal, timeline and department responsible for implementation of measure.

A. Perform Field Evaluations and Long-term Maintenance and Monitoring of BMPs

The goal of this element is to periodically review and assess the performance of the post-construction BMPs installed with new and re-development projects. Field inspections verifying the adequate construction of the BMPs in accordance with the approved improvement plans will be performed along with permit cycle inspections. The field inspections will include an evaluation of the BMP's and how well the BMP has been maintained since construction. Performance and potential improvements will be noted. If possible, the BMPs will be viewed while functioning during a rainfall event. Information gathered with this element will be used to revise acceptable BMPs and processes. If revisions are required, contractors will be required to submit a revised BMP plan for review and approval. Once approved and installed, the new BMPs will be monitored monthly and after storm events. The list of Post Construction BMP Inventory is included as Table 2 below.

Measurable Goals: In 2017, the City will update, as needed, design review guidance for plan reviewers.

Throughout the permit cycle, the City will review all of the post construction BMP'S annually, evaluate performance and design, and report the results in the annual reports and conduct enforcement as required to ensure compliance. Maintenance agreements are currently being developed and will be in use by June 2019 to help monitor post construction BMPs with contractors and developers.

Responsible Departments: Building Department

Table 2 – Post Construction BMP Inventory

Oxford Police Station	1 Pond
Oxford Library	1 Pond
Oxford City Hall	1 Pond
Oxford Public Works Building	1 Pond
Fire Stations #2, #3, #4, #6	1 Pond at Each Station
Bynum Community Center	1 Pond

B. Low Impact Development/Green Infrastructure Ordinance

Current Program: Low-Impact Development (LID) is a term used to describe a land planning and engineering design approach to managing storm water runoff. LID emphasizes conservation and use of on-site natural features to protect water quality. This approach implements engineered small scale

hydrologic controls to replicate the predevelopment hydrologic regime of watersheds through infiltrating, filtering, storing, evaporating, and detaining runoff close to its source.

Green Infrastructure is a concept that highlights the importance of the natural environment in decisions about land use planning. In particular there is an emphasis on the “life support” functions provided by a network of natural ecosystems with an emphasis on interconnectivity to support long term sustainability. EPA has extended the concept to apply to the management of storm water runoff at the treat polluted runoff.

Measurable Goals: In 2018, the City will survey local consultants and citizens to aid in the development of a Low Impact Development/Green Infrastructure Ordinance.

In years 2019 through 2020, the draft ordinance will be presented to City departments for internal review. Once the comments are addressed from the internal review, the new ordinance will be taken to the City Council for review and adoption.

In 2021, the ordinance will be implemented.

Responsible Departments: Building Department, Parks & Recreation Department

C. Perform Education Outreach for the Development Community

Education and outreach is required to assure that the development community is informed about the program and correct design standards to minimize pollutants discharged in storm water runoff. Outreach activities will include distribution of existing or new education materials in conjunction with the Public Education and Outreach MCM, and sponsorship of workshops targeted to the development community.

Measurable Goals: Throughout the implemented SWMP, the City will create new or gather existing available outreach materials from local agencies to have available for contractors and the general public at specific locations determined under the Public Education/Outreach MCM. These materials will also be available to view on the City’s Environmental Outreach website.

Responsible Department: Building Department, Water Works & Sewer Board

Evaluation Techniques

The evaluation of a MCM 5 program is best measured by the goals that are met. At the end of the permit year, the City will evaluate the overall effectiveness of MCM 5 through assessment of the success of the goals that were achieved.

3-6 Pollution Prevention/Good Housekeeping for Municipal Operations

Permit Requirement

Pollution Prevention/Good Housekeeping for Municipal Operations (MCM 6) requires the City to develop and implement a program for pollution prevention and good housekeeping at municipal

operations. It also requires the development and implementation of an employee training program designed to prevent and reduce storm water pollutants, to the maximum extent practicable, in areas such as parks maintenance, fleet and building maintenance, new construction and land disturbances, storm water system maintenance, and all other applicable municipal operations.

The program must list all municipal operations and industrial activities that are impacted by this operation and maintenance program. The training program shall be coordinated with the public outreach programs for storm water pollution and illicit discharges. The program shall include maintenance activities, schedules and long-term inspection procedures for controls to reduce floatables and other pollutants to the MS4. The program shall also address controls for reducing or eliminating the discharge of pollutants from streets, roads, highways, municipal parking lots, maintenance and storage yards, waste transfer stations, recycling collection centers, fleet or maintenance shops with outdoor storage areas and fill dirt storage areas.

Procedures shall be outlined 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. There will also be procedures to ensure that new flood management projects are assessed for impacts on water quality and existing projects are assessed for incorporation of additional water quality protection devices or practices.

Target Audiences

MCM 6 will target municipal operations which include municipal employees and elected officials. Federal, state and county agencies will also be included through coordinated efforts with the program.

Targeted Pollutants and Sources

MCM 6 will target all non- point source pollutants found in storm water. These pollutants include, but are not limited to, sediment, trash, fertilizers, pesticides, pathogens, and oils and greases. The targeted sources are municipal operations and facilities and publicly owned properties and rights-of-way.

Outreach Strategies, Goals and Timelines

The City will employ a variety of strategies for MCM 6, but will identify strategies into two separate categories; Pollution Prevention and Good Housekeeping.

A. Pollution Prevention

Pollution prevention includes measures that involve rights-of-way, including bridges, storm water management systems and roadways. Standard Operating Procedures for Pollution Prevention/Good Housekeeping for Municipal Operations can be found in Appendix F. This section includes the following measures for compliance with the permit requirements:

City of Oxford Storm Water Management Plan

1. City Facility Recycling Program
2. Storm Water Management System Maintenance Program
3. Litter Patrol
4. Capital Storm Water Projects
5. Fats, Oils & Grease Program

Measurable Goals:

1. City Facility Recycling Program: The City municipal building will be equipped with recycling containers for paper, aluminum, plastic and cardboard. Employees are expected to recycle all these wastes with the exception of confidential documents. Confidential documents are shredded and recycled through a private company. Furthermore, the City will implement recycling containers for plastic bottles and aluminum cans at our Sports Fields and during all festivals and events held in City parks. Depending on the company contracted, the recyclables will be picked up biweekly and/or after festivals and sporting events. Throughout the implemented SWMP, the City will continue to find areas to place recycling containers in order to encourage the recycling program.

2. Storm Water Management System Maintenance Program: The storm water management system for the City contains grassed and concrete swales, culverts, inlets and pipes.

Throughout the implemented SWMP, Public Works will continue to maintain areas on an as-needed basis. Areas will also be maintained when valid complaints of drainage problems are filed with the City. Major areas of storm water management system maintenance will be tracked through capital storm water projects.

3. Litter Patrol: The City operates and maintains its streets and right of ways in a manner to minimize discharge of pollutants. The City's Public Works Department has a litter collection program in effect. Prior to weekly mowing, designated crews pick up trash weekly from the City's ROW. Any severe ROW erosion noted during mowing is repaired in a timely manner. Grassed ditches serve as storm water filters during rain events.

Throughout the implemented SWMP, the City will continue to monitor areas for litter.

4. Capital Storm Water Projects: Each new budget year the City determines a list of capital projects. The Mayor's Office and Building Department is the lead in this effort. These projects normally include a tremendous amount of funding and hiring an outside engineering firm and outside contractor. Each year these projects are proposed to the City Council and Mayor for approval. If approved, they are budgeted for the following year. Some of these projects may be emergency repairs due to natural disasters. Emergency projects are completed as soon as practicable for the safety of the public.

Throughout the implemented SWMP, all capital storm water projects will be monitored for compliance with the City's proposed erosion and sediment control ordinance.

Inspections of these projects will be conducted as for all qualified construction sites. Any deficiencies will require immediate attention and compliance.

5. Fats, Oils & Grease Program: The Oxford Water Works & Sewer Board has implemented a Fats, Oils & Grease Program, where all grease traps within the City are inventoried, inspected regularly, maintained, and pumped as required. Restaurants and other food service establishments must obtain a FOG permit through the City in order to operate within the City. Documentation for the Fats, Oils & Grease Program is included in Appendix G.

Responsible Departments: Mayor, City Council, Building Department, Street Department

B. Good Housekeeping

Good Housekeeping includes measures that involve City owned facilities. This section includes the following measures for compliance with the permit requirements:

1. Inventory of Facilities
2. Assessment of Facilities
3. SWMP Standard Operating Procedures (SOP) for Facilities
4. Engineering Department ADEM Permits

Measurable Goals:

1. Inventory of Facilities – The City has completed its inventory of municipal facilities in Table 3 to aid in the identification of possible pollutants from storm water runoff. This inventory includes buildings, parks, vacant property, parking areas and ancillary storage areas.
2. Assessment of Facilities – All facilities that were inventoried will have an updated assessment by the end of the permit cycle and on a yearly basis thereafter. Any new municipal facility will be added to the master list with any possible pollutants identified. During the regular inspections, all deficiencies will be identified and reported to the appropriate supervisor for remediation. Inspections of the municipal facilities with possible pollutants will then be completed on a monthly basis.
3. SWMP SOPs – Following the assessment, each facility will develop standard operating procedures (SOPs) in regard to storm water runoff and housekeeping practices.
4. Engineering Department ADEM Permits – During the implemented SWMP, the Engineering Department will have a record of all outstanding ADEM permits, correspondence, renewal dates, etc. in order to keep current on all permit requirements.

Responsible Departments: Building Department, Engineering Department, Fire Department

Training is essential for all City employees regarding pollution prevention and good housekeeping. Previous MCMs detail specific training programs that will be developed and implemented. The City will also develop a training program for the purpose of educating employees regarding storm water runoff and pollution prevention. This training may be a part of other MCM training. All training in regards to the Storm Water Management Plan will be kept in a log and reported each year in the Annual Report.

During the implemented SWMP, the City will:

1. Continue a training program for new hires on IDDE, Pollution Prevention and Good Housekeeping.
2. Provide one general storm water training session annually for new employees involved in program.

3. Provide specific training in regard to facility SOPs yearly for all employees with program responsibility.

Responsible Departments: Building Department and all other City Departments

Evaluation Techniques

The evaluation of the program will include the achievement of the program goals. Also during the permit term, the effectiveness of the program will reveal itself based on actual pollutant amount removal from the storm water management system. The results of the program will be evaluated annually and documented in the annual report.

Table 3 – Inventory of Municipal Facilities

No.	Name	Location	Possible Pollutants
1	Oxford City Hall	145 Hamric Drive East	None
2	Oxford Public Library	110 East 6 th Street	None
3	Oxford Performing Arts Center	100 East Choccolocco Street	None
4	Oxford Street & Public Works Department	42 Public Works Drive	None
5	Oxford Police Station	600 Stanley Merrill Drive	Fuel Pump Onsite
6	Oxford City Garage	48 Public Works Drive	Fuel Pump Onsite, Oil & Used Oil
7	Choccolocco Park Sports Complex	954 Leon Smith Parkway	Fuel Pump Onsite
8	Cider Ridge Golf Course	200 Apple Blossom Way	Fuel Pump Onsite
9	Oxford Civic Center	401 McCullars	None
10	Friendship Community Center	2930 Friendship Road	None
11	Bynum Community Center	200 Victory Drive	None
12	Senior Center Building	424 Main Street	None
13	DeArmanville Elementary School	170 School Road	None
14	Oxford Elementary School	1401 Caffey Drive	None
15	C.E. Hanna Elementary School	1111 Watson Drive	None
16	Coldwater Elementary School	530 Taylors Chapel Road, Anniston	None
17	Oxford Middle School	1750 U.S. Hwy 78 West	None
18	Oxford High School	#1 Yellow Jacket Drive	None
19	Fire Station #1 Dewey D. Webb	70 East 6 th Street	None
20	Fire Station #2 Robert Hendricks	1223 Friendship Road	None
21	Fire Station #3 Dennis M. Cox	56 Bynum Cut-Off Road	None
22	Fire Station #4 Earl P. Haynes	48476 Alabama Hwy 21 South	None
23	Fire Station #5 H. Kenneth Henson	52 DeArmanville Road	None
24	Fire Station #6 Capt Lynn Elliott	71 Public Works Drive	None
25	Fire Training Facility	65 Public Works Drive	None

Chapter 4-Water Quality Monitoring Plan

As mentioned earlier in the SWMP, one of Oxford's streams failed to meet the minimum water quality standards for their designated Fish and Wildlife use. ADEM has listed Choccolocco Creek on its 303(d) list as impaired for fish consumption due to mercury. The 303(d) List is a compilation of impaired waters that require the establishment of a Total Maximum Daily Load (TMDL) under the Clean Water Act. The TMDL is a calculation of the maximum amount pollutant that a water body can receive and safely meet water quality standards. The City of Oxford lies within the Coosa River Watershed which has an approved TMDL for nutrients (total phosphorous) and organic enrichment – NBOD.

Permit Requirements

Upon monitoring plan approval by ADEM, the City will monitor specified storm water outfall locations for nutrients and organics. Storm water quality sampling locations have been determined and are listed below in Table 4 and are shown in Figure 5. Samples taken for the purpose of monitoring shall be representative of the monitored activity. All test procedures will be conducted in accordance to test procedures approved by EPA under 40 CFR Part 136 and Oxford's Standard Operating Procedures for sampling these locations are located in Appendix H.

Records of monitoring information shall include:

- a. The date, exact place, and time of sampling measurements
- b. The name of the individual who performed the sampling or measurements;
- c. The date(s) analyses were performed;
- d. The names of the individual who performed the analysis;
- e. The analytical techniques or methods used;
- f. The 48-hour rainfall amount (taken from daily measurements at the Oxford Tull C. Allen Wastewater Treatment Plant); and
- g. The results of such analyses

Monitoring results will be reported with the SWMP Annual Report.

Target Pollutant

Nutrients and organics will be the targeted pollutants for the City's Water Quality Monitoring Program.

Outreach Strategies, Goals and Timelines

City Water Quality Monitoring Plan

One of Oxford's streams failed to meet the minimum water quality standards for their designated Fish and Wildlife use. ADEM has listed Choccolocco Creek on its 303(d) list as impaired for mercury and PCBs (which will be monitored in other ways). The City of Oxford lies within the Coosa River Watershed, which has an approved total maximum daily load (TMDL) for Nutrients (Total Phosphorous) and Organic Enrichment.

As part of Oxford's Water Quality Plan, the following sampling locations (Table 4) have been chosen to be sampled on a quarterly basis for the temperature, pH, dissolved oxygen, turbidity, total Kjeldahl nitrogen, and phosphorous. A map of the sampling locations is shown in Figure 5.

Measurable Goals:

In 2017, the City will sample the specified locations quarterly for nutrients and organics. In years 2018 through 2021, the City will modify its sampling locations and/or protocol based on the data collected during previous years. All monitoring results will be submitted to ADEM as part of the City's Annual SWMP Report. In the future, the City of Oxford would like to be able to display these locations with the associated water quality results online for public access.

Responsible Departments: Building Department, Water Works & Sewer Board

Table 4 – Water Quality Sampling Locations and Parameters

Sampling ID	Latitude/ Longitude	Location Description	Downstream of Outfall Points/Sample Locations	Parameters to be Monitored
001	33.6000637 -85.757254	Choccolocco Creek at Mellon Bridge Road	12 and 13	Temperature, pH, Dissolved Oxygen, Turbidity, Total Kjeldahl Nitrogen, and Phosphorous
002	33.6024422 -85.7861765	Choccolocco Creek at Leon Smith Parkway	Sample 001, 16, 17, 10, 11, 30	Temperature, pH, Dissolved Oxygen, Turbidity, Total Kjeldahl Nitrogen, and Phosphorous
003	33.6003661 -85.8278673	Choccolocco Creek at Friendship Road	Sample 001, 002, 6, 7, 8, 9, 23, 24, 25, 26, 27, 28, 29, 33	Temperature, pH, Dissolved Oxygen, Turbidity, Total Kjeldahl Nitrogen, and Phosphorous
004	33.5849928 -85.8475407	Choccolocco Creek at Highway 21	Sample 001, Sample 002, Sample 003, 32, 34	Temperature, pH, Dissolved Oxygen, Turbidity, Total Kjeldahl Nitrogen, and Phosphorous
005	33.585889 -85.9127897	Coldwater Creek at Airport Road	0, 1, 4, 14, 41, 42, 43, 45, 47, 48, 49	Temperature, pH, Dissolved Oxygen, Turbidity, Total Kjeldahl Nitrogen, and Phosphorous
006	33.5877092 -86.021539	Eastaboga Creek at John Wills Avenue	2, 3, 19, 20, 35, 36, 37, 38, 39, 40, 44	Temperature, pH, Dissolved Oxygen, Turbidity, Total Kjeldahl Nitrogen, and Phosphorous

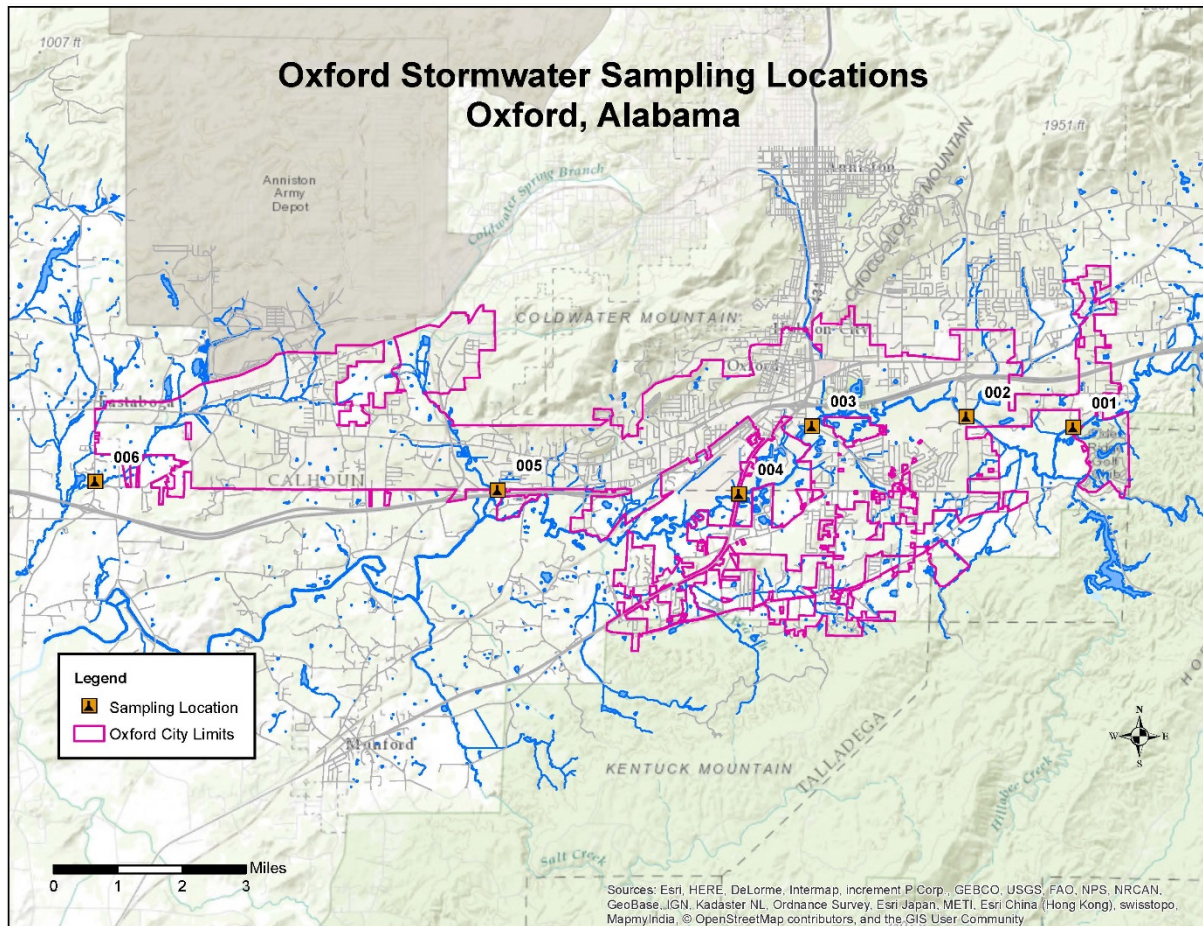


Figure 5 – Water Quality Sampling Locations

Chapter 5-Record Keeping and Reporting

The State's general permit requires the submission of an Annual Report. Annual Reports are due on May 31st of each year during permit term. These reports must be certified by the governing body or an official designated by the governing board. At a minimum, the annual reports will contain the following information:

- Status of compliance with permit conditions;
- An assessment of the appropriateness and effectiveness of the identified BMPs;
- Status of the identified measurable goals of reducing the discharge of pollutants and protecting water quality.
- Results of information collected and analyzed, including monitoring data, if any, during the reporting period;
- A summary of the storm water activities the City of Oxford plans to undertake during the next reporting cycle;
- An assessment of the appropriateness and effectiveness of the identified BMPs;
- Any proposed change(s) to the SWMP along with a justification why the change(s) are necessary; and
- A change in the person or persons implementing and coordinating the SWMP.

The Building Department Manager is responsible for assembling information from the various City departments to author the annual reports. Forms for use in recordkeeping by involved departments will be developed to facilitate collection of the information required for the annual reports.

The City will keep records required by the permit for at least five years, or the duration of the permit. The records used to document compliance with the SWMP will be available to the public during regular business hours from the various implementing departments. The SWMP and related documents may be viewed in the Building Department, 145 Hamric Drive East, Oxford, Alabama 36203 or on the City's website under Environmental Outreach.

Appendices

Appendix A - Oxford Comprehensive Plan

Appendix B – Illicit Discharge Detection & Elimination Ordinance

Appendix C – Illicit Discharge Detection & Elimination Standard Operating Procedures & Dry Weather Screening Form

Appendix D – Control of Erosion Siltation Ordinance

Appendix E – Post Construction Storm Water Runoff Ordinance

Appendix F – Pollution Prevention/Good Housekeeping Standard Operating Procedures & Municipal Facilities Inspection Form

Appendix G – Fats, Oils & Grease Program Documents

Appendix H – Water Quality Sampling Standard Operating Procedures