

UNIVERSITY OF NORTH ALABAMA
MUNICIPAL SEPARATE STORM SEWER (MS4)
STORM WATER MANAGEMENT PROGRAM
ANNUAL REPORT

April 1, 2023 – March 31, 2024

NPDES Permit No. ALR040063

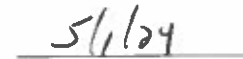
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Certification Statement

I certify under the 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 gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



Evan Thornton, CFO
Vice President,
Business and Financial Affairs



Date

- i. Primary Contacts – University of North Alabama, 1660 Tune Ave., Florence, AL 35630
 - Angela Zwissler – Director, Environmental Health and Safety, 256-765-4804, azwissler@una.edu
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- ii. Overall evaluation of the Storm Water Management Program developments and progress
 - a. Major accomplishments
 - i. UNA was able to increase employee participation training. Environmental Services staff will now participate in Storm Water Management Plan Training and all affected employees will complete training annually.
 - b. Overall program strengths/weaknesses
 - i. Strengths
 1. UNA has motivated and dedicated leadership to ensure the overall success of the Storm Water Management Program Plan.
 2. UNA works in collaboration with the City of Florence to support each other's Storm Water Management Programs.
 3. UNA employs a Grounds crew and their duties include daily outdoor litter collection.
 4. UNA employs a certified Ornamental & Turf Pest Control Supervisor (OTPS) to conduct and supervise the application of pesticides and herbicides.
 5. UNA has a recycling program.
 6. The campus' Director of Environmental Health and Safety is on the Board of Directors for *Keep The Shoals Beautiful*.
 - ii. Weaknesses
 1. Turnover in key positions can limit the ability to maintain constant growth.
 2. Obtaining accurate rosters from Community Involvement activities is sometimes a challenge.
 - c. Future direction of the program
 - i. UNA is striving to find additional opportunities to involve more campus and community personnel. Strengthening the partnership with the Muscle Shoals National Heritage Association (MSNHA) and Keep The Shoals Beautiful are focus areas. Partnering with the City of Florence's Recycling Department as a training partner is expected to increase the number of individuals trained.
 - d. Overall determination of the effectiveness of the Storm Water Management Program Plan regarding water quality/watershed improvements.

Figure 1



3. Public Involvement Activities to Address the Reduction Litter, Floatables, and Debris
UNA groups sponsored and participated in several public involvement activities which are listed in Table 1 on the next page. Participants included members from a variety of campus student organizations and departments.
 - i. The targeted pollutant sources include litter, sediment, and oil.
 - ii. Target populations include campus students and residents, employees, and the surrounding community.

Table 1

Event Title, Date	Achievements
Cypress Creek Pickup and Paddle, June 10, 2023	57 UNA and community participants
Tennessee River Litter Tournament, September 16, 2023	115 UNA and community participants
City-Wide Clean Up Day, March 16, 2024	195 UNA and community participants



Tennessee River Litter Tournament Participants, September 16, 2023

- vi. A variety of brochures and posters are posted on campus bulletin boards on campus. These communication methods can be found at <https://www.una.edu/facilities/environmental-health-and-safety/storm-water-management.html> (bottom of page). A total of 10 education/awareness posters were distributed to campus bulletin boards.

Evaluation of the Effectiveness of the Control: This minimum control measure is effective. The partnership with the Muscle Shoals National Heritage Association helped to improve campus and community involvement through an increase in the number of sponsored clean up events. This Minimum Control Measure allowed for frequent and meaningful activity related to UNA's Storm Water Management Program Plan. No BMP revisions are planned for this measurable goal.

- b. **Illicit Discharge Detection and Elimination (IDDE) Program**
 - i. The map of campus outfalls is found in Attachment 1.

ii. UNA conducted dry weather screening at all (4) outfalls, listed below, each with a discharge to Unnamed Tributary to Cypress Creek:

- Grounds/Environmental Services Building(1)
- Parking Lot W, Cedar St. (1)
- East Campus (2)

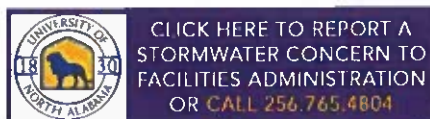
Dry Weather Screening indicates that no pollutants were observed being discharged at the outfalls. The Dry Weather Screening Form is located in Attachment 2.

iii. The IDDE regulatory mechanism was reviewed and no changes were necessary. It is located in the Illicit Discharge Detection and Elimination folder on the Storm Water Management page: <https://una.edu/facilities/environmental-health-and-safety/storm-water-management.html>.

iv. All new and affected Facilities Department personnel (Maintenance and Grounds Departments) were trained on the identification, reporting, and corrective actions of illicit discharges by taking *UNA's Storm Water Management Plan Training*. The training also covers details of UNA's Storm Water Management Program Plan and describes ways to reduce and eliminate pollution. All existing employees were trained less than 5 years ago. Training for new Facilities Dept. employees was completed on the following dates:

- 2023: October 5 and 30; November 19, 23 and 29
- 2024: March 12

The Storm Water Management Program training informs the trainees of the negative consequences associated with illicit discharges and improper disposal of waste. The concerned person can either call Facilities Administration and Planning at 256-765-4804 or send an email by clicking on the link shown below on the Storm Water page on the UNA website (<https://una.edu/facilities/environmental-health-and-safety/report-a-storm-water-concern.html>).



There were no investigated illicit discharges during this reporting cycle

Assessment of the Control: This minimum control measure was determined to be effective. To expand the knowledge base on campus, the following changes are being made: a) all Facilities employees (e.g., Grounds, Maintenance, Project Managers, and Environmental Services) will participate in *UNA's Storm Water Management Plan Training*.

c. **Construction Site Storm Water Runoff Control**

i. The applicable regulatory mechanism is outlined in the Division of Construction Management guidelines (https://dcm.alabama.gov/PDF/forms/C-8_Gen_Cond.pdf). No revisions occurred or are planned.

ii. Active construction sites and # of inspections during the reporting period:

Project	Permit #/ (Termination Date, if applicable)	# of construction site inspections	# non- compliant construction site referrals/ enforcement actions	# of construction site runoff complaints received	# of MS4 ² staff/ inspectors trained
UNA Mathma- tics Building	ALR10C2JM	ADEM ¹ - 0 QCI - 52 UNA - 12	0	0	0 during the active Permit

¹ADEM – Alabama Department of Environmental Management

² Municipal Separate Storm Sewer System

Contracted inspectors possess QCI qualifications.

Assessment of the Control: This minimum control measure was determined to be effective. Through the process of regular inspections and use of trained staff, UNA experienced no complaints or enforcement actions. No BMP revisions are planned for this measurable goal.

d. Post-Construction Storm Water Management in New Development and Redevelopment

- i. The applicable regulatory mechanism can be found outlined in the Division of Construction Management guidelines (https://dcm.alabama.gov/PDF/forms/C-8_Gen_Cond.pdf).
- ii. Post Construction Controls Inventory. There were no changes to the Inventory because no projects resulted in the installation of post-construction controls.
- iii. Post Construction Inspections. Two post-construction inspections of BMPs and controls were conducted at the following locations:
 - Subsurface detention chamber, Parking Lot M, Circular Rd. (1)
 - Detention Basin, Parking Lot W, Cedar St. (1)

Assessment of the Control: This minimum control measure was determined to be effective. No BMP revisions are planned for this measurable goal. There were no enforcement actions during this period.

e. Pollution Prevention/Good Housekeeping for Municipal Operations

- i. In March 2024, one inspection point was removed, item 9, LaGrange Hall’s Cooling Tower. The form, Attachment 3, will be updated in the upcoming reporting cycle to reflect the change.

Table 2 - List of Municipal Facilities Inspected

- | | |
|------------------------------------|--|
| 1. 541 College St. | 10. Cooling Tower - Behind Mane Market |
| 2. Connie B. McKinney Center | 11. Cooling Tower - Wesleyan Hall |
| 3. Cooling Tower - Cramer Way | 12. Fuel Pumps |
| 4. Cooling Tower - Collier Library | 13. Grounds Dept. Equipment Storage |
| 5. Cooling Tower - ITS | 14. Parking Deck and Lots |
| 6. Cooling Tower - Flowers Hall | 15. Science Building Mechanical Room |
| 7. Cooling Tower - GUC | 16. Steam Plant |
| 8. Cooling Tower - Kilby School | 17. Vehicle Maintenance |
| 9. Cooling Tower – LaGrange Hall | |

ii. Estimate of Floatables Collected/Litter Reduction

Grounds Department personnel are assigned to specific campus areas and one of their daily duties is to pick up litter. UNA also has a recycling program. Recycling containers are located in most campus buildings and are set up for large volume events like outdoor concerts and move-in days at the residence halls. Small cans are available in classrooms and hallways and there are 86 large containers that are picked up each week by the City of Florence



Recycling Department. UNA estimates that 10% of their recyclables could end up as floatables (e.g., beverage bottles and metal cans). Through this effort and based on previous container weights, UNA estimates that we prevented 3,012 pounds of floatable material from entering the MS4.

iii. Inspections. Four quarterly *Inspections of Municipal Facilities with Potential to Discharge Pollutants via Storm Water Runoff* were conducted using the form in Attachment 3. During Quarter 1 of 2024, one inspection point was removed, LaGrange Hall's Cooling Tower. The form will be updated to reflect the removal of this inspection point.

iv. Good Housekeeping Standard Operating Procedures
The Standard Operating Procures were reviewed and it was concluded that no changes were necessary (<https://una.edu/facilities/environmental-health-and-safety/docs/standard-operating-procedures-for-good-housekeeping-stormwater-practices-2021.docx.pdf>).

Assessment of the Control: This minimum control measure was determined to be effective based on the outcome of quarterly inspections. No BMP revisions are planned for this measurable goal.

4. Additional Information Required for the Annual Report

- a. Summary table of the storm water controls that are planned/scheduled for the next reporting cycle.

Minimum Control Measure	Controls Planned/Scheduled
Public Involvement/Public Education	Continue to strengthen partnerships and seek additional methods to increase public education and public involvement.
Illicit Discharge Detection and Elimination	<ul style="list-style-type: none"> • Continue to maintain/keep current the training matrix which tracks training dates to ensure retraining happens at least every 5 years (<i>UNA's Storm Water Management Plan Training</i>). • Include the Facilities' Department Environmental Services employees in the training. • Survey construction sites at work's completion to determine if storm drain markers need to be replaced.
Construction Site Runoff Control	Through regular inspections and spot checks, continue to ensure that Best Management Practices follow the elements outlined in the Alabama Handbook for Erosion Control, Sediment Control and Storm water Management on Construction Sites and Urban Areas (https://www.dot.state.al.us/dsweb/divPed/Stormwater/pdf/AlabamaHandbookforErosionControl.pdf) and/or project-based CBMPP.
Post-Construction Management in New Development and Redevelopment	<ul style="list-style-type: none"> • Continue to develop and document the inventory of post-construction structural controls. • Ensure that a robust process exists for regular inspection and maintenance of post-construction structural controls as defined by the manufacturer, such as through a recurring preventive maintenance work order in the campus Work Order System, TMA.
Pollution Prevention/Good Housekeeping for Municipal Operations	<ul style="list-style-type: none"> • Through review and revision, ensure the municipal facility inventory and inspection processes accurately reflect campus activities, esp. after construction projects or renovations. • Revise the inspection form to reflect the removal of the LaGrange Hall Cooling Tower, Attachment 3, Item 8. • Ensure all new Municipal Operations personnel are trained on the Storm Water Management Program and Storm Water Standard Operating Procedures and are added to the Training Matrix.

- b. Results of information collected and analyzed, if any, during the reporting period.
- i. Not applicable.
- c. Notice of reliance on another entity to satisfy some of permit obligations.
- i. Not applicable.

- d. Results of the evaluation to determine whether discharges from any part of the MS4 contributes directly or indirectly to a waterbody included on the latest 303(d) list.
 - i. The Environmental Protection Agency's 303(d) List of Impaired Waterways identifies mercury as pollutant in Cypress Creek. UNA is not a contributor because mercury is atmospherically deposited by other regional sources. Therefore, UNA does not monitor its outfalls for mercury. We will continue to monitor 303(d) lists (<http://adem.alabama.gov/programs/water/303d.cnt>) on a quarterly basis to determine if UNA is a possible source for other pollutants

ATTACHMENT 1 – UNIVERSITY OF NORTH ALABAMA MAP OF OUTFALLS



ATTACHMENT 2 – ILLICIT DISCHARGE DETECTION AND ELIMINATION FORM

DRY WEATHER SCREENING FORM

Dry Weather Outfall Screening Form	
University of North Alabama	Time of screening:
Date of screening (MM/DD/YY):	Outfall Location:
Weather conditions: _____ Last Rainfall:	Outfall ID No.:
Sampling performed by:	

Outfall Description
Outfall Type/Material. Closed Pipe (check) <input type="checkbox"/> RCP <input type="checkbox"/> PVC <input type="checkbox"/> HPDE <input type="checkbox"/> Other Open Channel (check) <input type="checkbox"/> Concrete <input type="checkbox"/> Earthen <input type="checkbox"/> Grassy <input type="checkbox"/> Other
Receiving stream and watershed name
Land use/industries in drainage area
Latitude and Longitude

Field Observations and Measurements
Flow from Outfall? <input type="checkbox"/> Yes <input type="checkbox"/> No
Flow Description: <input type="checkbox"/> Trickle <input type="checkbox"/> Moderate <input type="checkbox"/> Substantial
Odor: <input type="checkbox"/> None <input type="checkbox"/> Sewage <input type="checkbox"/> Sulfide (rotten eggs) <input type="checkbox"/> Petroleum/gas <input type="checkbox"/> Rancid/sour <input type="checkbox"/> Other
Relative severity: <input type="checkbox"/> 0-None <input type="checkbox"/> 1-Faint <input type="checkbox"/> 2-Easily Detected <input type="checkbox"/> 3-Noticable from a distance
Color: <input type="checkbox"/> Clear <input type="checkbox"/> White <input type="checkbox"/> Gray <input type="checkbox"/> Orange/Rust <input type="checkbox"/> Red <input type="checkbox"/> Yellow <input type="checkbox"/> Green <input type="checkbox"/> Brown/Black <input type="checkbox"/> Other
Relative severity: <input type="checkbox"/> 0-None <input type="checkbox"/> 1-Faint <input type="checkbox"/> 2-Clearly visible in bottle <input type="checkbox"/> 3-Clearly visible in flow
Sediment/turbidity: <input type="checkbox"/> None <input type="checkbox"/> Cloudy <input type="checkbox"/> Opaque <input type="checkbox"/> Silty <input type="checkbox"/> Muddy <input type="checkbox"/> Other
Relative severity: <input type="checkbox"/> 0-None <input type="checkbox"/> 1-Slight cloudiness <input type="checkbox"/> 2-Cloudy <input type="checkbox"/> 3-Opaque
Floatables: <input type="checkbox"/> None <input type="checkbox"/> Litter <input type="checkbox"/> Petroleum (oil sheen) <input type="checkbox"/> Suds <input type="checkbox"/> Sewage <input type="checkbox"/> Other
Relative severity: <input type="checkbox"/> 0-None <input type="checkbox"/> 1-Few/Slight <input type="checkbox"/> 2-Some <input type="checkbox"/> 3-Heavy

Summary
Outfall Potential for Illicit Discharge <input type="checkbox"/> Unlikely – or – No Flow <input type="checkbox"/> Possible (presence of two or more indicators) <input type="checkbox"/> Suspect (one or more indicators with severity of 2 or 3) <input type="checkbox"/> Obvious or confirmed

Attach photo(s) of outfall.

ATTACHMENT 3 – MUNICIPAL FACILITIES INSPECTION FORM

MUNICIPAL FACILITIES INSPECTION Conducted by: _____ Date: _____

Purpose: Inspect locations with potential for stormwater pollution discharge for good housekeeping practices and BMPs, per UNA SWMP and NPDES Permit.

Instructions: Document inspection at least once/quarter. File in OIS Central Files. "Yes" means that the elements are satisfactory for the location. "NI" means the elements are not satisfactory and follow-up is required.

Examples of the following should be noted/corrected: 1) trash/litter; 2) sediment accumulation; 3) curbed storm drain unlabeled; 4) discharge other than permitted substances; 5) fertilizer residue in gutters/street; 6) stored materials (mulch, sand) leaving containment; 6) algal growth, odor, foaming, oil sheen at/near drains & outfalls.

	Location	Room #s & SKIPs	Comments (use reverse if needed)	Action Taken (use reverse if needed)	Comple- tion Date
1	541 College St.				
2	Cooling Tower -601 Cramer Way				
3	Cooling Tower - Collier Library				
4	Cooling Tower - ITS				
5	Cooling Tower -Flowers Hall				
6	Cooling Tower - GUC				
7	Cooling Tower - Kirby School				
8	Cooling Tower - LaGrange Hall				
9	Cooling Tower - Behind Main Market				
10	Cooling Tower - Wesleyan Hall				
11	Connie B. McKinney Center				
12	Fuel Pumps				
13	Grounds Dept. Equipment Storage				
14	Parking Deck and Lots				
15	Science Mechanical Room				
16	Steam Plant				
17	Vehicle Maintenance				