

APPENDIX – Questions and Answers Concerning Hoover’s New Stormwater Permit

1. Why is Hoover mandated to have an ADEM permit for our storm water program?

In 1990 the U.S. Environmental Protection Agency (EPA) promulgated regulations for establishing water quality based municipal stormwater programs to address stormwater runoff from certain industrial and construction activities and from medium and large municipal separate storm sewer systems (MS4s) serving populations of 100,000 or greater. These “Phase I” regulations were incorporated into the existing National Pollutant Discharge Elimination System (NPDES) permit rules that address point source discharges. As a result, urban nonpoint source runoff became regulated as a point source.

The Alabama Department of Environmental Management (ADEM) presently has primary jurisdiction over permitting and enforcement of the Stormwater Program for Alabama. On 23 January 2018, ADEM issued NPDES Permit Number ALS000027 to the City of Hoover that became effective on 1 February 2018 and shall expire on 31 January 2023.

2. What are the significant changes under the new permit?

The City of Hoover’s Stormwater Management Program (SWMP) has been developed to include the stormwater pollution prevention and management programs described in Part II of the existing NPDES Permit. Part II.A of the existing NPDES Permit describes eleven program elements that are required to be incorporated in the (SWMP).

1. Structural Controls;
2. Public Education and Public Involvement on Stormwater Impacts;
3. Illicit Discharge Detection and Elimination (IDDE);
4. Construction Site Stormwater Runoff Control;
5. Post-Construction Stormwater Management in New Development and Re-Development;
6. Spill Prevention and Response;
7. Pollution Prevention / Good Housekeeping for Municipal Operations;
8. Application of Pesticides, Herbicides, and Fertilizers (PHFs);
9. Oils, Toxics, and Household Hazardous Waste Control
10. Industrial Stormwater Runoff; and,
11. Monitoring.

The most significant change in the new permit is the requirements for the Post-Construction Stormwater Management in New Development and Re-Development program. Under this program, the City is required to do the following:

- Update its stormwater management regulations to ensure, to the maximum extent practicable, that post-construction runoff mimics pre-construction hydrology. A

1.1 inch rainfall over a 24-hour period preceded by a 72-hour antecedent dry period shall be the basis for the design and implementation of post construction BMPs.

- Encourage landowners and developers to incorporate the use of low impact development (LID).
- Develop an ordinance or other regulatory mechanism to ensure the applicability and enforceability of post-construction BMPs at all new qualifying development and redevelopment projects.
- Require the submittal of a post-construction BMP plan.
- Require the submittal of an as-built certification of post-construction BMPs.
- Require annual inspections of post-construction BMPs.
- Require maintenance of post-construction BMPs to ensure they will function as designed.

3. How do we anticipate those changes improving environmental quality?

By managing the post-construction stormwater runoff for a 1.1 inch rainfall, the post-construction BMPs will capture the majority of pollutants from the development and control the stormwater discharges from the development. As a result, the post-construction BMPs will help to protect the City's creeks, streams and rivers.

4. What measures of success do we anticipate seeing after 10-20 years of implementation?

As post-construction stormwater management is implemented throughout the City, water quality in our creeks, streams and rivers will continue to improve. Currently, the City has streams and rivers that are not meeting ADEM's water quality requirements for their designated use. As a result, these stream and rivers have been identified as impaired and are either listed on the 303(d) list or have a Total Maximum Daily Load (TMDL). The new post-construction stormwater management requirements will help the City's goal to restore these streams and rivers back to their designated use and no longer impaired.