

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

Storm Water Management Program



City of Canton, Ohio

218 Cleveland Ave. SW

Canton, OH 44702

www.cantonohio.gov

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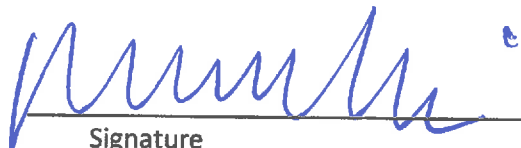
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Certification

In accordance with the signatory requirements of Part V.G.4. of NPDES Permit No. OHQ000003, the following certification is made:

"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, 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."



Signature



Date

Printed Name: Thomas M. Bernabei

Title: Mayor

List of Abbreviations

The following abbreviations may be used in this document:

| | |
|----------------|--|
| BMP | Best Management Practice |
| CB | Catch Basin |
| CSD | Collection Systems (Sewer) Department |
| DMV | Division of Motor Vehicles |
| EPA | Environmental Protection Agency |
| GIS | Geographical Information System |
| HSTS | Home Sewage Treatment System |
| ID | Illicit Discharge |
| IDDE | Illicit Discharge Detection and Elimination |
| LTMP | Long-Term Maintenance Plan |
| MCM | Minimum Control Measure |
| MH | Manhole |
| MOU | Memorandum of Understanding |
| MSDS | Material Safety Data Sheet |
| MS4 | Municipal Separate Storm Sewer System |
| N/A | Not applicable |
| NEOSWTC | Northeast Ohio Stormwater Training Council |
| NOI | Notice of Intent |
| NPDES | National Pollutant Discharge Elimination System |
| ODNR | Ohio Department of Natural Resources |
| ODOT | Ohio Department of Transportation |
| POTW | Publicly-Owned Treatment Works |
| PPGHP | Pollution Prevention/Hood Housekeeping Program |
| SWCD | Soil & Water Conservation District |
| SWMP | Storm Water Management Program |
| SWP3 | Storm Water Pollution Prevention Plan |
| TBD | To Be Determined |
| TMDL | Total Maximum Daily Load |
| US | United States |
| USEPA | United States Environmental Protection Agency |
| WQ | Water Quality |
| WRF | Water Reclamation Facility |

Introduction

The National Pollutant Discharge Elimination System (NPDES) Storm Water Program is USEPA's permitting mechanism to preserve, protect, and improve the nation's water resources from polluted storm water runoff. Since 2003, Phase II of the NPDES Storm Water Program has regulated storm water discharges from "small" municipal separate storm sewer systems (MS4s) – those serving populations less than 100,000 within Census-defined urbanized areas. Storm water discharges from MS4s in urbanized areas are a concern because of the higher concentrations of pollutants found in these discharges compared to discharges from non-urbanized areas. Common pollutants from urbanized areas include pesticides, fertilizers, oils, salt, litter and other debris, and sediment. Storm water runoff picks up and transports these and other harmful pollutants then discharges them – untreated – to waterways via storm drainage systems. When left uncontrolled, these discharges can result in fish kills, the destruction of spawning and wildlife habitats, a loss in aesthetic value, and contamination of drinking water supplies and recreational waterways that can threaten public health. With a population less than 100,000 and being located within the Canton Urbanized Area, the City of Canton has been defined by EPA as a regulated "Small MS4 Operator". Accordingly, Canton is regulated by an NPDES Small MS4 Permit which is administered locally by Ohio EPA.

The NPDES Storm Water Program mandates the City of Canton to obtain NPDES permit coverage and comply with permit requirements by preparing a written Storm Water Management Program (SWMP) and implementing it over a 5-year permit term. The SWMP is required to address pollution in storm water discharges from City of Canton MS4s by satisfying the appropriate water quality requirements of Ohio Revised Code (ORC) 6111, the Clean Water Act, and other conditions of the permits related to six "Minimum Control Measures":

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

The ultimate hope of implementation of a SWMP is to reduce pollutants in storm water runoff from City of Canton MS4s and improve the overall health and quality of the Nimishillen Creek and other local water bodies.

Since 2003, the City of Canton has obtained permit coverage under previous versions of Ohio EPA NPDES Small MS4 general permits #OHQ000001 and #OHQ000002. On September 11, 2014, Ohio EPA issued a new NPDES Small MS4 general permit, #OHQ000003. The City of Canton obtained coverage under this new permit on December 2, 2014. Although many requirements of the new permit remained unchanged compared to previous versions, the new permit has additional requirements for the City of Canton to update its SWMP and to submit the revised SWMP to Ohio EPA. Among other things, updates must include the selection of Best Management Practices (BMPs) to address USEPA-approved Total Maximum Daily Load (TMDL) recommendations for identified water quality problems associated with MS4 discharges within the City of Canton's impaired watersheds.

This document is the City of Canton's latest revised Storm Water Management Program as required by NPDES Small MS4 General Permit #OHQ000003.

Overview of City of Canton

Located in northeastern Ohio, the City of Canton provides its residents with many benefits of big-city living while maintaining its charm as a medium-sized Midwestern town. Canton is home to many well-known national landmarks like the NFL Pro Football Hall of Fame, the William McKinley Presidential Library/National Monument, and the National First Ladies Library and Research Center.

In addition to being the birthplace of American professional football and many important figures in our nation's history, Canton is also home to a vibrant arts community. The Canton Symphony Orchestra, Canton Ballet, and Canton Museum of Art give residents a place to experience art and culture from around the world, and its growing local artists' community is quickly becoming well-known as a dynamic presence in the region.

World-class hospitals and five area universities provide excellent care and an enriching learning environment while the serenity of Canton's public parks and nature preservations allow Cantonians time away from the hustle and bustle of city living. With the cost of real estate estimated at less than half of the national average, Canton is as affordable as it is enjoyable.

The City of Canton was incorporated as a city in 1838. It is the county seat of Stark County. The City's location in Stark County is approximately 58 miles southeast of Cleveland, 20 miles south of Akron, and 94 miles west of Pittsburgh, PA. The City of Canton is the 8th largest city in Ohio according to its 2010 population of 73,007. The total incorporated area is approximately 26 square miles, with most of the City being located within the Census-defined Canton Urbanized Area. The City is responsible for approximately 460 miles of public roadway within the corporation limits.

Government Structure & Legal Authority

The City of Canton is a statutory form of government made up of three branches: the Executive Branch, the Legislative Branch, and the Judicial Branch. The Executive Branch includes the Mayor and his/her administration, the Law Department, Auditor, Treasurer, and Civil Service Commission. It is the duty of the Executive Branch to administer and enforce the laws of the City. The Legislative Branch is Canton City Council. The City Council adopts ordinances and resolutions that become laws of the City. The Judicial Branch is the Canton Municipal Court District and the Clerk of Courts Office. Canton Municipal Court adjudicates misdemeanor crimes. In felony cases, Municipal Court holds preliminary hearings that bind the felony case over to the Stark County Court of Common Pleas.

Drainage & Hydrographic Information

It is estimated that there are approximately 700 miles of *public* drainage systems within the City of Canton corporation limits. Since the majority of Canton is urbanized, most storm water runoff in the City drains into public drainage systems. These public systems, or "MS4s", consist of storm sewers, culverts, roadside ditches and swales, detention and retention basins, storm water quality treatment practices, and other miscellaneous conveyances and practices. Besides City of Canton MS4s, there are also many *private* drainage systems and practices as well as various types of *waters of the state* that convey storm water runoff. Depending on topography, flow patterns, location, and respective ownership, MS4s, private drainage systems, and waters of the state may or may not be inter-connected. All drainage systems eventually discharge into one of five major drainage channels/creeks that flow through the City:

1. *West Branch Nimishillen Creek*, which generally drains western portions of the City.
2. *Middle Branch Nimishillen Creek*, which generally drains northern, central, and southeastern portions of the City.
3. *East Branch Nimishillen Creek*, which generally drains eastern portions of the City.
4. *Hurford Run*, which generally drains southwestern portions of the City.
5. *Nimishillen Creek*, which generally drains southern portions of the City.

All five of these creeks and their respective drainage areas comprise the Nimishillen Creek watershed. The Nimishillen Creek ultimately drains southerly into the Tuscarawas River, the Muskingum River, the Ohio River, the Mississippi River, and the Gulf of Mexico, respectively.

Total Maximum Daily Loads (TMDLs)

The City of Canton is located entirely within the 188-square-mile Nimishillen Creek watershed. In 2009, Ohio EPA’s TMDL Report for the Nimishillen Creek Watershed was approved by USEPA. The TMDL Report specifies the maximum amounts of certain types of pollutants that can be in the Nimishillen Creek before acceptable water quality standards can no longer be met. For the Nimishillen Creek watershed, impairments were found for biological communities, phosphorus levels, and bacteria levels. Thus, TMDLs were established for habitat (biological communities), nutrients (phosphorous), and bacteria. This means that anything that is considered to be a cause or source of the specific impairments of concern needs to be a priority so that appropriate actions can be taken to reduce the associated amounts of pollutants from those sources to acceptable levels.

| Nimishillen Creek Watershed TMDL Pollutant Parameters of Concern |
|---|
| <input checked="" type="checkbox"/> Habitat (biological communities) |
| <input checked="" type="checkbox"/> Nutrients (phosphorous) |
| <input checked="" type="checkbox"/> Bacteria |

One of many requirements of the NPDES Small MS4 Permit is for the City of Canton to implement appropriate actions and BMPs to address TMDLs as part of its SWMP. The Northeast Ohio Storm Water Training Council (NEOSWTC) has recommended certain BMPs for each Minimum Control Measure to address Nimishillen Creek TMDLs (see <http://nehiostormwater.com/index.html> for details). All of the recommended BMPs are also listed in this SWMP. Some of them have already been implemented, are being implemented, will be implemented, or will only be implemented as feasible.

Storm Water Management Program Development

As mentioned in the “Introduction”, the City’s SWMP is mainly required to address six “Minimum Control Measures (MCMs)”:

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

Each MCM requires the development of a respective individual program focused on a particular aspect of storm water pollution prevention. Collectively, the six individual programs form a larger comprehensive “Storm Water Management Program”.

| Composition of Comprehensive “Storm Water Management Program” | |
|--|--|
| Minimum Control Measure # | MCM Program Name |
| MCM#1: | “Storm Water Public Education and Outreach Program” |
| MCM#2: | “Storm Water Public Involvement/Participation Program” |
| MCM#3: | “Storm Water Illicit Discharge Detection and Elimination (IDDE) Program” |
| MCM#4: | “Construction Site Storm Water Control Program” |
| MCM#5: | “Post-Construction Storm Water Management Program” |
| MCM#6: | “Pollution Prevention/Good Housekeeping Program” |

In general, the comprehensive SWMP must include descriptions of Best Management Practices (BMPs) that are to be implemented to satisfy each of the six MCMs, including documentation of why particular BMPs have been selected in light of local water quality issues, respective goals, schedules, responsible parties for BMP implementation, and other permit requirements.

City of Canton Storm Water Management Program

This document is the City of Canton's comprehensive SWMP. It is the City's written response to the NPDES Small MS4 Permit and explains all six of the separate programs, their requirements, and the various actions – or BMPs – that the City plans to implement over the course of five years to be compliant with permit conditions.

Although the City of Canton government entity as a whole is regulated by the NPDES Small MS4 Permit, satisfying permit conditions requires varying levels of involvement by different City departments. Part of the SWMP development process includes identifying which City departments need to be involved, their respective levels of involvement, and clearly documenting expectations and responsibilities for implementation of assigned program BMPs. Department heads may end up delegating their department responsibilities internally to a designated employee. Thus, there are essentially three (3) main positions and roles of responsibility for various aspects of SWMP implementation.

| Main Positions and Roles of Responsibility for SWMP Implementation | | |
|---|--|---|
| # | Position | Responsibilities |
| 1 | Director of Public Service | Legal aspects and overall implementation of SWMP |
| 2 | Storm Water Program Coordinator | Overall coordination of SWMP and Annual Reports |
| 3 | Designated employees from various departments (typically department heads) | Implementation and documentation of assigned BMPs |

Coordination is required across multiple positions, departments, and agencies in order to implement many of the MCM Programs and BMPs. When reliance on another entity is needed to implement certain BMPs, agreements such as Memorandums of Understanding (MOUs) are in place.

| Summary of Decision Process/Rationale for Development of a "Storm Water Management Program" | |
|--|--|
| Step # | Description |
| 1 | Submit NOI to Ohio EPA and obtain coverage under NPDES Small MS4 Permit |
| 2 | Understand permit requirements including all six MCMs, performance standards, addressing TMDLs, and annual reporting |
| 3 | Identify BMPs (in place and/or needed) to satisfy permit requirements |
| 4 | Identify whether or not City has legal authority to implement requirements |
| 5 | Determine strategies to implement each MCM including specific BMPs, measurable goals, frequencies of implementation, and responsible parties (including any MOUs, as needed) |
| 6 | Prepare written SWMP including rationales for selection of BMPs and measurable goals |
| 7 | Implement program BMPs and requirements |
| 8 | Prepare and submit annual reports to Ohio EPA |
| 9 | Perform annual evaluation of program implementation and success |
| 10 | Make adjustments to program, as needed |

City of Canton Storm Water Management Program

Table of Organization & Department Involvement

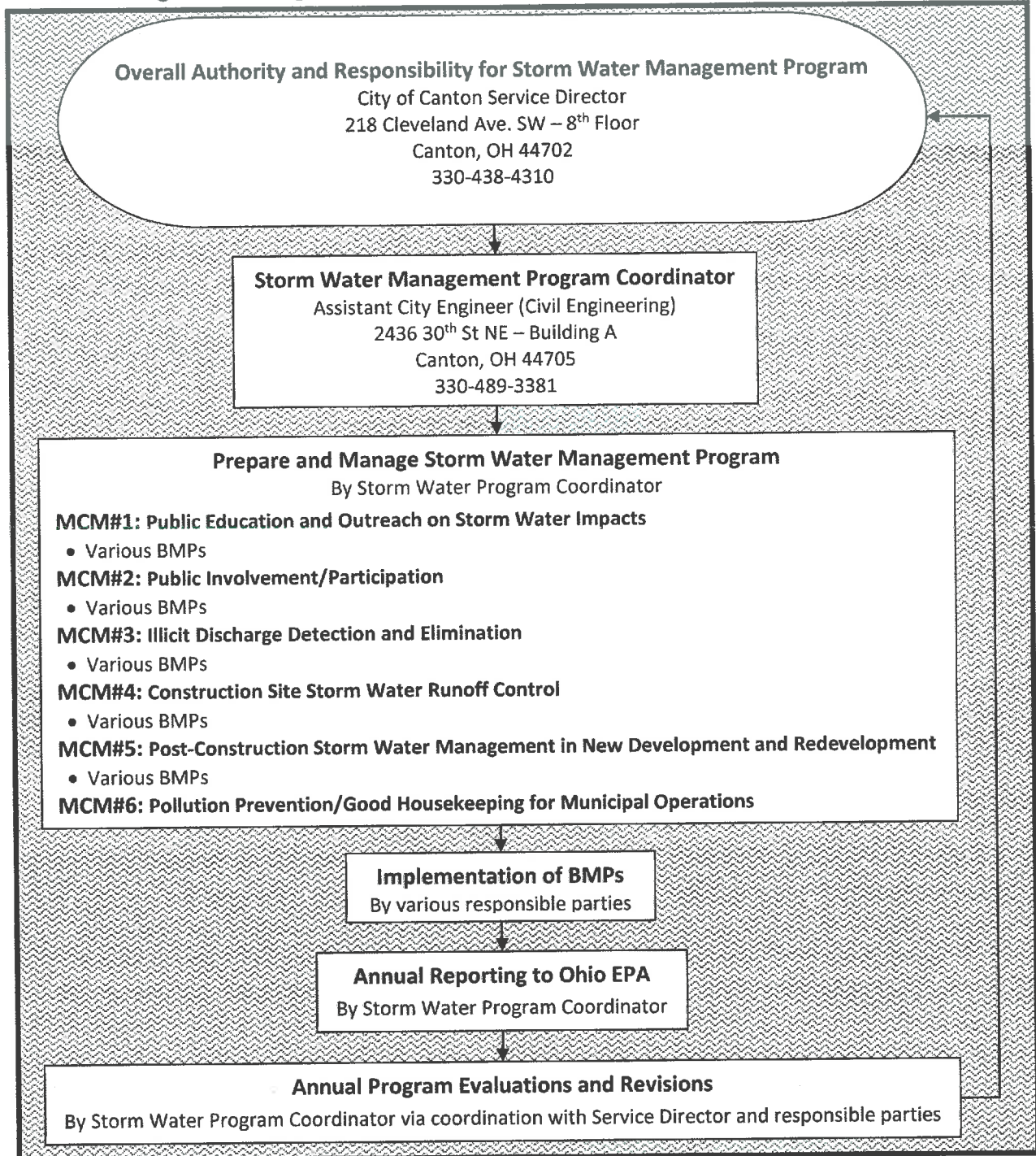
The following Table of Organization shows the overall responsibility for the SWMP, the SWMP Primary Point of Contact, and responsible departments and respective positions that have definite, possible, or potential involvement in implementing various BMPs:

| Storm Water Management Program Table of Organization | | | | | | | |
|---|-----------------------------------|--------------|--------------|--------------------------------|--------------|--------------|--------------|
| Overall Responsibility (Overall authority and implementation of SWMP) | | | | | | | |
| City of Canton Service Director 218 Cleveland Ave. SW – 8 th Floor Canton, OH 44702 330-438-4310 | | | | | | | |
| Primary Point of Contact/Storm Water Management Program Coordinator (Overall coordination of SWMP and Annual Reports) | | | | | | | |
| Chris Barnes, PE, CPESC, CPSWQ, CPMSM – Asst. City Engineer City of Canton Engineering Department 2436 30 th St NE – Building A Canton, Ohio 44705 330-489-3381 (Main) 330-438-6908 (Direct) chris.barnes@cantonohio.gov | | | | | | | |
| Responsible Parties (Implementation of BMPs) | | | | Minimum Control Measure | | | |
| Department | Position | MCM#1 | MCM#2 | MCM#3 | MCM#4 | MCM#5 | MCM#6 |
| Building | Chief Building Official | ✓ | ✓ | ✓ | | | ✓ |
| Building Maintenance | Supervisor | | | ✓ | | | ✓ |
| Civil Engineering | Assistant City Engineer (Civil) | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| Collection Systems (CSD) | Superintendent | ✓ | ✓ | ✓ | | | ✓ |
| Development | Director | ✓ | ✓ | ✓ | | ✓ | |
| Division of Motor Vehicles (DMV) | Superintendent | | | | | | ✓ |
| Fire | Chief | | | ✓ | | | ✓ |
| Health ¹ | Environmental Health Director | ✓ | ✓ | ✓ | | | |
| Judges | Community Service Director | ✓ | ✓ | | | | |
| Mayor's Administration | Administrative Assistant | ✓ | ✓ | | | | |
| Parks & Recreation | Director | ✓ | ✓ | | | | ✓ |
| Planning | Director | ✓ | ✓ | ✓ | | ✓ | |
| Police (Impound Lot) | Lieutenant | | | | | | ✓ |
| Sanitation | Superintendent | ✓ | ✓ | ✓ | | | ✓ |
| Service Director | Service Director | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| Stark Soil & Water Conservation District (SWCD) ¹ | Urban Resource Specialist | ✓ | ✓ | ✓ | ✓ | ✓ | |
| Street | Superintendent | ✓ | ✓ | ✓ | | | ✓ |
| Traffic: Parking | Manager | | | | | | ✓ |
| Traffic: Sign & Paint | Assistant City Engineer (Traffic) | | | | | | ✓ |
| Urban Forestry | City Arborist | ✓ | ✓ | | | | ✓ |
| Water | Superintendent | ✓ | ✓ | | | | ✓ |
| Water Reclamation Facility (WRF) | Superintendent | ✓ | ✓ | | | | ✓ |
| Zoning | Zoning Inspector | ✓ | ✓ | | | ✓ | |

✓ = Definite, possible, or potential involvement in at least one BMP. See respective MCMs for details.

¹ Memorandum of Understanding (MOU) in place to define responsibilities.

Storm Water Management Program Process of Implementation



MCM#1: Public Education and Outreach on Storm Water Impacts

General Requirements

As part of its overall Storm Water Management Program, the City of Canton is required to implement a “Storm Water Public Education Program” that utilizes different mechanisms to provide various storm water pollution reduction and prevention educational themes to the public. See “Further Guidance and Information for MCM#1” below for details.

Decision Process for Development of Storm Water Public Education Program

The decision process for the development of a Storm Water Public Education Program consisted of the following steps, at a minimum:

| Steps to Develop and Implement a “Storm Water Public Education and Outreach Program” | |
|---|--|
| Step # | Description |
| 1 | Understand permit requirements |
| 2 | Identify and document the City’s decision process for the development of a Storm Water Public Education and Outreach Program per permit requirements |
| 3 | Identify and implement program BMPs |
| 4 | Prepare and submit annual reports to Ohio EPA |
| 5 | Evaluate the success of the program annually and make adjustments accordingly |

Additional information pertaining to the decision process is provided below.

Informing Individuals and Households about the Steps they can take to Reduce Storm Water Pollution

The City of Canton plans to inform individuals and households about the steps they can take to reduce storm water pollution through the use of various combinations of mechanisms (means to deliver a message) and themes (messages). Selected mechanisms will be based on available resources. Selected themes will mostly reflect recommendations by EPA and the Northeast Ohio Storm Water Training Council (see “Best Management Practices (BMPs)” below).

Informing Individuals and Groups on How to Become Involved in the Storm Water Management Program

Various mechanisms will be used by the City of Canton to inform individuals and groups on how to become involved in the Storm Water Management Program and related public involvement activities (see MCM#2). Public input is always welcomed through City Council meetings as well as through the Storm Water Management page of the City’s website. Decisions to implement certain BMPs are often made annually and are dependent on department budgets and available resources. Therefore, upon determination that it is feasible to implement certain activities, specific details about ways to be involved in the Storm Water Management Program will be provided accordingly through respective chosen mechanisms.

Target Audiences

As of the 2010 Census, the City of Canton had a population of 73,007. It is approximately 25.5 square miles in incorporated land area. The City is mostly comprised of residential, commercial, industrial, and institutional entities. As such, these are likely to have significant impacts to storm water runoff. Therefore, the intended target audiences for the Storm Water Public Education and Outreach Program are the general public, businesses, public employees, and the development community.

MCM#1 performance standards require at least one theme or message to be targeted to the development community. Therefore, through a Memorandum of Understanding (MOU) between the City of Canton and the Stark SWCD, the Stark SWCD provides storm water education for the development community. Workshops are offered with typical themes related to construction site and post-construction storm water quality controls.

Target Pollutants and Sources

Target pollutants and sources that the City of Canton's Storm Water Public Education and Outreach Program is intended to address are those identified in the TMDL report for the Nimishillen Creek Watershed (see "Total Maximum Daily Loads (TMDLs)" above) as well as other common pollutants and sources such as: road salt, fertilizers, pesticides, unwanted vehicle fluids, unwanted household and commercial products, pet waste, car wash water, grey water, septic/sewage, yard wastes, trash/litter, construction activities, illegal discharges and connections, spills, etc. Therefore, these target pollutants and sources help shape appropriate themes chosen to be used for each public education mechanism.

Outreach Strategy

The outreach strategy to reach target audiences was to initially identify mechanisms (means to deliver a message) that were already being utilized or could be utilized to provide storm water education themes or messages. Considerations of mechanisms to be used included: availability, practicality, cost-effectiveness, and the ability of the mechanisms to satisfy the performance standards of MCM#1. Such mechanisms include, but may not be limited to:

- City's website
- City Council meetings
- Other meetings
- Local publications
- Local flyers/postings
- Social media
- Local workshops
- Storm drain markings
- Signage

Then, over the course of the five-year permit term and depending on annual budgetary and feasibility circumstances, certain mechanisms are to be selected and utilized by various departments to deliver appropriate messages. The combinations of the mechanisms and storm water education themes are the BMPs for the City's Storm Water Public Education and Outreach Program.

The ultimate goal of Canton's Storm Water Public Education and Outreach Program is to provide practical storm water education intended to result in the reduction of pollutants in storm water runoff while satisfying the MCM performance standards to use more than one mechanism and deliver at least five different storm water themes or messages over the permit term. Through implementation respective BMPs, it is the hope that the City of Canton's Storm Water Public Education and Outreach Program results in outreach approaching approximately 100% of the target audiences.

Responsible Parties for Implementing the Storm Water Public Education and Outreach Program

The City of Canton Service Director is responsible for the overall compliance of the City with the NPDES Storm Water Permit requirements. Coordination of the SWMP is delegated to the Assistant City Engineer of the Civil Engineering Department. Responsibility for implementation of *certain* BMPs has been assigned to *specific* departments. *Other* BMPs may be implemented by *any* department *as feasible*. See Best Management Practices (BMPs) below and the Table of Organization for details. As BMPs are implemented, each respective responsible position is required to maintain appropriate supporting documentation.

Best Management Practices (BMPs)

Aside from Minimum Control Measure #1 BMPs (mechanisms and themes) that may be described above, the table below also lists certain BMPs that are expected or required to be implemented by certain departments, while others are shown as recommendations for potential implementation depending on applicability and/or feasibility. Recommendations are based on USEPA and NEOSWTC recommendations:

- USEPA has prepared "BMP Fact Sheets" and other resources related to many BMPs in the City's Storm Water Management Program. They can be found on the *National Menu of Best Management Practices (BMPs) for Stormwater* webpage by clicking on the respective Minimum Control Measure tabs. The BMP Fact Sheets provide further explanation, applicability, recommendations, implementation, and effectiveness information of common

City of Canton Storm Water Management Program

BMPs. Fact sheets and resources should be reviewed periodically by employees who are involved in respective BMP implementation. See "Further Guidance and Information for MCM#1" below.

- The Northeast Ohio Storm Water Training Council (NEOSWTC) has prepared "TMDL Fact Sheets" pertaining to respective Nimishillen Creek TMDLs and corresponding recommended BMPs to address the TMDLs. In order to meet permit requirements, appropriate BMPs must be selected to address TMDL recommendations. Therefore, some of the recommended themes are to be utilized as part of the City's Storm Water Public Education and Outreach Program.

Depending on whether or not a BMP is a requirement or recommendation, measurable goals have been written accordingly. Annual Reports will document exactly which BMPs were implemented in the previous year as well as identify possible BMPs to be implemented in the upcoming year.

**Minimum Control Measure #1
Public Education and Outreach on Storm Water Impacts
Best Management Practices (BMPs)**

See footnotes at end of table

| # | BMP | | | Responsible Party | Legal Authority? | Measurable Goals | | Address TMDLs? |
|----|--|--|--|---|---------------------|--|--|---------------------|
| | Theme/Description | Mechanism | Justification | | | (Schedules, Frequency, Etc.) | Justification | |
| 1 | Storm Water Education for the Development Community – Through a Memorandum Of Understanding (MOU) between the City of Canton and Stark SWCD, training opportunities are provided by Stark SWCD for the development community | Workshops | Permit requires one theme to be targeted to the development community. | Stark SWCD | Yes, via MOU | <ul style="list-style-type: none"> Provide workshop once per year; Annual Reporting requirements⁶ | Practical | [TBD ³] |
| 1a | Storm Water Education for the Development Community | [TBD ^{1,2,3}] | Permit requires one theme to be targeted to the development community | Development; [Any Department ³] | [TBD ³] | <ul style="list-style-type: none"> Implement requirement⁵; Annual Reporting requirements⁶ | [TBD ³] | [TBD ³] |
| 2 | [Various storm water themes ^{1,2,3}] - The Storm Water Management page on the City Engineering Department's web page contains a lot of information of storm water education and pollution prevention. | Website | City Engineering Department's website is an excellent resource for information | Civil Engineering | Yes | <ul style="list-style-type: none"> Maintain Storm Water Education page on website; update accordingly; Annual Reporting requirements⁶ | Web page is always available and information can be added easily | Yes |
| 2a | [Various storm water themes ^{1,2,3}] | Website | Website is available | [Any Department ³] | Yes | <ul style="list-style-type: none"> Implement BMP⁵; Annual Reporting requirements⁶ | [TBD ³] | [TBD ³] |
| 3 | [Various storm water themes ^{1,2,3}] | Publications ³ | Various local publications available | [Any Department ³] | Yes | <ul style="list-style-type: none"> Implement BMP⁵; Annual Reporting requirements⁶ | [TBD ³] | [TBD ³] |
| 4 | "Dump No Waste – Drains to Stream" messages on storm drain inlets – Short but to-the-point messages that raise awareness about the connection between storm drains | On all new City-owned storm water inlets | Castings are required to contain messages per City Engineering | Civil Engineering | Yes | <ul style="list-style-type: none"> Continue to require all new City-owned storm inlets to contain the messages; | Continuous/ongoing/as-needed basis | No |

**Minimum Control Measure #1
Public Education and Outreach on Storm Water Impacts
Best Management Practices (BMPs)**

See footnotes at end of table

| BMP | | | | | | | | |
|-----|---|--|-------------------------------------|-------------------------------|---------------------|---|---------------------|---------------------|
| # | Theme/Description | Mechanism | Justification | Responsible Party | Legal Authority? | Measurable Goals (Schedules, Frequency, Etc.) | Justification | Address TMDLs? |
| | and receiving waters in hopes to deter illicit discharges. | | standards drawings | | | <ul style="list-style-type: none"> Annual Reporting requirements⁵ | | |
| 5 | Themes such as: <ul style="list-style-type: none"> “Stormwater Outreach for Commercial Businesses”² “Tailoring Outreach Programs to Minority and Disadvantaged Communities and Children”² “Alternatives to Toxic Substances”² “Chlorinated Water Discharge Options”² “Landscaping and Lawn Care”² “Pest Control”² “Pet Waste Management”² “Proper Disposal of Household Hazardous Wastes”² “Residential Car Washing”² “Trash and Debris Management”² “Water Conservation Practices for Homeowners”² “Automobile Maintenance”² “Pollution Prevention for Businesses”² “Promoting Low Impact Development (LID)”² | Mechanisms such as: <ul style="list-style-type: none"> “Classroom Education on Stormwater”² “Using the Media”² “Educational Displays, Pamphlets, Booklets, and Bill Inserts”² “Promotional Giveaways”² “Stormwater Outreach Materials”² | Recommended by USEPA ² | [Any Department] ³ | [TBD ³] | <ul style="list-style-type: none"> Implement recommendations⁵; Annual Reporting requirements⁵ | [TBD ³] | [TBD ³] |
| 6 | <ul style="list-style-type: none"> Protection and maintenance of natural vegetative buffers along waterways Management of manure and pet wastes Reduction of impervious surfaces and the increase of on-site infiltration | [TBD ^{1,2,3}] | Recommended by NEOSWTC ¹ | [Any Department] ³ | [TBD ³] | <ul style="list-style-type: none"> Implement recommendations⁵; Annual Reporting requirements⁵ | [TBD ³] | Yes |

Minimum Control Measure #1

Public Education and Outreach on Storm Water Impacts
Best Management Practices (BMPs)

See footnotes at end of table

| # | BMP | | | Responsible Party | Legal Authority? | Measurable Goals | | Address TMDLs? |
|---|---|---------------------|---------------------|--------------------------------|---------------------|---|---------------------|---------------------|
| | Theme/Description | Mechanism | Justification | | | (Schedules, Frequency, Etc.) | Justification | |
| 7 | <ul style="list-style-type: none"> Composting and management of grass clippings and yard wastes Operation & Maintenance of discharging and non-discharging sewage treatment systems Open or illegal dumping Reduction and management of residential and agricultural fertilizers Reduction of soil erosion on residential, agricultural, and construction sites Construction site erosion and sediment control practices Pond maintenance education (e.g. manage waterflow, install aerators, maintain vegetative buffers, etc.) Riparian and wetland setbacks Conservation development practices USDA-Natural Resource Conservation Service (NRCS) Programs supporting BMPs for agribusinesses (i.e. Conservation Reserve Program (CRP), Conservation Reserve Enhancement Program (CREP), and the Environmental Quality Incentives Program (EQIP)) | [TBD ³] | [TBD ³] | [Any Department ³] | [TBD ³] | <ul style="list-style-type: none"> [TBD³]; Annual Reporting requirements⁶ | [TBD ³] | [TBD ³] |

¹ Specific BMPs that address TMDLs are recommended by the Northeast Ohio Stormwater Training Council (NEOSWTC). See Total Maximum Daily Loads section of SWMP.

² See USEPA's National Menu of Best Management Practices (BMPs) for Stormwater at: <https://www.epa.gov/npdes/national-menu-best-management-practices-bmps-stormwater#edu>.

³ To be determined.

⁴ As applicable.

⁵ As feasible.

⁶ See "Annual Reporting for MCM#1" below.

Evaluating the Success of MCM#1

There are various ways to measure the City of Canton's success of implementing Minimum Control Measure #1:

- Assess individual BMPs to determine if they have been implemented in accordance with measurable goals, MCM performance standards, and applicable EPA and NEOSWTC recommendations.
- Annual Reports will provide indication of the status of implementation.
- The Storm Water Program Coordinator will conduct an annual review of the program with the Service Director so that appropriate adjustments and actions can be taken.
- Ohio EPA or other entities may conduct sampling of the Nimishillen Creek to determine if corresponding pollutant levels have decreased.
- Ohio EPA may perform audits of the City's Storm Water Management Program.

Annual Reporting for MCM#1

Whenever any of the following BMPs are implemented or are planned to be implemented, the responsible party will need to track corresponding information. The Storm Water Management Program Coordinator will send out annual questionnaires to departments requesting the respective information and possibly other information as well. The information provided will then be utilized to prepare Annual Reports that will be submitted as required to Ohio EPA.

- **Any Public Education/Outreach BMP:**
 - a. Regarding the previous year (BMP was implemented):
 - i. Mechanism (means by which education was provided):
 - ii. Responsible Party:
 - iii. Measurable Goal:
 - iv. Theme or Message:
 - v. Target Audience:
 - vi. % of Target Audience Reached:
 - vii. Description/Summary of Results:
 - viii. Was it Effective (Yes or No)?
 - ix. You are required to maintain supporting documentation. What do you have?
 - b. Regarding this year (BMP is planned to be implemented):
 - i. Mechanism (means by which education will be provided):
 - ii. Responsible Party:
 - iii. Measurable Goal:
 - iv. Theme or Message:
 - v. Target Audience:
 - vi. % of Target Audience to be Reached:
 - vii. Description/Summary of Planned Activities:
 - viii. Proposed Schedule:

Further Guidance and Information for MCM#1

See the "Additional Information" section of this Storm Water Management Program.

MCM#2: Public Involvement/Participation

General Requirements

As part of its overall Storm Water Management Program, the City of Canton is required to implement a "Storm Water Public Involvement/Participation Program" that involves the public in activities related to storm water pollution reduction and prevention. See "Further Guidance and Information for MCM#2" below for details.

Decision Process for Development of "Storm Water Public Involvement/Participation Program"

The decision process for the development of a Storm Water Public Involvement/Participation Program consisted of the following steps, at a minimum:

| Steps to Develop and Implement a "Storm Water Public Involvement/Participation Program" | |
|--|---|
| Step # | Description |
| 1 | Understand permit requirements |
| 2 | Identify and document the City's decision process for the development of a Storm Water Public Involvement/Participation Program per permit requirements |
| 3 | Identify and implement program BMPs |
| 4 | Prepare and submit annual reports to Ohio EPA |
| 5 | Evaluate the success of the program annually and make adjustments accordingly |

Additional information pertaining to the decision process is provided below.

Involving the Public in the Initial Development of the Storm Water Management Program

Throughout the planning stages of preparing for the NPDES Phase II Storm Water Program under the initial 2003 permit, the City of Canton was part of a consortium with other regulated communities in Stark County, led by the Stark County Regional Planning Commission. Regular meetings occurred with consortium members to specifically discuss the NPDES Phase II program requirements and Storm Water Management Program preparation strategies. Public meetings were held in which NPDES Phase II updates were provided and public input was welcomed. Also, NPDES Phase II plan preparation strategy and partnership with Stark RPC was discussed at City Council meetings in which public input was welcomed. However, no significant public input was received and therefore the general public was not a major factor in the development and submittal of the City's Notice Of Intent (NOI) and SWMP. However, the "Storm Water Management" page on the City's website has a message that welcomes public input on the Storm Water Management Program.

Involving the Public in the Implementation of the Program

Since 2003, opportunities to be involved in activities related to the City's SWMP have been subjects on the City's website, through publications, announcements, public meetings, and other means of communication. In addition, the general public also has the ability to obtain information, report concerns, and provide comments on various issues to the City in person, by phone, mail, email, or other means. Public involvement in the implementation of the SWMP has been mainly limited to public involvement activities. The City will continue to offer various public involvement activities as indicated in "Best Management Practices (BMPs)" below.

Target Audiences

The general public, which is made up of various types of ethnic and economic groups, is the overall target audience for the City of Canton's Storm Water Public Involvement/Participation Program. However, each BMP listed below describes the specific target audience it is intended to reach.

Public Involvement Activities

A key component to developing a Storm Water Public Involvement/Participation Program was to identify public involvement activities that were already being implemented by the City that could best be used to satisfy permit requirements and the likelihood of those activities to continue to be available to be implemented. As such, public

City of Canton Storm Water Management Program

involvement activities that are most likely to be implemented are mainly in the form of street, neighborhood, and park cleanups. However, there are others that could also end up being implemented, depending on feasibility. There is also local watershed group comprised of various volunteer representatives and other watershed constituents that meets regularly to discuss watershed issues and organize watershed-related activities. Public involvement activities are the BMPs for the City's Storm Water Public Involvement/Participation Program. See BMPs below for further information.

The ultimate goal of Canton's Storm Water Public Involvement/Participation Program is to provide practical public involvement activities intended to directly or indirectly result in the reduction of pollutants in storm water runoff while satisfying the MCM performance standards to conduct at least five public involvement activities over the permit term.

Responsible Parties for Implementing the Storm Water Public Involvement/Participation Program

The City of Canton Service Director is responsible for the overall compliance of the City with the NPDES Storm Water Permit requirements. Coordination of the SWMP is delegated to the Assistant City Engineer of the Civil Engineering Department. Responsibility for implementation of *certain* BMPs has been assigned to *specific* departments. *Other* BMPs may be implemented by *any* department *as feasible*. See Best Management Practices (BMPs) below and the Table of Organization for details. As BMPs are implemented, each respective responsible position is required to maintain appropriate supporting documentation.

Best Management Practices (BMPs)

Aside from Minimum Control Measure #2 BMPs (activities) that may be described above, the table below also lists certain BMPs that are expected or required to be implemented by certain departments, while others are shown as recommendations for potential implementation depending on applicability and/or feasibility. Recommendations are based on USEPA and NEOSWTC recommendations:

- USEPA has prepared "BMP Fact Sheets" and other resources related to many BMPs in the City's Storm Water Management Program. They can be found on the *National Menu of Best Management Practices (BMPs) for Stormwater* webpage by clicking on the respective Minimum Control Measure tabs. The BMP Fact Sheets provide further explanation, applicability, recommendations, implementation, and effectiveness information of common BMPs. Fact sheets and resources should be reviewed periodically by employees who are involved in respective BMP implementation. See "Further Guidance and Information for MCM#2" below.
- The Northeast Ohio Storm Water Training Council (NEOSWTC) has prepared "TMDL Fact Sheets" pertaining to respective Nimishillen Creek TMDLs and corresponding recommended BMPs to address the TMDLs. In order to meet permit requirements, appropriate BMPs must be selected to address TMDL recommendations. Therefore, some of the recommended activities are to be utilized as part of the City's Storm Water Public Involvement/Participation Program.

Depending on whether or not a BMP is a requirement or recommendation, measurable goals have been written accordingly. Annual Reports will document exactly which BMPs were implemented in the previous year as well as identify possible BMPs to be implemented in the upcoming year.

**Minimum Control Measure #2
Public Involvement/Participation
Best Management Practices (BMPs)**

See footnotes at end of table

| # | BMP Activity | Justification | Responsible Party | Legal Authority ? | Measurable Goals | | Address TMDLs? |
|---|---|--|-------------------------------|-------------------|--|------------------------------------|---------------------|
| | | | | | (Schedules, Frequency, Etc.) | Justification | |
| 1 | Canton Parks Cleanups - Various cleanup and beautification activities take place within Canton Parks throughout the year with assistance from the general public. Many of these parks have streams, ponds, lakes, or wetlands located within them. | Cleanups prevent litter and trash from washing into the City's MS4 and polluting local water bodies. | Parks & Recreation | Yes | <ul style="list-style-type: none"> Once per year⁵; Annual Reporting requirements⁶ | Practical | Yes |
| 2 | "Beauty-A-Neighborhood (BAN) Program" - In 2006, the City of Canton Street Department introduced the BAN Program with the objective of fostering neighborhood beautification through a dedication of public resources to those neighborhood groups willing to assist the City in the process. Street Department employees assist residents with neighborhood cleanup projects. The BAN Program establishes scheduled dates for the City and neighborhood groups to partner up for neighborhood cleanups, one neighborhood at a time. Up to nine (9) days are scheduled between April 1st and October 31st of each year. Any individual or organization within the City can apply for one of the available dates. | Cleanups prevent litter and trash from washing into the City's MS4 and polluting local water bodies. | Street | Yes | <ul style="list-style-type: none"> Utilize up to 9 days per year for neighborhood cleanups⁵; Annual Reporting requirements⁶ | Per BAN Program | [TBD ³] |
| 3 | Community Cleanups via Grant Program - The City of Canton's Development Department issues grants to certain non-profit agencies in which funds are provided to conduct various activities including community cleanups. | Cleanups prevent litter and trash from washing into the City's MS4 and polluting local water bodies. | Development | Yes | <ul style="list-style-type: none"> [TBD³]; Annual Reporting requirements⁶ | [TBD ³] | [TBD ³] |
| 4 | Community Service Cleanups - When the Canton Municipal Court sentences people to perform community service, some of the service workers are assigned to the Road Crew. The Canton Municipal Court's Road Crew picks up litter and trash from the streets of Canton as well as cleaning up nuisance properties for the City of Canton's Code Enforcement and Health Department. Certain areas are targeted based on complaints received. | Cleanups prevent litter and trash from washing into the City's MS4 and polluting local water bodies. | Judges | Yes | <ul style="list-style-type: none"> Conduct community service cleanups throughout the year; Annual Reporting requirements⁶ | Continuous/ongoing/as-needed basis | [TBD ³] |

Minimum Control Measure #2
Public Involvement/Participation
Best Management Practices (BMPs)

See footnotes at end of table

| # | BMP Activity | Justification | Responsible Party | Legal Authority ? | Measurable Goals | | Address TMDLs? |
|---|---|--|--------------------------------|---------------------|---|---------------------|---------------------|
| | | | | | (Schedules, Frequency, Etc.) | Justification | |
| 5 | <p>Public involvement activities such as:</p> <ul style="list-style-type: none"> • Citizen representatives on a storm water management panel • Public hearings • Working with citizen volunteers willing to educate others about the program • Volunteer monitoring • Stream cleanup activities | local water bodies. Recommended by Ohio EPA | [Any Department ³] | [TBD ³] | <ul style="list-style-type: none"> • Implement recommendations⁵; • Annual Reporting requirements⁶ | [TBD ³] | [TBD ³] |
| 6 | <p>Public involvement activities such as:</p> <ul style="list-style-type: none"> • "Adopt-A-Stream Programs"² • "Reforestation Programs"² • "Storm Drain Marking"² • "Stream Cleanup and Monitoring"² • "Volunteer Monitoring"² • "Wetland Plantings"² • "Attitude Surveys"² • "Stakeholder Meetings"² • "Watershed Organizations"² | Recommended by USEPA ² | [Any Department ³] | [TBD ³] | <ul style="list-style-type: none"> • Implement recommendations⁵; • Annual Reporting requirements⁶ | [TBD ³] | [TBD ³] |
| 7 | <p>Any of the following public involvement activities:</p> <ul style="list-style-type: none"> • Streamside plantings and cleanups • Stream or wetland restoration projects • Construct a rain garden with assistance from the public • Allow residents to provide input on new proposed codes (i.e. downspout disconnection, conservation development, riparian and wetland setbacks, etc.) • Tree plantings, achieve "Tree City" status • Conduct a charity car wash that implements best management practices and promotes environmental responsibility • Establish public reporting mechanism (complaint hotline, webpage, etc.) to identify non-compliance from construction sites | Recommended by NEOSWTC ¹ | [Any Department ³] | [TBD ³] | <ul style="list-style-type: none"> • Implement recommendations⁵; • Annual Reporting requirements⁶ | [TBD ³] | Yes |

**Minimum Control Measure #2
Public Involvement/Participation
Best Management Practices (BMPs)**

See footnotes at end of table

| # | BMP Activity | Justification | Responsible Party | Legal Authority ? | Measurable Goals | | Address TMDLs? |
|---|--|-----------------------|--------------------------------|---------------------|---|---------------------|---------------------|
| | | | | | (Schedules, Frequency, Etc.) | Justification | |
| 8 | <ul style="list-style-type: none"> Have residents pledge a “no-fertilizer” lawn program “Green” workshops in which residents make environmentally-friendly lawn care and cleaning supplies Identify locations of riparian restoration activities, engage the public in the planting of native vegetation Storm drain stenciling Establish “pick-up pet waste” stations for residents on public property, parks, city buildings, cemeteries, etc. Host agricultural best management practices workshops for manure management and application Work with local health department to educate property owners on sewage treatment system operation and maintenance Address open or illegal dumping with public involvement | [TBD ^{1,2}] | [Any Department ³] | [TBD ³] | <ul style="list-style-type: none"> [TBD³]; Annual Reporting requirements⁶ | [TBD ³] | [TBD ³] |

¹ Specific BMPs that address TMDLs are recommended by the Northeast Ohio Stormwater Training Council (NEOSWTC). See Total Maximum Daily Loads section of SWMP.
² See USEPA’s National Menu of Best Management Practices (BMPs) for Stormwater at:

<https://www.epa.gov/npdes/national-menu-best-management-practices-bmps-stormwater#inv>.

³ To be determined.

⁴ As applicable.

⁵ As feasible.

⁶ See “Annual Reporting for MCM#2” below.

Evaluating the Success of MCM#2

There are various ways to measure the City of Canton's success of implementing Minimum Control Measure #2:

- Assess individual BMPs to determine if they have been implemented in accordance with measurable goals, MCM performance standards, and applicable EPA and NEOSWTC recommendations.
- Annual Reports will provide indication of the status of implementation.
- The Storm Water Program Coordinator will conduct an annual review of the program with the Service Director so that appropriate adjustments and actions can be taken.
- Ohio EPA or other entities may conduct sampling of the Nimishillen Creek to determine if corresponding pollutant levels have decreased.
- Ohio EPA may perform audits of the City's Storm Water Management Program.

Annual Reporting for MCM#2

Whenever any of the following BMPs are implemented or are planned to be implemented, the responsible party will need to track corresponding information. The Storm Water Management Program Coordinator will send out annual questionnaires to departments requesting the respective information and possibly other information as well. The information provided will then be utilized to prepare Annual Reports that will be submitted as required to Ohio EPA.

- **Any Public Involvement/Participation BMP:**
 - a. Regarding the previous year (BMP was implemented):
 - i. Activity:
 - ii. Responsible Party:
 - iii. Measurable Goal:
 - iv. Theme or Message:
 - v. Target Audience:
 - vi. Estimate of # of Participants:
 - vii. Description/Summary of Results:
 - viii. Was it Effective (Yes or No)?
 - ix. You are required to maintain supporting documentation. What do you have?
 - b. Regarding this year (BMP is planned to be implemented):
 - i. Activity:
 - ii. Responsible Party:
 - iii. Measurable Goal:
 - iv. Theme or Message:
 - v. Target Audience:
 - vi. Estimate of # of Participants:
 - vii. Description/Summary of Planned Activities:
 - viii. Proposed Schedule:

Further Guidance and Information for MCM#2

See the "Additional Information" section of this Storm Water Management Program.

MCM#3: Illicit Discharge Detection and Elimination

General Requirements

As part of its overall Storm Water Management Program, the City of Canton is required to implement a “Storm Water Illicit Discharge Detection and Elimination (IDDE) Program” to detect and eliminate illicit discharges in the City’s storm water drainage system. See “Further Guidance and Information for MCM#3” below for details.

Decision Process for Development of “Illicit Discharge Detection and Elimination (IDDE) Program”

The decision process for the development of an Illicit Discharge Detection and Elimination Program consisted of the following steps, at a minimum:

| Steps to Develop and Implement a “Storm Water Public Involvement/Participation Program” | |
|--|---|
| Step # | Description |
| 1 | Understand permit requirements |
| 2 | Identify and document the City’s decision process for the development of an Illicit Discharge Detection and Elimination Program per permit requirements |
| 3 | Identify and implement program BMPs |
| 4 | Prepare and submit annual reports to Ohio EPA |
| 5 | Evaluate the success of the program annually and make adjustments accordingly |

Additional information pertaining to the decision process is provided below.

Development of Comprehensive Storm Sewer Map

A comprehensive storm system map allows for effective investigations of potential pollution sources as well as providing potential containment and outfall locations for illicit discharges in the MS4. For many years, the City Engineering Department maintained records of City storm and sanitary sewers on hard-copy maps based on plans and as-built information. In 2010, the City completed a base model GIS which incorporated the storm and sanitary sewer information as well as many other attributes such as contours, streets, properties, hydrography, aerial photography, etc. Since then, regular updates to the GIS occur, including information required to satisfy permit requirements. The GIS continues to evolve. Collaboration with Stark County also occurs to share information and avoid duplication of efforts.

Ordinance to Prohibit Illicit Discharges

The City of Canton utilizes an ordinance as the regulatory mechanism to prohibit illicit discharges into the MS4. Ordinances are the typical legislative mechanisms for cities to utilize to formally adopt and meet state and federal regulations and to establish local law.

For many years, various City ordinances were used as appropriate to regulate illicit discharges in the City’s storm water drainage system. However, in 2009, the City adopted a codified “Storm Water Management” ordinance (Chapter 961 of Part Nine - Streets, Utilities, and Public Services Code) which includes prohibitions of illicit discharges into the MS4, violations, enforcement, penalties, etc. Refer to Chapter 961 “Storm Water Management” ordinance for further details.

Parts of the following codified ordinances also assist in the regulation of illicit discharges:

- Chapters 221 “Health Hazards”, 223 “Private Water Systems”, and 225 “Household Sewage Disposal Systems” of Title Three - Environmental Health - of the Canton City Health Code
- Part Five “General Offenses Code”, Part Seven “Business Regulation Code”, Part Nine “Streets, Utilities, and Public Services Code”, and Part Thirteen “Building Code”

Enforcement Procedures

Chapter 961 "Storm Water Management" of the City of Canton codified ordinances includes prohibitions and enforcement mechanisms and procedures to ensure compliance with illicit discharge prohibitions. The ordinance provides for plan denials, Notices Of Violations, Stop Work Orders, injunctive relief, civil proceedings, fines, etc. to be utilized accordingly.

Through a Memorandum of Understanding (MOU) between the City of Canton and the City of Canton Health Department, the Health Department assists in enforcement of violations of Chapter 961 with respect to illicit discharges.

Plan to Detect and Address Illicit Discharges

The City of Canton has its own Health Department. The Ohio Administrative Code and Ohio Revised Code contain provisions for health departments to investigate and abate certain aspects of illicit discharges. In addition, the Canton City Health Department has its own Health Code that regulates certain NPDES storm water-related issues such as household sewage disposal systems (home sewage treatment systems), illegal dumping, various environmental health topics, etc. The City also has existing codified ordinances in place that pertain to illicit/illegal discharges into drainage systems. When necessary, for corresponding violations, appropriate enforcement actions are taken by the City Health Commissioner and/or the City Law Department. All of the City of Canton's codified ordinances can be viewed online at <http://www.conwaygreene.com/canton.htm>.

Most areas within the City of Canton are serviced by sanitary sewer. The City does not have combined sanitary/storm sewers. Sanitary sewer mains within corporate limits are typically owned and maintained by the City, while most of the remaining public sewer mains are owned and maintained by the Stark County Metropolitan Sewer District. However, there are certain addresses within the City where it has been determined that, even though the property is identified as paying for water, it is not identified as paying for sewer. In these "priority areas" areas, homeowners likely maintain private septic systems. Records of these septic systems are maintained by the Stark County and Canton City Health Departments. The Canton City Health Department responds to complaints involving HSTSs and takes the appropriate actions to ensure their proper function.

The City of Canton's plan to detect and address illicit discharges to its MS4 is essentially through the cumulative use of the following:

- ***Illicit discharge prohibition ordinance and enforcement procedures*** – See Chapter 961 "Storm Water Management" of the City of Canton codified ordinances.
- ***IDDE Response Protocol*** - The City of Canton has developed Illicit Discharge Detection and Elimination (IDDE) Response Protocol to establish who to contact and the respective response procedures. The protocol covers illicit discharges ranging from emergencies requiring immediate containment to residential, commercial, or industrial sources, to illegal open dumping, to construction activities, to maintenance responsibilities. The Fire Department, Health Department, and Stark SWCD are the primary respondents to illicit discharges, depending on the sources and types of discharges. Representatives from the Collection Systems Department and/or City Engineering are available to assist as well, especially in utilizing City maps or the GIS to help identify potential drainage paths and outlet points of storm sewers. The Fire Department communicates and coordinates as appropriate with Stark County HazMat and Emergency Preparedness. Provisions are also provided to contact Ohio EPA if an illicit discharge has entered a water of the state or to notify owners of other affected drainage systems. Current IDDE Response Protocol is provided on the City website at: <http://cantonohio.gov/engineering/?pg=510>.
- ***Procedures for locating priority areas with higher likelihood of illicit connections include:***
 - ***Identifying properties with Home Sewage Treatment Systems (HSTSs)*** - The City Health Department has identified all properties in the City with HSTSs. These are considered priority areas because effluent from failing HSTSs often contain pollutant concentrations that exceed established water quality standards, thus becoming illicit discharges. A number of factors can cause on-lot HSTSs to fail, including unsuitable soil conditions, improper design and installation, and inadequate maintenance practices. Chapter 225 of the Canton City Health Code regulates Household Sewage Disposal Systems. The regulations reference Chapter 3701-29 of the Ohio Administrative Code as the minimum compliance standard for enforcement by the City Health Department. Chapter 225 of the Canton City Health Code also prohibits the installation,

maintenance, or operation of HSTSs on property within the City provided a public sanitary sewer is within 200 feet of such property. Registration of HSTS installers and sewage tank cleaners is required with the Health Department. Specific maintenance requirements also apply per Chapter 225. The Health Department has the authority to inspect HSTSs, sample the effluent, or take any other steps deemed necessary to insure proper compliance with OAC 3701-29-01 to 3701-29-21. Chapter 209 of the City Health Code provides for any necessary enforcement, inspection, and penalty. The Health Department maintains all HSTS records for HSTS properties in the City. Due to the availability of sanitary sewer, new applications for HSTS installations are typically denied. According to the Health Department, there are less than 100 HSTS properties in the City, and all of them are "on-lot HSTSs" (there are no "off-lot HSTSs" in the City). This information has been compiled in an HSTS List and Map as required per permit conditions. The City Health Department performs inspections of HSTSs and works with property owners to rectify problematic HSTSs.

- *Monitoring storm and sanitary sewer connections* – All connections to City-owned storm or sanitary sewers are considered priorities because of the potential for cross-connections and illicit discharges. City ordinance Chapters 909 and 961 contain provisions for required permits, fees, and inspections for excavations within City right-of-way as well as for connections to City-owned storm and sanitary sewers. Only sewer contractors licensed by the City are permitting to make connections. Inspections are performed by City inspectors to ensure proper connectivity. Permit and inspection records are maintained by the Civil Engineering Department.
- *Identifying areas with sanitary sewers having high levels of inflow and infiltration (I&I)* – These are considered priorities because they can result in sanitary sewer overflows (SSOs) which could then result in illicit discharges to the MS4. The Collection Systems Department performs routine inspections of sanitary sewers and identifies high I&I areas. Appropriate measures are taken to alleviate I&I as feasible.
- *Addressing illegal dumping* – Illegal dumping is prohibited by Codified Ordinance Chapter 521.08 and is addressed through the City Health Department. Any illegal dumping that results in an illicit discharge to the City's MS4 is handled as such.
- *Follow-up inspections of areas with previous illicit discharges* – Sometimes the City Health Department or Civil Engineering Department will conduct inspections of areas that have had previous illicit discharge incidents.
- ***Procedures for tracing the source of an illicit discharge*** include:
 - *Using IDDE Response Protocol* – Depending on the type of illicit discharge, appropriate first responders (Fire Department, Health Department, or Stark SWCD) are contacted to perform a field investigation. Secondary responders (Collection Systems Department, Civil Engineering, etc.) are sometimes utilized to provide assistance.
 - *Using MS4 maps* - Hard-copy maps of the City's MS4 are utilized, when necessary, by responders to help identify drainage patterns and MS4 connectivity so that discharges can be traced to potential downstream locations as well as source locations. The City's GIS may be utilized when needed and is also available for field-responders through smartphone applications.
 - *Using specific techniques for identifying system connectivity* – Various techniques utilized may include, as appropriate: visual inspection, dye-testing, smoke testing, sewer cameras, line-flushing, etc.
- ***Procedures for removing the source of an illicit discharge*** – Once illicit discharge sources are traced, procedures for source removal are utilized, as appropriate. Many illicit discharges are attributed to accidents (i.e. traffic accidents, accidental spills, etc.) in which dry-absorb materials are typically utilized by first responders. Storm inlet protection or other in-system practices may also be utilized. Illicit discharges that are attributed to improper connections or routine, deliberate occurrences are the ones that require more involved removal procedures. Provisions in City codified ordinance Chapter 961 allow for the issuance of a Notice of Violation to the responsible party. The Notice of Violation sets forth a deadline within which such remediation (removal) or restoration must be completed. The notice further advises that, should the responsible party fail to remediate (remove) or restore within the established deadline, the City has the right to perform said remediation (removal) or restoration, assess

City of Canton Storm Water Management Program

the costs of such work to the responsible person, party, or entity, and initiate any other legal action and administrative penalty for enforcement in accordance with the provisions of Chapter 961. Inspections occur to ensure compliance.

- **Procedures for program evaluation and assessment** – Meetings are held periodically between City departments that are involved in various aspects of the IDDE Plan. Concerns and ideas are discussed and appropriate actions are taken to try to improve the program and meet permit requirements and expectations.
- **Routine televising of sewer lines** – The Collection Systems Department has a sewer-camera truck and a crew. Storm and sanitary sewers are televised to identify conditions and connectivity of sewers so that appropriate decisions can be made and actions taken to address any issues discovered.
- **Inspections of drainage systems** – Drainage systems are often inspected by the Collection Systems Department or Civil Engineering Department.
- **Training of employees to identify illicit discharges** – Part of the employee training materials purchased by the City include an IDDE training kit which includes a video, quizzes, trainer’s guide, pocket references, and other resources. Certain departments that have employees that may be more likely to identify illicit discharges are expected to train their employees accordingly.
- **Dry-weather field screenings of storm water outfalls** – All storm water outfalls from City MS4s have been inspected during dry weather in accordance with permit requirements. Dry weather flows have been evaluated accordingly. Most are attributed to ground water flow. Others have been attributed to illicit discharges that have since been corrected. When additional screenings occur, special attention will be paid to outfalls that have had previously-identified dry weather flows so that appropriate actions can be taken to address any newly-found or suspected illicit discharges.

Through Memorandums of Understanding (MOUs):

- The City Health Department assists in response, investigation, and enforcement of non-emergency illicit discharges in the City’s MS4 from residential, commercial, or industrial sources and illegal open dumping;
- Stark SWCD assists in response and investigation of non-emergency illicit discharges in the City’s MS4 from construction activities regulated by NPDES Construction Storm Water Permits.

Informing Public Employees, Businesses, and the General Public of Hazards Associated with Illegal Discharges and Improper Disposal of Waste

A variety of mechanisms have been used and are available for use to provide trash management education and warnings about the improper disposal of waste:

- “Stark County Recycling News” is a publication that is sent annually to every household in the Stark-Tuscarawas-Wayne counties Recycling District, which includes the City of Canton. This publication is a household guide to recycling and proper waste disposal and provides other valuable information such as details about the City of Canton’s Recycling Center which is the district’s year-round, no-cost household hazardous waste collection site.
- The City’s Sanitation Department distributes trash management educational flyers to all new sanitation customers and upon request.
- A variety of information and links are provided on the Sanitation department’s webpage regarding trash management.
- City Engineering’s Storm Water Education webpage contains information pertaining to hazards associated with the improper disposal of waste.
- Other mechanisms and similar themes may be used. See Minimum Control Measure #1 for details.

Since this requirement is of a “public education” nature, themes used to satisfy MCM#1 will also include hazards associated with illegal discharges and improper disposal of waste. Training materials used to satisfy MCM#6 employee training requirements include this theme as well.

Responsible Parties for Implementing the Storm Water Illicit Discharge Detection and Elimination Program

The City of Canton Service Director is responsible for the overall compliance of the City with the NPDES Storm Water Permit requirements. Coordination of the SWMP is delegated to the Assistant City Engineer of the Civil Engineering

City of Canton Storm Water Management Program

Department. Responsibility for implementation of *certain* BMPs has been assigned to *specific* departments. *Other* BMPs may be implemented by *any* department *as feasible*. See Best Management Practices (BMPs) below and the Table of Organization for details. As BMPs are implemented, each respective responsible position is required to maintain appropriate supporting documentation.

Best Management Practices (BMPs)

Aside from Minimum Control Measure #3 BMPs that may be described above, the table below also lists certain BMPs that are expected or required to be implemented by certain departments, while others are shown as recommendations for potential implementation depending on applicability and/or feasibility. Recommendations are based on USEPA and NEOSWTC recommendations:

- USEPA has prepared “BMP Fact Sheets” and other resources related to many BMPs in the City’s Storm Water Management Program. They can be found on the *National Menu of Best Management Practices (BMPs) for Stormwater* webpage by clicking on the respective Minimum Control Measure tabs. The BMP Fact Sheets provide further explanation, applicability, recommendations, implementation, and effectiveness information of common BMPs. Fact sheets and resources should be reviewed periodically by employees who are involved in respective BMP implementation. See “Further Guidance and Information for MCM#3” below.
- The Northeast Ohio Storm Water Training Council (NEOSWTC) has prepared “TMDL Fact Sheets” pertaining to respective Nimishillen Creek TMDLs and corresponding recommended BMPs to address the TMDLs. In order to meet permit requirements, appropriate BMPs must be selected to address TMDL recommendations. Therefore, some of the recommended BMPs are to be utilized as part of the City’s Illicit Discharge Detection and Elimination Program.

Depending on whether or not a BMP is a requirement or recommendation, measurable goals have been written accordingly. Annual Reports will document exactly which BMPs were implemented in the previous year as well as identify possible BMPs to be implemented in the upcoming year.

City of Canton Storm Water Management Program

Minimum Control Measure #3
 Illicit Discharge Detection and Elimination
 Best Management Practices (BMPs)

See footnotes at end of table

| # | BMP | | Responsible Party | Legal Authority ? | Measurable Goals | | Address TMDLs? |
|----|--|-------------------------------------|--------------------------------------|-------------------|---|------------------------------------|----------------|
| | Name | Justification | | | (Schedules, Frequency, Etc.) | Justification | |
| 1 | Storm Sewer System Map showing the location of all outfalls and the names and location of all surface waters of the state that receive discharges from the outfalls. Include all MS4 components: catch basins, pipes, detention/retention facilities, post-construction BMPs, etc. | Required by permit | Civil Engineering | Yes | <ul style="list-style-type: none"> Maintain and update map as needed to meet permit requirements; Annual Reporting requirements⁷ | Required | Yes |
| 1a | Maintain and continue updating the MS4 map on an annual basis... | Recommended by NEOSWTC ¹ | Civil Engineering | Yes | Implement recommendation | Continuous/ongoing/as-needed basis | Yes |
| 2 | HSTS List of HSTSs connected to discharge to the City's MS4, including addresses | Required by permit | Health | Yes | <ul style="list-style-type: none"> Maintain and update list as needed to meet permit requirements; Provide list and updates to Civil Engineering; Annual Reporting requirements⁷ | Required | Yes |
| 2a | Develop and maintain a list of STSs that discharge to your MS4; | Recommended by NEOSWTC ¹ | Health | Yes | Implement recommendation | Continuous/ongoing/as-needed basis | Yes |
| 3 | HSTS Map showing the locations of all HSTSs connected to the City's MS4, including details on the type and size of receiving systems - Based on the HSTS List provided by the City Health Department, HSTSs have been added to the City's GIS. There are only "on-lot HSTSs" in the City of Canton. | Required by permit | Civil Engineering | Yes | <ul style="list-style-type: none"> Maintain and update map as needed to meet permit requirements; Annual Reporting requirements⁷ | Required | Yes |
| 3a | Develop and maintain a map of STSs that discharge to your MS4 | Recommended by NEOSWTC ¹ | Civil Engineering | Yes | Implement recommendation | Continuous/ongoing/as-needed basis | Yes |
| 4 | Illicit Discharge Ordinance that effectively prohibits illicit discharges into the City's storm sewer system | Required by permit | Civil Engineering | Yes | <ul style="list-style-type: none"> Update ordinance as needed to meet permit requirements; Annual Reporting requirements⁷ | Required | No |
| 5 | IDDE Plan to detect and eliminate non-storm water discharges, including illegal | Required by permit | Civil Engineering; CSD; Development; | Yes | <ul style="list-style-type: none"> Implement requirement; Annual Reporting requirements⁷ | Continuous/ongoing/as-needed basis | Yes |

**Minimum Control Measure #3
 Illicit Discharge Detection and Elimination
 Best Management Practices (BMPs)**

See footnotes at end of table

| BMP | | Name | Justification | Responsible Party | Legal Authority ? | Measurable Goals | | Address TMDLs? |
|-----|--|---|---|---|-------------------|------------------------------|---|----------------|
| # | | | | | | (Schedules, Frequency, Etc.) | Justification | |
| | | <p>dumping, to the City's MS4. Involvement in this BMP may include, but is not limited to:</p> <ul style="list-style-type: none"> • Inspection, management, or elimination of Home Sewage Treatment Systems (HSTSSs/septic systems) • Expansion of sanitary sewer systems to areas not served by sanitary sewers • Informing public employees, businesses, and/or the general public of hazards associated with illegal discharges and improper disposal of waste • Inspection of commercial or industrial facilities to identify potential sources of illicit discharges • Identifying and/or investigating illicit discharges into the City's MS4 • Addressing illegal dumping into the City's storm water drainage systems • Enforcement of violations of illicit discharges into the City's storm water drainage systems | | <p>Fire; Health; Planning; Service Director; Stark SWCD; [Any other applicable department]</p> | | | | |
| 5a | | <p>Work with local health department to routinely inspect Sewage Treatment Systems (STSS) to ensure proper operation and maintenance</p> | <p>Recommended by NEOSWTC¹</p> | <p>Health</p> | <p>Yes</p> | <p>Implement requirement</p> | <p>Continuous/ongoing/as-needed basis</p> | <p>Yes</p> |
| 5b | | <p>Work with local health department to eliminate illicit discharges from failing STSS (i.e. installation of sanitary sewer; convert to on-lot STS (non-discharging); or replacement</p> | <p>Recommended by NEOSWTC¹</p> | <p>Health</p> | <p>Yes</p> | <p>Implement requirement</p> | <p>Continuous/ongoing/as-needed basis</p> | <p>Yes</p> |

**Minimum Control Measure #3
 Illicit Discharge Detection and Elimination
 Best Management Practices (BMPs)**

See footnotes at end of table

| # | BMP | | Responsible Party | Legal Authority ? | Measurable Goals | | Address TMDLs? |
|----|---|---|--|-------------------|------------------------------|------------------------------------|----------------|
| | Name | Justification | | | (Schedules, Frequency, Etc.) | Justification | |
| | | of STSs with coverage under residential NPDES permit (discharging)) | | | | | |
| 5c | Work with local health department to identify and prioritize solutions to failing STSs | Recommended by NEOSWTC ¹ | Health; [All other applicable departments] | Yes | Implement recommendation | Continuous/ongoing/as-needed basis | Yes |
| 5d | "Preventing septic system failure" ² | Recommended by USEPA ² | Health | Yes | Implement recommendation | Continuous/ongoing/as-needed basis | Yes |
| 5e | Develop and implement measures to eliminate confirmed cross-connections that are contributing to illicit discharges | Recommended by NEOSWTC ¹ | Civil Engineering; CSD; Health | Yes | Implement requirement | Continuous/ongoing/as-needed basis | Yes |
| 5f | Develop an IDDE Plan that clearly defines the department(s) and/or agency(ies) responsible for investigating and resolving confirmed sources of illicit discharges | Recommended by NEOSWTC ¹ | Civil Engineering; CSD; Fire; Health; Service Director; Stark SWCD | Yes | Implement requirement | Continuous/ongoing/as-needed basis | Yes |
| 5g | Develop an enforcement escalation plan that outlines how your community will address illicit discharges: <ul style="list-style-type: none"> Clearly define enforcement roles between affected agencies; Work with local health department to identify and eliminate failing STSs; Establish timeframes for investigation and elimination | Recommended by NEOSWTC ¹ | Civil Engineering; Health; Service Director | Yes | Implement requirement | Continuous/ongoing/as-needed basis | Yes |
| 5h | Establish an IDDE surveillance plan focused on sources of bacteria, nutrients, or habitat such as: <ul style="list-style-type: none"> Sewage Treatment Systems; Cross-connections; Infiltration and Inflow (I&I); Animal waste (agricultural and pet); | Recommended by NEOSWTC ¹ | Civil Engineering; CSD; Health; Stark SWCD | Yes | Implement requirement | Continuous/ongoing/as-needed basis | Yes |

**Minimum Control Measure #3
 Illicit Discharge Detection and Elimination
 Best Management Practices (BMPs)**

See footnotes at end of table

| # | BMP | | Justification | Responsible Party | Legal Authority ? | Measurable Goals (Schedules, Frequency, Etc.) | | Justification | Address TMDLs? |
|----|---|-----------------------------------|--|-------------------|--|--|-----------------------|---------------|----------------|
| | Name | | | | | | | | |
| | <ul style="list-style-type: none"> Grass clippings and yard waste; Construction sites | | | | | | | | |
| 5i | "Reducing the occurrence of Sanitary Sewer Overflows (SSOs)" ² | Recommended by USEPA ² | CSD | Yes | Implement recommendation ⁵ | Continuous/ongoing/as-needed basis | No | | |
| 5j | "Illegal dumping control" ² | Recommended by USEPA ² | Health | Yes | Implement recommendation ⁵ | Continuous/ongoing/as-needed basis | Yes | | |
| 5k | "Trash and debris management" ² | Recommended by USEPA ² | Health; Sanitation | Yes | Implement recommendation ⁵ | Continuous/ongoing/as-needed basis | Yes | | |
| 5l | "Sewage from recreational activities" ² | Recommended by USEPA ² | Health | Yes | Implement recommendation ⁵ | Continuous/ongoing/as-needed basis | Yes | | |
| 6 | Inform public employees on hazards associated with illegal discharges and improper disposal of waste | Required by permit | Building; Building Maintenance; Civil Engineering; CSD; DMV; Fire; Health; Parks & Recreation; Police (Impound Lot); Sanitation; Street; Traffic; Sign & Paint; Water; WRF | Yes | Implement requirement in conjunction with required employee training (MCM#6) | Continuous/ongoing/as-needed basis | Possibly ⁶ | | |
| 7 | Inform businesses and the general public of hazards associated with illegal discharges and improper disposal of waste | Required by permit | [Any Department] | Yes | [TBD ³]; Coordinate with MCM#1 ^{4,5} | Pending | Possibly ⁶ | | |

City of Canton Storm Water Management Program

Minimum Control Measure #3
 Illicit Discharge Detection and Elimination
 Best Management Practices (BMPs)

See footnotes at end of table

| # | BMP | | Responsible Party | Legal Authority ? | Measurable Goals | | Address TMDLs? |
|-----|---|---|---|-------------------|---|-------------------------------------|---------------------|
| | Name | Justification | | | (Schedules, Frequency, Etc.) | Justification | |
| 8 | Address specifically-identified non-storm water discharges of concern | Required by permit <i>only if</i> identified as significant contributors of pollutants to MS4 | Service Director | Yes | Implement only as needed per permit | Pending | [TBD ³] |
| 9 | List of allowable non-storm water discharges | Optional per permit | Service Director | Yes | Implement only as needed per permit | Continuous/on-going/as-needed basis | No |
| 10 | Initial dry-weather screening of outfalls over the permit term | Required by permit | Civil Engineering | Yes | <ul style="list-style-type: none"> Perform initial screening as required; Annual Reporting requirements⁷ | Required | Yes |
| 10a | Based on data collected from previous screenings, establish a prioritization schedule for ongoing dry-weather screening of outfalls | Recommended by NEOSWTC ¹ | Civil Engineering | Yes | Implement recommendation ⁵ | Pending | Yes |
| 10b | Ensure that IDDE surveillance program includes commitments to perform annual dry weather screening in areas where at least one previous test indicated elevated bacteria levels | Recommended by NEOSWTC ¹ | Civil Engineering | Yes | Implement recommendation ⁵ | Pending | Yes |
| 10c | Perform at least one screening of all outfalls per permit term | Recommended by NEOSWTC ¹ | Civil Engineering | Yes | Implement recommendation | Required | Yes |
| 11 | Document in the SWMP how community emergency spill response and cleanup plans are communicated and coordinated between applicable agencies and/or departments | Recommended by NEOSWTC ¹ | Civil Engineering | Yes | Recommendation implemented | | Yes |
| 12 | Train street, service, public works, building, and parks and recreation staff to identify sources of illicit discharges | Recommended by NEOSWTC ¹ | Building; CSD; Parks & Recreation; Sanitation; | Yes | Implement recommendation in conjunction with required employee training (MCM#6) | Continuous/on-going/as-needed basis | Yes |

**Minimum Control Measure #3
Illicit Discharge Detection and Elimination
Best Management Practices (BMPs)**

See footnotes at end of table

| # | BMP | | Justification | Responsible Party | Legal Authority ? | Measurable Goals | | Address TMDLs? |
|----|--|--|-------------------------------------|--------------------------------|---------------------|---------------------------------------|------------------------------------|---------------------|
| | Name | | | | | (Schedules, Frequency, Etc.) | Justification | |
| | | | | Street | | | | |
| 13 | Establish a schedule for regular meetings or other communications between third party service providers (e.g. health department, SWCD, etc.) and the MS4 manager | | Recommended by NEOSWTC ¹ | Civil Engineering | Yes | Implement recommendation | Continuous/ongoing/as-needed basis | Yes |
| 14 | "Developing a Used Oil Recycling Program" ² | | Recommended by USEPA ² | Service Director | [TBD ³] | Implement recommendation ⁵ | [TBD ³] | [TBD ³] |
| 15 | "Community hotlines" ² | | Recommended by USEPA ² | Service Director | [TBD ³] | Implement recommendation ⁵ | [TBD ³] | [TBD ³] |
| 16 | [Other MCM#3 BMPs ^{1,2,3,4,5}] | | [TBD ³] | [Any Department ³] | [TBD ³] | [TBD ³] | [TBD ³] | [TBD ³] |

¹ Specific BMPs that address TMDLs are recommended by the Northeast Ohio Stormwater Training Council (NEOSWTC). See Total Maximum Daily Loads section of SWMP.

² See USEPA's National Menu of Best Management Practices (BMPs) for Stormwater at:

<https://www.epa.gov/npdes/national-menu-best-management-practices-bmps-stormwater#il>.

³ To be determined.

⁴ As applicable.

⁵ As feasible.

⁶ TMDLs may be addressed if specific themes are included per MCM#1 that address TMDLs.

⁷ See "Annual Reporting for MCM#3" below.

Evaluating the Success of MCM#3

There are various ways to measure the City of Canton's success of implementing Minimum Control Measure #3:

- Assess individual BMPs to determine if they have been implemented in accordance with measurable goals, MCM performance standards, and applicable EPA and NEOSWTC recommendations.
- Annual Reports will provide indication of the status of implementation.
- The Storm Water Program Coordinator will conduct an annual review of the program with the Service Director so that appropriate adjustments and actions can be taken.
- Ohio EPA or other entities may conduct sampling of the Nimishillen Creek to determine if corresponding pollutant levels have decreased.
- Ohio EPA may perform audits of the City's Storm Water Management Program.

Annual Reporting for MCM#3

Whenever any of the following BMPs are implemented or are planned to be implemented, the responsible party will need to track corresponding information. The Storm Water Management Program Coordinator will send out annual questionnaires to departments requesting the respective information and possibly other information as well. The information provided will then be utilized to prepare Annual Reports that will be submitted as required to Ohio EPA.

- **Illicit Discharge Ordinance:**

- a. Regarding the previous year (BMP was implemented):

- i. Responsible Party:
 - ii. Measurable Goal:
 - iii. Completed (Yes or No)?
 - iv. Cite Local Code(s) Being Used (If available, web link for code(s)):
 - v. Summary of Results or Activities:
 - vi. Was it Effective (Yes or No)?
 - vii. You are required to maintain supporting documentation. What do you have?

- b. Regarding this year (BMP is planned to be implemented):

- i. Responsible Party:
 - ii. Measurable Goal:
 - iii. Summary of Planned Activities:
 - iv. Proposed Schedule:

- **Storm Sewer System Map:**

- a. Regarding the previous year (BMP was implemented):

- i. Responsible Party:
 - ii. Measurable Goal:
 - iii. Completed (Yes or No)?
 - iv. Summary of Activities or Updates:
 - v. Was it Effective (Yes or No)?
 - vi. You are required to maintain supporting documentation. What do you have?

- b. Regarding this year (BMP is planned to be implemented):

- i. Responsible Party:
 - ii. Measurable Goal:
 - iii. Summary of Planned Activities:
 - iv. Proposed Schedule:

- **HSTS List and Map:**

- a. Regarding the previous year (BMP was implemented):

- i. **HSTS List:**

- 1. Responsible Party:
 - 2. Measurable Goal:
 - 3. Completed (Yes or No)?

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4. Summary of Activities or Updates:
 5. Was it Effective (Yes or No)?
 6. You are required to maintain supporting information. What do you have?
- ii. **HSTS Map:**
 1. Responsible Party:
 2. Measurable Goal:
 3. Completed (Yes or No)?
 4. Summary of Activities or Updates:
 5. Was it Effective (Yes or No)?
 6. You are required to maintain supporting information. What do you have?
- b. Regarding this year (BMP is planned to be implemented):
 - i. **HSTS List:**
 1. Responsible Party:
 2. Measurable Goal:
 3. Summary of Planned Activities:
 4. Proposed Schedule:
 - ii. **HSTS Map:**
 1. Responsible Party:
 2. Measurable Goal:
 3. Summary of Planned Activities:
 4. Proposed Schedule:
- **IDDE Plan:**
 - a. Regarding the previous year (BMP was implemented):
 - i. Describe your department's involvement:
 - ii. Responsible Party:
 - iii. Measurable Goal:
 - iv. Completed (Yes or No)?
 - v. Summary of Activities or Updates:
 - vi. Was it Effective (Yes or No)?
 - vii. You are required to maintain supporting documentation. What do you have?
 - b. Regarding this year (BMP is planned to be implemented):
 - i. Responsible Party:
 - ii. Measurable Goal:
 - iii. Summary of Planned Activities:
 - iv. Proposed Schedule:
- **Dry-Weather Screening of Outfalls:**
 - a. Regarding the previous year (BMP was implemented):
 - i. Total # of Outfalls:
 - ii. Responsible Party:
 - iii. Measurable Goal:
 - iv. Completed (Yes or No)?
 - v. # of Outfalls Screened:
 - vi. # of Dry-Weather Flows Identified:
 - vii. # of Illicit Discharges Identified:
 - viii. # of Illicit Discharges Eliminated:
 - ix. Was it Effective (Yes or No)?
 - x. You are required to maintain supporting documentation. What do you have?
 - b. Regarding this year (BMP is planned to be implemented):
 - i. Responsible Party:
 - ii. Measurable Goal:
 - iii. Summary of Planned Activities:

iv. Proposed Schedule:

Further Guidance and Information for MCM#3

See the "Additional Information" section of this Storm Water Management Program.

MCM#4: Construction Site Storm Water Runoff Control

General Requirements

As part of its overall Storm Water Management Program, the City of Canton is required to implement a “Construction Site Storm Water Control Program” to reduce pollutants in storm water runoff to the City’s storm water drainage system from construction activities that result in land disturbances of one or more acres. See “Further Guidance and Information for MCM#4” below for details.

Decision Process for Development of “Construction Site Storm Water Control Program”

The decision process for the development of a Construction Site Storm Water Control Program consisted of the following steps, at a minimum:

| Steps to Develop and Implement a “Construction Site Storm Water Control Program” | |
|---|--|
| Step # | Description |
| 1 | Understand permit requirements |
| 2 | Identify and document the City’s decision process for the development of a Construction Site Storm Water Control Program per permit requirements |
| 3 | Identify and implement program BMPs |
| 4 | Prepare and submit annual reports to Ohio EPA |
| 5 | Evaluate the success of the program annually and make adjustments accordingly |

Additional information pertaining to the decision process is provided below.

Ordinance to Require Erosion and Sediment Controls

The City of Canton utilizes an ordinance as the regulatory mechanism to require erosion and sediment controls at construction sites that disturb one or more total acres of land. Ordinances are the typical legislative mechanisms for cities to utilize to formally adopt and meet state and federal regulations and to establish local law.

In 2009, the City adopted a codified "Storm Water Management" ordinance (Chapter 961 of Part Nine - Streets, Utilities, and Public Services Code) which included the adoption of a “City of Canton Storm Water Management Manual”. The Storm Water Management Manual provides policy, standards, applicability, criteria, requirements, recommendations, and guidance for general storm water drainage, storm water quantity management, and storm water quality management. It was prepared and is maintained by the City Engineering Department. The storm water quality management requirements - which include erosion and sediment controls - are based on the current Ohio EPA NPDES Construction Storm Water Permit requirements. The current version of the City of Canton Storm Water Management Manual is available on the Storm Water Management page of City Engineering’s website at: <http://cantonohio.gov/engineering/?pg=510>.

Ensuring Compliance with the Erosion and Sediment Control Ordinance

All construction activities that disturb one or more total acres of land in the City of Canton subject to the storm water quality requirements of the City of Canton Storm Water Management Manual. Through a Memorandum Of Understanding (MOU), Stark SWCD review Storm Water Pollution Prevention Plans and conducts inspections of applicable sites for compliance with requirements. The Storm Water Management Ordinance includes sanctions and enforcement mechanisms to ensure compliance. The ordinance provides for plan denials, Notices Of Violations (NOVs), Stop Work Orders, injunctive relief, civil proceedings, fines, etc. to be utilized accordingly. Stark SWCD is authorized through the MOU to issue NOVs. For sites that do not comply with NOV conditions, Stark SWCD notifies the City so that further actions can occur accordingly.

Requirements for Erosion and Sediment Control BMPs

Storm water quality management requirements of the City of Canton Storm Water Management Manual are based, at a minimum, of the technical requirements of the current Ohio EPA NPDES Construction Storm Water Permit requirements.

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Requirements for construction site operators to implement appropriate erosion and sediment control BMPs and control waste (discarded building materials, concrete truck washouts, chemicals, litter, sanitary waste, etc.) are included. BMPs are required to comply with provisions of ODNR's Rainwater and Land Development Manual, at a minimum. See the City of Canton Storm Water Management Manual for additional information.

Procedures for Storm Water Pollution Prevention Plan Reviews

All construction activities that disturb one or more total acres of land in the City of Canton are required by the Planning and Zoning Code to have a site plan submitted for review by several City departments that make up the City's Site Plan Review Committee. The City of Canton Storm Water Management Manual requires site plans to include a Storm Water Pollution Prevention Plan (SWP3) for applicable sites. Thus, 100% of sites in the City that will disturb one or more total acres of land are required to have site plans and SWP3s reviewed prior to construction. Through a Memorandum Of Understanding (MOU), Stark SWCD is considered a member of the City's Site Plan Review Committee. Stark SWCD reviews SWP3s for compliance with the storm water quality management requirements of the City of Canton Storm Water Management Manual. Site plans are not approved by the City unless Stark SWCD has approved of respective SWP3s. See the City of Canton Storm Water Management Manual for additional information.

A "City of Canton Permits and Plan Review Process" flowchart is available on the Engineering Department's website at: <http://cantonohio.gov/engineering/>.

Procedures for Receipt and Consideration of Information Submitted by the Public

The public is welcomed to attend regular City Council meetings, contact any City department or Stark SWCD as necessary to relay questions and concerns about current or proposed construction activities within the City. The City does its best to answer questions and consider information submitted by the public regarding proposed development. Through an MOU, Stark SWCD addresses complaints related to construction activities by site investigation with an appropriate letter, email, meeting, or phone call to follow-up the investigation. If Stark SWCD is unable to address the issue, an appropriate City representative becomes involved.

A "City of Canton Drainage Complaint General Guidance" table is available on the Storm Water Management page of the Engineering Department's website at: <http://cantonohio.gov/engineering/?pg=510>.

Procedures for Site Inspection and Enforcement

Through an MOU, Stark SWCD conducts routine inspections of sites that are subject to storm water quality management requirements to ensure SWP3s are implemented as approved. Monthly inspections of active sites (those that have ongoing construction activities) are conducted, at a minimum. All active sites are considered priorities. Once construction activities are completed and the sites are stabilized, a final inspection by Stark SWCD occurs. See the City of Canton Storm Water Management Manual for additional information.

The Storm Water Management Ordinance includes sanctions and enforcement mechanisms to ensure compliance. The ordinance provides for plan denials, Notices Of Violations (NOVs), Stop Work Orders, injunctive relief, civil proceedings, fines, etc. to be utilized accordingly. Stark SWCD is authorized through the MOU to issue NOVs. For sites that do not comply with NOV conditions, Stark SWCD notifies the City so that further actions can occur accordingly.

Responsible Parties for Implementing the Construction Site Storm Water Control Program

The City of Canton Service Director is responsible for the overall compliance of the City with the NPDES Storm Water Permit requirements. Coordination of the SWMP is delegated to the Assistant City Engineer of the Civil Engineering Department. Responsibility for implementation of *certain* BMPs has been assigned to *specific* departments. *Other* BMPs may be implemented by *any* department *as feasible*. See Best Management Practices (BMPs) below and the Table of Organization for details. As BMPs are implemented, each respective responsible position is required to maintain appropriate supporting documentation.

Best Management Practices (BMPs)

Aside from Minimum Control Measure #4 BMPs that may be described above, the table below also lists certain BMPs that are expected or required to be implemented by certain departments, while others are shown as recommendations for potential implementation depending on applicability and/or feasibility. Recommendations are based on USEPA and NEOSWTC recommendations:

- USEPA has prepared “BMP Fact Sheets” and other resources related to many BMPs in the City’s Storm Water Management Program. They can be found on the *National Menu of Best Management Practices (BMPs) for Stormwater* webpage by clicking on the respective Minimum Control Measure tabs. The BMP Fact Sheets provide further explanation, applicability, recommendations, implementation, and effectiveness information of common BMPs. Fact sheets and resources should be reviewed periodically by employees who are involved in respective BMP implementation. See “Further Guidance and Information for MCM#4” below.
- The Northeast Ohio Storm Water Training Council (NEOSWTC) has prepared “TMDL Fact Sheets” pertaining to respective Nimishillen Creek TMDLs and corresponding recommended BMPs to address the TMDLs. In order to meet permit requirements, appropriate BMPs must be selected to address TMDL recommendations. Therefore, some of the recommended BMPs are to be utilized as part of the City’s Construction Site Storm Water Control Program.

Depending on whether or not a BMP is a requirement or recommendation, measurable goals have been written accordingly. Annual Reports will document exactly which BMPs were implemented in the previous year as well as identify possible BMPs to be implemented in the upcoming year.

Minimum Control Measure #4
 Construction Site Storm Water Runoff Control
 Best Management Practices (BMPs)

See footnotes at end of table

| # | BMP | | Responsible Party | Legal Authority? | Measurable Goals | | Address TMDLs? |
|----|---|-------------------------------------|-------------------|------------------|--|---------------|----------------|
| | Name | Justification | | | (Schedules, Frequency, Etc.) | Justification | |
| 1 | Construction Site Runoff Ordinance | Required by permit | Civil Engineering | Yes | <ul style="list-style-type: none"> Update ordinance as needed to meet permit requirements; implement recommendations^{4,5}; Annual Reporting requirements⁶ | Required | Yes |
| 1a | Update existing construction runoff control code to meet or exceed the requirements of the NPDES Construction General Permit (OHC000004), including the federal effluent limitations in Part II | Recommended by NEOSWTC ¹ | Civil Engineering | Yes | Recommendation implemented | | Yes |
| 1b | <ul style="list-style-type: none"> Require on-site protected areas (i.e. wetlands, riparian areas, other valuable resources) to be physically marked in the field prior to commencement of earth-disturbing activities | Recommended by NEOSWTC ¹ | Civil Engineering | Yes | Implement recommendation ⁵ | Pending | Yes |
| 1c | <ul style="list-style-type: none"> Require 50-ft natural vegetative buffers to be maintained between the limits of disturbance and water resources | Recommended by NEOSWTC ¹ | Civil Engineering | Yes | Implement recommendation ⁵ | Pending | Yes |
| 1d | <ul style="list-style-type: none"> Maintain wetlands in their natural states wherever feasible | Recommended by NEOSWTC ¹ | Civil Engineering | Yes | Implement recommendation ⁵ | Pending | Yes |
| 2 | Construction Site Storm Water Quality Requirements | Required by permit | Civil Engineering | Yes | <ul style="list-style-type: none"> Update requirements as needed to meet permit requirements; implement recommendations^{4,5}; Annual Reporting requirements⁶ | Required | Yes |

City of Canton Storm Water Management Program

Minimum Control Measure #4
Construction Site Storm Water Runoff Control
Best Management Practices (BMPs)

See footnotes at end of table

| # | BMP | | Responsible Party | Legal Authority? | Measurable Goals | | Address TMDLs? |
|----|--|-------------------------------------|-------------------|------------------|---|------------------------------------|----------------|
| | Name | Justification | | | (Schedules, Frequency, Etc.) | Justification | |
| 2a | Ensure most current erosion, sediment, and non-sediment control BMP standards are required to be utilized (e.g. Rainwater & Land Development Manual) | Recommended by NEOSWTC ¹ | Civil Engineering | Yes | Recommendation implemented | Required | Yes |
| 3 | SWP3 Reviews (for construction site storm water quality management) | Required by permit | Stark SWCD | Yes, via MOU | Continue to implement requirement | Required | Yes |
| 3a | Complete Storm Water Pollution Prevention Plan (SWP3) reviews and approvals prior to construction commencement | Recommended by NEOSWTC ¹ | Stark SWCD | Yes, via MOU | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Yes |
| 4 | Complaint Process | Required by permit | Stark SWCD | Yes, via MOU | <ul style="list-style-type: none"> Receive and consider information submitted by the public; Annual Reporting requirements⁶ | Required | Yes |
| 4a | Establish a standard operating procedure to respond to complaints | Recommended by NEOSWTC ¹ | Stark SWCD | Yes, via MOU | Recommendation implemented | Required | Yes |
| 5 | Site Inspection Procedures (for construction site storm water BMPs) ² | Required by permit | Stark SWCD | Yes, via MOU | <ul style="list-style-type: none"> Conduct monthly site inspections, at a minimum, on applicable construction sites; Annual Reporting requirements⁶ | Required | Yes |
| 5a | Conduct site inspections to ensure SWP3 implementation | Recommended by NEOSWTC ¹ | Stark SWCD | Yes, via MOU | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Yes |
| 5b | Require MS4 compliance inspectors to provide a written report of findings to | Recommended by NEOSWTC ¹ | Stark SWCD | Yes, via MOU | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Yes |

City of Canton Storm Water Management Program

Minimum Control Measure #4
Construction Site Storm Water Runoff Control
Best Management Practices (BMPs)

See footnotes at end of table

| # | BMP Name | Justification | Responsible Party | Legal Authority? | Measurable Goals | | Address TMDLs? |
|----|--|-------------------------------------|----------------------------------|---|---|------------------------------------|----------------|
| | | | | | (Schedules, Frequency, Etc.) | Justification | |
| | construction site operators for every site inspection; the report would summarize compliance and non-compliance matters and establish deadlines for corrective action | | | | | | |
| 6 | Compliance and Enforcement Procedures | Required by permit | Stark SWCD; Civil Engineering | Stark SWCD: Yes, via MOU; Civil Engineering: Yes | <ul style="list-style-type: none"> Enforce ordinance accordingly; Annual Reporting requirements⁶ | Required | Yes |
| 6a | Establish a protocol for enforcement escalation of your community's construction runoff control code | Recommended by NEOSWTC ¹ | Civil Engineering | Yes | Recommendation implemented | | Yes |
| 6b | Develop an enforcement escalation plan that outlines how and when your community will address non-compliance with approved erosion, sediment, and non-sediment control plans | Recommended by NEOSWTC ¹ | Civil Engineering | Yes | Recommendation implemented | | Yes |
| 7 | Protect and maintain wetlands in their natural states – wetlands filter nitrogen as well as other nutrients and pollutants ² | Recommended by NEOSWTC ¹ | [All applicable departments] | Yes | Implement recommendation | Continuous/ongoing/as-needed basis | Yes |
| 8 | Protect and maintain natural vegetative buffers to filter storm water runoff ² | Recommended by NEOSWTC ¹ | [All applicable departments] | Yes | Implement recommendation | Continuous/ongoing/as-needed basis | Yes |
| 9 | Ensure portable toilets are maintained and emptied without spills | Recommended by NEOSWTC ¹ | [All applicable departments] | Yes | Implement recommendation | Continuous/ongoing/as-needed basis | Yes |
| 10 | Maintain a map of active construction sites to more easily identify watersheds being impacted by construction site runoff and prioritize sites in those watersheds for | Recommended by NEOSWTC ¹ | Stark SWCD | Yes | Implement recommendation ⁵ | Pending | Yes |

**Minimum Control Measure #4
Construction Site Storm Water Runoff Control
Best Management Practices (BMPs)**

See footnotes at end of table

| # | BMP | | Justification | Responsible Party | Legal Authority? | Measurable Goals | | Address TMDLs? |
|----|--|-------------------------------------|------------------------------------|-------------------------|---------------------------------------|------------------------------------|---------------------|----------------|
| | Name | | | | | (Schedules, Frequency, Etc.) | Justification | |
| | inspections more frequently than once a month | | | | | | | |
| 11 | Establish a Sediment and Erosion Control Bond equivalent to the cost to stabilize (vegetate) disturbed areas of respective sites in case of non-performance (i.e. developer foreclosure/bankruptcy) | Recommended by NEOSWTC ¹ | [All applicable departments] | [TBD ³] | Implement recommendation ⁵ | Pending | Yes | |
| 12 | Establish a schedule for regular meetings or other communications between third-party service providers (e.g. health department, SWCD, etc.) and the MS4 manager | Recommended by NEOSWTC ¹ | Civil Engineering; Stark SWCD | Yes | Implement recommendation | Continuous/ongoing/as-needed basis | Yes | |
| 13 | Ensure proper storage of landscape materials on construction sites | Recommended by NEOSWTC ¹ | [All applicable departments] | Yes | Implement recommendation | Continuous/ongoing/as-needed basis | Yes | |
| 14 | [Any construction site runoff control BMPs as recommended by USEPA ²] | Recommended by USEPA ² | [All applicable departments] | [TBD ^{3,4,5}] | Implement recommendation ⁵ | Pending | [TBD ³] | |
| 15 | [Other MCM#4 BMPs ^{1,2,3,4,5}] | [TBD ^{3,4,5}] | [Any Department ^{3,4,5}] | [TBD ³] | [TBD ³] | [TBD ³] | [TBD ³] | |

¹ Specific BMPs that address TMDLs are recommended by the Northeast Ohio Stormwater Training Council (NEOSWTC). See Total Maximum Daily Loads section of SWMP.

² See USEPA's National Menu of Best Management Practices (BMPs) for Stormwater at:

<https://www.epa.gov/npdes/national-menu-best-management-practices-bmps-stormwater#constr>.

³ To be determined.

⁴ As applicable.

⁵ As feasible.

⁶ See "Annual Reporting for MCM#4" below.

Evaluating the Success of MCM#4

There are various ways to measure the City of Canton's success of implementing Minimum Control Measure #4:

- Assess individual BMPs to determine if they have been implemented in accordance with measurable goals, MCM performance standards, and applicable EPA and NEOSWTC recommendations.
- Annual Reports will provide indication of the status of implementation.
- The Storm Water Program Coordinator will conduct an annual review of the program with the Service Director so that appropriate adjustments and actions can be taken.
- Ohio EPA or other entities may conduct sampling of the Nimishillen Creek to determine if corresponding pollutant levels have decreased.
- Ohio EPA may perform audits of the City's Storm Water Management Program.

Annual Reporting for MCM#4

Whenever any of the following BMPs are implemented or are planned to be implemented, the responsible party will need to track corresponding information. The Storm Water Management Program Coordinator will send out annual questionnaires to departments requesting the respective information and possibly other information as well. The information provided will then be utilized to prepare Annual Reports that will be submitted as required to Ohio EPA.

- **Construction Site Runoff Ordinance:**

- a. Regarding the previous year (BMP was implemented):

- i. Responsible Party:
 - ii. Measurable Goal:
 - iii. Completed (Yes or No)?
 - iv. Cite Local Code(s) Being Used (If available, web link for code(s)):
 - v. Summary of Results or Activities:
 - vi. Was it Effective (Yes or No)?
 - vii. You are required to maintain supporting documentation. What do you have?

- b. Regarding this year (BMP is planned to be implemented):

- i. Responsible Party:
 - ii. Measurable Goal:
 - iii. Summary of Planned Activities:
 - iv. Proposed Schedule:

- **Sediment and Erosion Control Requirements:**

- a. Regarding the previous year (BMP was implemented):

- i. Responsible Party:
 - ii. Measurable Goal:
 - iii. Completed (Yes or No)?
 - iv. Standards Being Used:
 - v. Summary of Results or Activities:
 - vi. Were they Effective (Yes or No)?
 - vii. You are required to maintain supporting documentation. What do you have?

- b. Regarding this year (BMP is planned to be implemented):

- i. Responsible Party:
 - ii. Measurable Goal:
 - iii. Summary of Planned Activities:
 - iv. Proposed Schedule:

- **Complaint Process:**

- a. Regarding the previous year (BMP was implemented):

- i. Describe your department's involvement:
 - ii. Responsible Party:
 - iii. Measurable Goal:

City of Canton Storm Water Management Program

- iv. Completed (Yes or No)?
 - v. # of Complaints Received:
 - vi. # of Complaints Responded to:
 - vii. Summary of Results or Activities:
 - viii. Was it Effective (Yes or No)?
 - ix. You are required to maintain supporting documentation. What do you have?
 - b. Regarding this year (BMP is planned to be implemented):
 - i. Responsible Party:
 - ii. Measurable Goal:
 - iii. Summary of Planned Activities:
 - iv. Proposed Schedule:
- **Site Plan Review Procedures:**
 - a. Regarding the previous year (BMP was implemented):
 - i. Responsible Party:
 - ii. Measurable Goal:
 - iii. Completed (Yes or No)?
 - iv. # of Applicable Sites Requiring Plans:
 - v. # of Plans Reviewed:
 - vi. Summary of Results or Activities:
 - vii. Were they Effective (Yes or No)?
 - viii. You are required to maintain supporting documentation. What do you have?
 - b. Regarding this year (BMP is planned to be implemented):
 - i. Responsible Party:
 - ii. Measurable Goal:
 - iii. Summary of Planned Activities:
 - iv. Proposed Schedule:
- **Site Inspection Procedures:**
 - a. Regarding the previous year (BMP was implemented):
 - i. Responsible Party:
 - ii. Measurable Goal:
 - iii. Completed (Yes or No)?
 - iv. # of Applicable Sites:
 - v. # of Site Inspections Performed:
 - vi. Average Frequency of Inspections:
 - vii. Summary of Results or Activities:
 - viii. Were they Effective (Yes or No)?
 - ix. You are required to maintain supporting documentation. What do you have?
 - b. Regarding this year (BMP is planned to be implemented):
 - i. Responsible Party:
 - ii. Measurable Goal:
 - iii. Summary of Planned Activities:
 - iv. Proposed Schedule:
- **Enforcement Procedures:**
 - a. Regarding the previous year (BMP was implemented):
 - i. Responsible Party:
 - ii. Measurable Goal:
 - iii. Completed (Yes or No)?
 - iv. # of Violation Letters:
 - v. # of Enforcement Actions:
 - vi. Summary of Results or Activities:

City of Canton Storm Water Management Program

- vii. Were they Effective (Yes or No)?
- viii. You are required to maintain supporting documentation. What do you have?
- b. Regarding this year (BMP is planned to be implemented):
 - i. Responsible Party:
 - ii. Measurable Goal:
 - iii. Summary of Planned Activities:
 - iv. Proposed Schedule:

Further Guidance and Information for MCM#4

See the "Additional Information" section of this Storm Water Management Program.

MCM#5: Post-Construction Storm Water Management in New Development and Redevelopment

General Requirements

As part of its overall Storm Water Management Program, the City of Canton is required to implement a “Post-Construction Storm Water Management Program” to address storm water runoff to the City’s storm water drainage system from new development and redevelopment projects that disturb one or more acres. See “Further Guidance and Information for MCM#5” below for details.

Decision Process for the Development of “Post-Construction Storm Water Management Program”

The decision process for the development of a Construction Site Storm Water Control Program consisted of the following steps, at a minimum:

| Steps to Develop and Implement a “Post-Construction Storm Water Management Program” | |
|--|---|
| Step # | Description |
| 1 | Understand permit requirements |
| 2 | Identify and document the City’s decision process for the development of a Post-Construction Storm Water Management Program per permit requirements |
| 3 | Identify and implement program BMPs |
| 4 | Prepare and submit annual reports to Ohio EPA |
| 5 | Evaluate the success of the program annually and make adjustments accordingly |

Additional information pertaining to the decision process is provided below.

Addressing Storm Water Runoff from New Development and Redevelopment

The City of Canton’s program to address storm water runoff from new development and redevelopment applies to all projects that disturb one or more total acres of land within the City of Canton. Post-construction storm water quality management (pollution control) as well as post-construction storm water quantity management (flood control) are required in accordance with provisions of the City of Canton Storm Water Management Manual. The City of Canton and Stark SWCD have a Memorandum Of Understanding (MOU) which details Stark SWCD’s responsibilities to review Storm Water Pollution Prevention Plans (SWP3s), inspections applicable projects, provide certain enforcement actions, and perform other functions pertaining to post-construction storm water management in the City of Canton.

How the Program is Specifically Tailored for the City of Canton

The City of Canton is required by Ohio EPA to implement a Post-Construction Storm Water Management Program in accordance with NPDES Small MS4 Permit requirements. The program has been and is being implemented to address permit requirements. Ways in which the program is specifically tailored for the City of Canton to minimize water quality impacts include, but are not limited to:

- *Implementation of BMPs to address TMDLs* – The permit requires the implementation of BMPs to address applicable TMDLs. Since the City of Canton is located within the Nimishillen Creek watershed, recommended BMPs to address Nimishillen Creek watershed TMDLs have been included to be implemented as part of the program.
- *The use of applicable local master plans and comprehensive plans, planning and zoning ordinances, local storm water management regulations, etc.*
- *The use of Stark SWCD (see above).*
- *The review of site plans in accordance with City of Canton requirements.* A “City of Canton Permits and Plan Review Process” flowchart is available on the Engineering Department’s website at: <http://cantonohio.gov/engineering/>.

Ways in which the program is specifically tailored to the City of Canton to attempt to maintain pre-development runoff conditions include, but are not limited to:

City of Canton Storm Water Management Program

- *Post-construction storm water quantity (i.e. detention) requirements* - Detention criteria in many communities limits post-developed discharges from a site to not exceed pre-developed discharges for the 2-, 5-, 10-, 25-, 50-, and 100-year storm events. However, in the City of Canton, detention criterion is different in that it typically does not allow post-developed discharges to exceed the minimum capacity of the downstream receiving system. This also helps to control flooding and downstream erosion. Detailed criterion is provided in the City of Canton Storm Water Management Manual.

Structural and Non-Structural BMPs

According to the Ohio EPA Post-Construction Q&A Document, post-construction BMPs fall into one of two categories: structural or non-structural BMPs. Structural BMPs are practices that must be built to provide treatment of storm water either through storage, filtration, or infiltration. Non-structural BMPs generally consist of preservation, planning, or procedures that direct development away from water resources or limit the creation of impervious surfaces. The City of Canton's Post-Construction Storm Water Management Program encourages a mixture of structural and non-structural BMPs but essentially allows and encourages any non-structural BMPs found in ODNR's Rainwater and Land Development Manual, Ohio EPA's Construction Storm Water Permit, Ohio EPA's Post-Construction Q&A Document, or as recommended by the NEOSWTC - as long as they are in conformance with local laws and regulations. See Best Management Practices (BMPs) below for details.

Ordinance Addressing Post-Construction Runoff

The City of Canton utilizes an ordinance as the regulatory mechanism to address post-construction runoff from new development and redevelopment projects that disturb one or more total acres of land. Ordinances are the typical legislative mechanisms for cities to utilize to formally adopt and meet state and federal regulations and to establish local law.

In 2009, the City adopted a codified "Storm Water Management" ordinance (Chapter 961 of Part Nine - Streets, Utilities, and Public Services Code) which included the adoption of a "City of Canton Storm Water Management Manual". The Storm Water Management Manual provides policy, standards, applicability, criteria, requirements, recommendations, and guidance for general storm water drainage, storm water quantity management, and storm water quality management. It was prepared and is maintained by the City Engineering Department. The storm water quality management requirements – which include post-construction storm water management - are primarily based on the current Ohio EPA NPDES Construction Storm Water Permit requirements. The current version of the City of Canton Storm Water Management Manual is available on the Storm Water Management page of City Engineering's website at: <http://cantonohio.gov/engineering/?pg=510>.

Ensuring Long-Term Operation and Maintenance of Post-Construction BMPs

All permanent post-construction BMPs required to be installed per the City of Canton Storm Water Management Manual are also required to have a Long-Term Maintenance Plan (LTMP). The LTMP is required to be prepared by the regulated party, contain various contents pertaining to responsibilities, BMP maintenance information, and other information, and signed by the responsible party. Through an MOU between the City of Canton and Stark SWCD, Stark SWCD reviews LTMPs, performs annual inspections of post-construction BMPs (except for alternative BMPs), and provides inspection letters to the responsible party and the City of Canton. Inspection letters detail any maintenance needs or other issues and an associated timeline for completion. See the City of Canton Storm Water Management Manual for details. If the maintenance items or other issues are not addressed by the responsible party in the timeline given, Stark SWCD will notify the City of Canton so that the City can take the appropriate actions in accordance with provisions of Chapter 961 "Storm Water Management". Post-construction BMPs that release illicit discharges to the City's MS4 are also subject to enforcement via Chapter 961.

Responsible Parties for Implementing the Post-Construction Storm Water Management Program

The City of Canton Service Director is responsible for the overall compliance of the City with the NPDES Storm Water Permit requirements. Coordination of the SWMP is delegated to the Assistant City Engineer of the Civil Engineering Department. Responsibility for implementation of *certain* BMPs has been assigned to *specific* departments. *Other* BMPs may be implemented by *any* department *as feasible*. See Best Management Practices (BMPs) below and the Table of

City of Canton Storm Water Management Program

Organization for details. As BMPs are implemented, each respective responsible position is required to maintain appropriate supporting documentation.

Best Management Practices (BMPs):

Aside from Minimum Control Measure #5 BMPs that may be described above, the table below also lists certain BMPs that are expected or required to be implemented by certain departments, while others are shown as recommendations for potential implementation depending on applicability and/or feasibility. Recommendations are based on USEPA, NEOSWTC, and permit recommendations:

- USEPA has prepared “BMP Fact Sheets” and other resources related to many BMPs in the City’s Storm Water Management Program. They can be found on the *National Menu of Best Management Practices (BMPs) for Stormwater* webpage by clicking on the respective Minimum Control Measure tabs. The BMP Fact Sheets provide further explanation, applicability, recommendations, implementation, and effectiveness information of common BMPs. Fact sheets and resources should be reviewed periodically by employees who are involved in respective BMP implementation. See “Further Guidance and Information for MCM#5” below.
- The Northeast Ohio Storm Water Training Council (NEOSWTC) has prepared “TMDL Fact Sheets” pertaining to respective Nimishillen Creek TMDLs and corresponding recommended BMPs to address the TMDLs. In order to meet permit requirements, appropriate BMPs must be selected to address TMDL recommendations. Therefore, some of the recommended BMPs are to be utilized as part of the City’s Post-Construction Storm Water Management Program.

Depending on whether or not a BMP is a requirement or recommendation, measurable goals have been written accordingly. Annual Reports will document exactly which BMPs were implemented in the previous year as well as identify possible BMPs to be implemented in the upcoming year.

Minimum Control Measure #5

Post-Construction Storm Water Management in New Development and Redevelopment
Best Management Practices (BMPs)

See footnotes at end of table

| # | BMP | | Responsible Party | Legal Authority ? | Measurable Goals | | Address TMDLs? |
|----|---|-------------------------------------|-------------------|-------------------|---|---------------|----------------|
| | Name | Justification | | | (Schedules, Frequency, Etc.) | Justification | |
| 1 | Post-Construction Storm Water Management Ordinance | Required by permit | Civil Engineering | Yes | <ul style="list-style-type: none"> Update ordinance as needed to meet permit requirements; Annual Reporting requirements⁶ | Required | Yes |
| 1a | Update existing storm water management code to meet or exceed the requirements of NPDES OHC000004, including the federal effluent limitations in Part II | Recommended by NEOSWTC ¹ | Civil Engineering | Yes | Recommendation implemented | | Yes |
| 1b | <p>Include at least one of the following in your storm water management code:</p> <ul style="list-style-type: none"> Require on-site protected areas (i.e. wetlands, riparian areas, other valuable resources) to be physically marked in the field prior to commencement of earth-disturbing activities Prioritize and incentivize the following types of post-construction BMPs: <ul style="list-style-type: none"> Infiltration basins and trenches with appropriate pretreatment, e.g. vegetated swales, filter strips, etc. Wet extended detention basins Dry extended detention basins with forebays and micropools Bioretention areas with internal water storage Constructed wetlands that provide extended detention of the water quality volume (WQv) Permeable pavement with internal water storage Tree box filters | Recommended by NEOSWTC ¹ | Civil Engineering | Yes | Recommendation implemented – the City of Canton Storm Water Management Manual requires post-construction BMPs in accordance with NPDES Construction Storm Water Permit requirements | | Yes |
| 2 | Post-Construction Requirements ² | Required by permit | Civil Engineering | Yes | <ul style="list-style-type: none"> Update requirements as needed to meet permit requirements; Annual Reporting requirements⁶ | Required | Yes |

**Minimum Control Measure #5
Post-Construction Storm Water Management in New Development and Redevelopment
Best Management Practices (BMPs)**

See footnotes at end of table

| # | BMP | | Responsible Party | Legal Authority ? | Measurable Goals | | Address TMDLs? |
|----|---|--|---|---------------------|--|------------------------------------|---------------------|
| | Name | Justification | | | (Schedules, Frequency, Etc.) | Justification | |
| 2a | Ensure the most current post-construction BMP standards are required to be utilized (e.g. Rainwater & Land Development Manual) | Recommended by NEOSWTC ¹ | Civil Engineering | Yes | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Yes |
| 2b | Update the design specification for bioretention to require internal water storage whenever feasible for additional nitrogen treatment (as recommended by ODNR's Rainwater & Land Development Manual) | Recommended by NEOSWTC ¹ | Civil Engineering | Yes | Implement recommendation ⁵ | Pending | Yes |
| 2c | Select post-construction BMPs that eliminate or minimize bacteria, such as bioretention and constructed wetlands (as recommended by ODNR's Rainwater & Land Development Manual) | Recommended by NEOSWTC ¹ | Civil Engineering | Yes | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Yes |
| 2d | Allow or require vegetative practices (taller native grasses, etc.) around storm water management ponds that discourage waterfowl | Recommended by NEOSWTC ¹ | Civil Engineering; [Other applicable departments] | Yes | Continue to allow vegetative practices around storm water management ponds | Continuous/ongoing/as-needed basis | Yes |
| 2e | Require or allow non-structural BMPs such as: • Conservation easements | Recommended by Ohio EPA's Post-Construction Q&A Document | Development; Civil Engineering; Planning; Zoning | [TBD ³] | Implement recommendations ⁵ | Pending | [TBD ³] |
| 2f | Require or allow non-structural BMPs such as: • Riparian and wetland setbacks | Recommended by Ohio EPA's Post-Construction Q&A Document | Development; Civil Engineering; Planning; Zoning | [TBD ³] | Implement recommendations ⁵ | Pending | [TBD ³] |
| 2g | Require or allow non-structural BMPs such as: • Rain barrels to capture and reuse storm water | Recommended by Ohio EPA's Post-Construction Q&A Document | Development; Civil Engineering; Planning; Zoning | [TBD ³] | Implement recommendations ⁵ | Pending | [TBD ³] |

Minimum Control Measure #5

Post-Construction Storm Water Management in New Development and Redevelopment
Best Management Practices (BMPs)

See footnotes at end of table

| # | BMP | | Responsible Party | Legal Authority ? | Measurable Goals | | Address TMDLs? |
|----|--|--|---|---------------------|---|------------------------------|---------------------|
| | Name | Justification | | | (Schedules, Frequency, Etc.) | Justification | |
| 2h | Require or allow non-structural BMPs such as: • Breaking up the connectivity between impervious surfaces | Recommended by Ohio EPA's Post-Construction Q&A Document | Development; Civil Engineering; Planning; Zoning | [TBD ³] | Implement recommendations ⁵ | Pending | [TBD ³] |
| 2i | Require or allow non-structural BMPs such as: • Use of permeable pavements | Recommended by Ohio EPA's Post-Construction Q&A Document | Development; Civil Engineering; Planning; Zoning | [TBD ³] | Implement recommendations ⁵ | Pending | [TBD ³] |
| 2j | Require or allow non-structural BMPs such as: • Conservation subdivision design (subdivisions which leave 40-50% of the land in open space and place developed areas away from important water resources, yet still allow the same lot yield as traditional subdivision design) | Recommended by Ohio EPA's Post-Construction Q&A Document | Development; Planning; Zoning | [TBD ³] | Implement recommendations ⁵ | Pending | [TBD ³] |
| 2k | Require or allow non-structural BMPs such as: • Green infrastructure storm water management techniques | Recommended by permit | Development; Civil Engineering; Planning; Zoning | [TBD ³] | Implement recommendations ⁵ | Pending | [TBD ³] |
| 2l | Adopt Non-structural BMPs such as: • Policies and ordinances that provide requirements and standards to direct growth to identified areas, protect sensitive areas such as wetlands and riparian areas, maintain and/or increase open space, provide buffers along sensitive water bodies, minimize impervious surfaces, and minimize disturbance of soils and vegetation | Recommended by permit | Development; Civil Engineering; Planning; Zoning | [TBD ³] | Implement recommendations ⁵ ; Planning and zoning ordinances implemented - The City's Planning & Zoning Code regulates development within all areas of the City in accordance with respective zone classifications. • Chapter 1132 "Flood Hazard District" generally restricts development adjacent to certain water bodies within the City. | Pending; Some implemented | [TBD ³] |

**Minimum Control Measure #5
Post-Construction Storm Water Management in New Development and Redevelopment
Best Management Practices (BMPs)**

See footnotes at end of table

| # | BMP | | Responsible Party | Legal Authority ? | Measurable Goals | | Address TMDLs? |
|----|--|-----------------------|--------------------------------------|-------------------|--|-----------------------|----------------|
| | Name | Justification | | | (Schedules, Frequency, Etc.) | Justification | |
| | | | | | <ul style="list-style-type: none"> Chapter 1133 "Open Space District" reserves areas for public parks and recreation, and promotes the conservation of natural resources including land and water conservation and wildlife refuges, and agricultural areas. Other chapters regulate residential, business, and industrial districts, with certain requirements for building setbacks, maximum % of lot coverage, and minimum percent of lot landscaping, as applicable. Chapter 1143 "Planned Unit Development Districts" promotes "low impact development" philosophy such as the preservation and utilization of natural topography, geologic features, scenic vistas, green areas, requiring open spaces, minimizing impervious areas, preventing the disruption of natural drainage patterns, etc. | | |
| 2m | Adopt Non-structural BMPs such as: <ul style="list-style-type: none"> Policies and ordinances that encourage infill development in higher density urban areas, and areas with existing storm sewer infrastructure | Recommended by permit | Development; Planning; Zoning | Yes | Infill Residential Development Ordinance (#217-2005) implemented - The ordinance provides that lots created prior to 1979 and held in separate ownership from adjoining and/or abutting property and less than the required lot area and width requirements of the applicable zoning district shall be deemed buildable lots if all of the following apply: the lot frontage is not less than 45 feet; the total area of the lot is not less than 4,500 square feet; and over 65% of the properties within 300 feet of the same street frontage of the lot are the same or less than the lot in question and are developed with a permitted residential structure. Any | Possibly ¹ | |

**Minimum Control Measure #5
Post-Construction Storm Water Management in New Development and Redevelopment
Best Management Practices (BMPs)**

See footnotes at end of table

| # | BMP | | Responsible Party | Legal Authority ? | Measurable Goals | | Address TMDLs? |
|----|---|--|---|-------------------------|--|--------------------------------------|-----------------------|
| | Name | Justification | | | (Schedules, Frequency, Etc.) | Justification | |
| 2n | Provide Non-structural BMPs such as: • Education programs for developers and the public about project designs that minimize water quality impacts | Recommended by permit | [Any applicable department] Stark SWCD | Yes Yes, via MOU | Implement recommendation ⁵ As described in MCM#1, Stark SWCD provides training and education for the development community, typically through annual workshops. These could be considered education programs for developers about project designs that minimize water quality impacts. | Pending Possibly ¹ | [TBD ³] |
| 2o | Require or allow non-structural BMPs such as: • Other measures such as minimization of the percentage of impervious area after development , use of measures to minimize directly-connected impervious areas , and source control measures such as good housekeeping, preventative maintenance, and spill prevention | Recommended by permit | Development; Civil Engineering; Planning; Zoning; [Any other applicable department] | [TBD ³] | Implement recommendations ⁵ | Pending | [TBD ³] |
| 2p | Require or allow structural BMPs such as: • Extended detention basins • Bioretention cells • Sand filters • Vegetated filter strips • Water quality swales • Infiltration trenches | Recommended by Ohio EPA's Post-Construction Q&A Document | Civil Engineering | Yes | Continue to implement recommendations | Continuous/on-going/as-needed basis | Possibly ¹ |
| 2q | Require or allow structural BMPs such as: • Green infrastructure storm water management techniques | Recommended by permit | Development; Civil Engineering; Planning; | | Implement recommendations ⁵ | Pending | [TBD ³] |

**Minimum Control Measure #5
Post-Construction Storm Water Management in New Development and Redevelopment
Best Management Practices (BMPs)**

See footnotes at end of table

| # | BMP | | Responsible Party | Legal Authority ? | Measurable Goals | | Address TMDLs? |
|----|--|-------------------------------------|-------------------|-------------------|--|------------------------------------|-----------------------|
| | Name | Justification | | | (Schedules, Frequency, Etc.) | Justification | |
| | | | Zoning | | | | |
| 2r | Require or allow structural BMPs such as: <ul style="list-style-type: none"> Storage practices such as wet ponds and extended detention structures Filtration practices such as grassed swales, bioretention cells, sand filters and filter strips Infiltration practices such as infiltration basins and infiltration trenches | Recommended by permit | Civil Engineering | Yes | Continue to implement recommendations | Continuous/ongoing/as-needed basis | Possibly ¹ |
| 3 | SWP3 Reviews (for post-construction storm water quality management) ² | Required by permit | Stark SWCD | Yes, via MOU | <ul style="list-style-type: none"> Conduct SWP3 reviews for applicable sites; Annual Reporting requirements⁶ | Required | Yes |
| 3a | Complete Storm Water Pollution Prevention Plan (SWP3) reviews and approvals prior to construction commencement | Recommended by NEOSWTC ¹ | Stark SWCD | Yes, via MOU | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Yes |
| 3b | Review 100% of SWP3s where the larger common plan of development disturbs one or more acres | Recommended by NEOSWTC ¹ | Stark SWCD | Yes, via MOU | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Yes |
| 4 | Site Inspection Procedures (for post-construction site storm water BMPs) ² | Required by permit | Stark SWCD | Yes, via MOU | <ul style="list-style-type: none"> Conduct inspections of applicable construction sites to ensure post-construction BMPs are installed per requirements; Annual Reporting requirements⁶ | Required | Yes |
| 4a | Conduct monthly site inspections throughout construction, as well as a final site inspection to ensure implementation of post-construction BMPs in the approved SWP3 | Recommended by NEOSWTC ¹ | Stark SWCD | Yes, via MOU | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Yes |
| 4b | Require MS4 compliance inspectors to provide a written report of findings to construction site operators for every site inspection; the report would summarize compliance and non-compliance matters and establish a deadline for corrective action | Recommended by NEOSWTC ¹ | Stark SWCD | Yes, via MOU | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Yes |

**Minimum Control Measure #5
Post-Construction Storm Water Management in New Development and Redevelopment
Best Management Practices (BMPs)**

See footnotes at end of table

| # | BMP | | Responsible Party | Legal Authority ? | Measurable Goals | | Address TMDLs? |
|----|---|-------------------------------------|-------------------|-------------------|--|------------------------------------|----------------|
| | Name | Justification | | | (Schedules, Frequency, Etc.) | Justification | |
| 5 | Compliance and Enforcement Procedures² | Required by permit | Stark SWCD | Yes | <ul style="list-style-type: none"> Enforce ordinance accordingly; Annual Reporting requirements⁶ | Required | Yes |
| 5a | Develop an enforcement escalation plan that outlines how and when your community will address non-compliance with approved storm water management plans | Recommended by NEOSWTC ¹ | Civil Engineering | Yes | Recommendation implemented | | Yes |
| 6 | Ensure adequate long-term operation and maintenance of post-construction BMPs² | Required by permit | Stark SWCD | Yes, via MOU | <ul style="list-style-type: none"> Ensure Long-Term O&M Plans are in place and conduct annual inspections of applicable BMPs; Annual Reporting requirements⁶ | Required | Yes |
| 6a | Ensure SWP3 includes an executed Maintenance Agreement and Long-Term Maintenance Plan for post-construction BMPs | Recommended by NEOSWTC ¹ | Stark SWCD | Yes, via MOU | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Yes |
| 6b | Establish a program to ensure long-term maintenance of post-construction BMPs including a protocol for enforcement escalation of your storm water management codes | Recommended by NEOSWTC ¹ | Civil Engineering | Yes | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Yes |
| 6c | Prior to commencing earth-disturbing activities, ensure 100% of applicable sites have a fully executed Maintenance Agreement for the site, including an approved Maintenance Plan for each post-construction BMP | Recommended by NEOSWTC ¹ | Stark SWCD | Yes, via MOU | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Yes |
| 6d | Require an applicable community department (e.g. SWCD, Engineering) to annually inspect public and private post-construction BMPs , or require private property owners to submit an annual maintenance report. Ensure | Recommended by NEOSWTC ¹ | Stark SWCD | Yes, via MOU | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Yes |

**Minimum Control Measure #5
Post-Construction Storm Water Management in New Development and Redevelopment
Best Management Practices (BMPs)**

See footnotes at end of table

| # | BMP | | Justification | Responsible Party | Legal Authority ? | Measurable Goals | | Address TMDLs? |
|----|---|-------------------------------------|------------------------------|---------------------|---|------------------------------------|---------------|----------------|
| | Name | Justification | | | | (Schedules, Frequency, Etc.) | Justification | |
| | corrective actions are performed as needed by the applicable party. | | | | | | | |
| 6e | Conduct a physical inspection of BMPs at least once during the NPDES permit term | Recommended by NEOSWTC ¹ | Stark SWCD | Yes, via MOU | Conduct annual inspections of post-construction BMPs that discharge to a City MS4 | Continuous/ongoing/as-needed basis | Yes | |
| 7 | Establish a performance bond for post-construction BMPs and require documentation of acceptance before releasing bond; | Recommended by NEOSWTC ¹ | [All applicable departments] | [TBD ³] | Implement recommendation ⁵ | Pending | Yes | |
| 8 | Establish a Sediment and Erosion Control Bond equivalent to the cost to stabilize (vegetate) disturbed areas of respective sites in cases of non-performance (i.e. developer foreclosure/bankruptcy) | Recommended by NEOSWTC ¹ | [All applicable departments] | [TBD ³] | Implement recommendation ⁵ | Pending | Yes | |
| 9 | Require submittal of as-built drawings for post-construction BMPs to ensure installment | Recommended by NEOSWTC ¹ | Stark SWCD | Yes, via MOU | Require as-built drawings for all underground post-construction BMPs and other BMPs as directed | Continuous/ongoing/as-needed basis | Yes | |
| 10 | Adopt at least one of the following planning and development codes: <ul style="list-style-type: none"> • Conservation development² • Riparian and wetland setbacks² • Downspout disconnections (redirect flow to rain gardens, rain barrel systems, and/or filter strips) | Recommended by NEOSWTC ¹ | Development; Zoning | [TBD ³] | Implement recommendation ⁵ | Pending | Yes | |
| 11 | Adopt into planning and development codes: <ul style="list-style-type: none"> • Revised parking codes² (e.g. decrease overall number of spaces, allow alternative pervious materials, shared parking, etc.) | Recommended by NEOSWTC ¹ | Development; Zoning | [TBD ³] | Implement recommendation ⁵ | Pending | Yes | |
| 12 | Incentivize the following within existing developed areas: <ul style="list-style-type: none"> • Retrofitting of storm water management control systems to increase infiltration and to function as constructed wetlands² | Recommended by NEOSWTC ¹ | Development | [TBD ³] | Implement recommendation ⁵ | Pending | Yes | |

**Minimum Control Measure #5
Post-Construction Storm Water Management in New Development and Redevelopment
Best Management Practices (BMPs)**

See footnotes at end of table

| # | BMP | | Responsible Party | Legal Authority ? | Measurable Goals | | Address TMDLs? |
|----|--|-------------------------------------|------------------------------------|-------------------------|--|---------------------|---------------------|
| | Name | Justification | | | (Schedules, Frequency, Etc.) | Justification | |
| 13 | Incentivize the following within existing developed areas: <ul style="list-style-type: none"> Encourage commercial, industrial, and institutional land owners to reduce impervious surfaces and replace them with storm water practices that infiltrate, capture and reuse, or otherwise reduce storm water runoff such as permeable pavement, cisterns, infiltration basins and trenches, bioretention with internal water storage, etc. | Recommended by NEOSWTC ¹ | Development | [TBD ³] | Implement recommendation ⁵ | Pending | Yes |
| 14 | Incentivize the following within existing developed areas: <ul style="list-style-type: none"> Implement practices that deter waterfowl around storm water ponds | Recommended by NEOSWTC ¹ | Development | [TBD ³] | Implement recommendation ⁵ | Pending | Yes |
| 15 | Incentivize the following within existing developed areas: <ul style="list-style-type: none"> Retrofitting of storm water management control systems to treat the WQv and/or increase infiltration² | Recommended by NEOSWTC ¹ | Development | [TBD ³] | Implement recommendation ⁵ | Pending | Yes |
| 16 | [Any post-construction BMPs as recommended by USEPA ²] | Recommended by USEPA ² | [All applicable departments] | [TBD ^{3,4,5}] | Implement recommendations ⁵ | Pending | [TBD ³] |
| 17 | [Other MCM#5 BMPs ^{1,2,3,4,5}] | [TBD ^{3,4,5}] | [Any Department ^{3,4,5}] | [TBD ³] | [TBD ³] | [TBD ³] | [TBD ³] |

¹ Specific BMPs that address TMDLs are recommended by the Northeast Ohio Stormwater Training Council (NEOSWTC). See Total Maximum Daily Loads section of SWMP.

² See USEPA's National Menu of Best Management Practices (BMPs) for Stormwater at:

<https://www.epa.gov/npdes/national-menu-best-management-practices-bmps-stormwater#post>.

³ To be determined.

⁴ As applicable.

⁵ As feasible.

⁶ See "Annual Reporting for MCM#5" below.

Evaluating the Success of MCM#5

There are various ways to measure the City of Canton’s success of implementing Minimum Control Measure #5:

- Assess individual BMPs to determine if they have been implemented in accordance with measurable goals, MCM performance standards, and applicable EPA and NEOSWTC recommendations.
- Annual Reports will provide indication of the status of implementation.
- The Storm Water Program Coordinator will conduct an annual review of the program with the Service Director so that appropriate adjustments and actions can be taken.
- Ohio EPA or other entities may conduct sampling of the Nimishillen Creek to determine if corresponding pollutant levels have decreased.
- Ohio EPA may perform audits of the City’s Storm Water Management Program.

Annual Reporting for MCM#5

Whenever any of the following BMPs are implemented or are planned to be implemented, the responsible party will need to track corresponding information. The Storm Water Management Program Coordinator will send out annual questionnaires to departments requesting the respective information and possibly other information as well. The information provided will then be utilized to prepare Annual Reports that will be submitted as required to Ohio EPA.

- **Post-Construction Storm Water Management Ordinance:**
 - a. Regarding the previous year (BMP was implemented):
 - i. Responsible Party:
 - ii. Measurable Goal:
 - iii. Completed (Yes or No)?
 - iv. Cite Local Code(s) Being Used (If available, web link for code(s)):
 - v. Summary of Results or Activities:
 - vi. Was it Effective (Yes or No)?
 - vii. You are required to maintain supporting documentation. What do you have?
 - b. Regarding this year (BMP is planned to be implemented):
 - i. Responsible Party:
 - ii. Measurable Goal:
 - iii. Summary of Planned Activities:
 - iv. Proposed Schedule:
- **Post-Construction Requirements:**
 - a. Regarding the previous year (BMP was implemented):
 - i. Responsible Party:
 - ii. Measurable Goal:
 - iii. Completed (Yes or No)?
 - iv. Structural and/or Non-Structural Standards Being Used:
 - v. Summary of Results or Activities:
 - vi. Were they Effective (Yes or No)?
 - vii. You are required to maintain supporting documentation. What do you have?
 - b. Regarding this year (BMP is planned to be implemented):
 - i. Responsible Party:
 - ii. Measurable Goal:
 - iii. Summary of Planned Activities:
 - iv. Proposed Schedule:
- **Site Plan Review Procedures:**
 - a. Regarding the previous year (BMP was implemented):
 - i. Responsible Party:
 - ii. Measurable Goal:
 - iii. Completed (Yes or No)?

City of Canton Storm Water Management Program

- iv. # of Applicable Sites Requiring Post-Construction Storm Water Quality Management:
- v. # of Plans Reviewed:
- vi. Summary of Results or Activities:
- vii. Were they Effective (Yes or No)?
- viii. You are required to maintain supporting documentation. What do you have?
- b. Regarding this year (BMP is planned to be implemented):
 - i. Responsible Party:
 - ii. Measurable Goal:
 - iii. Summary of Planned Activities:
 - iv. Proposed Schedule:

- **Site Inspection Procedures:**

- a. Regarding the previous year (BMP was implemented):
 - i. Responsible Party:
 - ii. Measurable Goal:
 - iii. Completed (Yes or No)?
 - iv. # of Site Inspections Performed:
 - v. Average Frequency of Inspections:
 - vi. Summary of Results or Activities:
 - vii. Were they Effective (Yes or No)?
 - viii. You are required to maintain supporting documentation. What do you have?
- b. Regarding this year (BMP is planned to be implemented):
 - i. Responsible Party:
 - ii. Measurable Goal:
 - iii. Summary of Planned Activities:
 - iv. Proposed Schedule:

- **Enforcement Procedures:**

- a. Regarding the previous year (BMP was implemented):
 - i. Responsible Party:
 - ii. Measurable Goal:
 - iii. Completed (Yes or No)?
 - iv. # of Violation Letters:
 - v. # of Enforcement Actions:
 - vi. Summary of Results or Activities:
 - vii. Were they Effective (Yes or No)?
 - viii. You are required to maintain supporting documentation. What do you have?
- b. Regarding this year (BMP is planned to be implemented):
 - i. Responsible Party:
 - ii. Measurable Goal:
 - iii. Summary of Planned Activities:
 - iv. Proposed Schedule:

- **Long-Term O&M Plans/Agreements:**

- a. Regarding the previous year (BMP was implemented):
 - i. Responsible Party:
 - ii. Measurable Goal:
 - iii. Completed (Yes or No)?
 - iv. # of Sites Requiring Plans/Agreements:
 - v. # of Plans Developed/Agreements in Place:
 - vi. Summary of Results or Activities:
 - vii. Were they Effective (Yes or No)?
 - viii. You are required to maintain supporting documentation. What do you have?

City of Canton Storm Water Management Program

- b. Regarding this year (BMP is planned to be implemented):
 - i. Responsible Party:
 - ii. Measurable Goal:
 - iii. Summary of Planned Activities:
 - iv. Proposed Schedule:

Further Guidance and Information for MCM#5

See the "Additional Information" section of this Storm Water Management Program.

MCM#6: Pollution Prevention/Good Housekeeping for Municipal Operations

General Requirements

As part of its overall Storm Water Management Program, the City of Canton is required to implement a “Pollution Prevention/Good Housekeeping Program” that has the ultimate goal of preventing or reducing pollutant runoff from municipal operations. See “Further Guidance and Information for MCM#5” below for details.

Decision Process for Development of “Pollution Prevention/Good Housekeeping Program”

The decision process for the development of a Pollution Prevention/Good Housekeeping Program consisted of the following steps, at a minimum:

| Steps to Develop and Implement a “Pollution Prevention/Good Housekeeping Program” | |
|--|--|
| Step # | Description |
| 1 | Understand permit requirements |
| 2 | Identify and document the City’s decision process for the development of a Pollution Prevention/ Good Housekeeping Program per permit requirements |
| 3 | Identify and implement program BMPs |
| 4 | Prepare and submit annual reports to Ohio EPA |
| 5 | Evaluate the success of the program annually and make adjustments accordingly |

Additional information pertaining to the decision process is provided below.

Operation and Maintenance Program to Reduce Pollutant Runoff from Municipal Operations

This program impacts daily municipal operations and activities that are most susceptible to storm water pollution. All “service” departments as well as other City departments have a role in storm water pollution prevention. The following table shows potential pollutants likely associated with certain municipal activities.

City of Canton Storm Water Management Program

| Potential Pollutants Likely Associated with Municipal Activities | | | | | | | | | | |
|---|---|-----------------------------|------------------|--------------|---------------|-----------------|-------------------------|-----------------|-------------------|------------------------------------|
| General Operations | Activities | Potential Pollutants | | | | | | | | |
| | | Sediment | Nutrients | Trash | Metals | Bacteria | Oil & Grease | Organics | Pesticides | Oxygen Demanding Substances |
| Municipal Facility Activities | Building & Grounds Maintenance and Repair | ✓ | ✓ | ✓ | ✓ | | ✓ | ✓ | ✓ | ✓ |
| | Parking/Storage Area Maintenance | | ✓ | | ✓ | | ✓ | ✓ | ✓ | ✓ |
| | Waste Handling & Disposal | ✓ | ✓ | ✓ | | | ✓ | ✓ | ✓ | ✓ |
| | Vehicle & Equipment Fueling | ✓ | | ✓ | ✓ | | ✓ | ✓ | | |
| | Vehicle & Equipment Maintenance & Repair | | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| | Vehicle & Equipment Washing & Steam Cleaning | ✓ | ✓ | ✓ | | ✓ | | | ✓ | ✓ |
| | Outdoor Loading & Unloading of Materials | ✓ | ✓ | ✓ | ✓ | | ✓ | ✓ | ✓ | ✓ |
| | Outdoor Container Storage of Liquids | | ✓ | | ✓ | | ✓ | ✓ | ✓ | ✓ |
| | Outdoor Storage of Raw Materials | ✓ | ✓ | ✓ | | | ✓ | ✓ | ✓ | ✓ |
| | Outdoor Process Equipment | ✓ | | ✓ | ✓ | | ✓ | ✓ | | |
| | Overwater Activities | | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| Landscape Maintenance | ✓ | ✓ | ✓ | | ✓ | | | ✓ | ✓ | |
| Streets & Highways Operation & Maintenance | Sweeping & Cleaning | ✓ | | ✓ | ✓ | | ✓ | | | ✓ |
| | Street Repair, Maintenance, & Striping/Painting | ✓ | | ✓ | ✓ | | ✓ | ✓ | | |
| | Bridge & Structure Maintenance | ✓ | | ✓ | ✓ | | ✓ | ✓ | | |
| Plaza, Sidewalk, and Parking Lot Maintenance & Cleaning | Surface Cleaning | ✓ | ✓ | | | ✓ | ✓ | | | ✓ |
| | Graffiti Cleaning | ✓ | ✓ | | ✓ | | | ✓ | | |
| | Sidewalk Repair | ✓ | | ✓ | | | | | | |
| | Controlling Litter | ✓ | | ✓ | | | ✓ | ✓ | | ✓ |
| Fountains, Pools, Lakes, & Lagoons Maintenance | Fountain & Pool Draining | | ✓ | | | | | ✓ | | |
| | Lake & Lagoon Maintenance | ✓ | ✓ | ✓ | | ✓ | | | ✓ | ✓ |
| Landscape Maintenance | Mowing/Trimming/Planting | ✓ | ✓ | ✓ | | ✓ | | | ✓ | ✓ |
| | Fertilizer & Pesticide Management | ✓ | ✓ | | | | | | ✓ | |
| | Managing Landscape Wastes | | | ✓ | | | | | ✓ | ✓ |
| | Erosion Control | ✓ | ✓ | | | | | | | |
| Drainage System Operation & Maintenance | Inspection & Cleaning of Stormwater Conveyance Structures | ✓ | ✓ | ✓ | | ✓ | | ✓ | | ✓ |
| | Roadside ditching | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| | Controlling Illicit Connections & Discharges | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| | Controlling Illegal Dumping | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| | Maintenance of Inlet & Outlet Structures | ✓ | | ✓ | ✓ | | ✓ | | | ✓ |
| Waste Handling & Disposal | Solid Waste Collection | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | | ✓ |
| | Waste Reduction & Recycling | | | ✓ | ✓ | | | | | ✓ |
| | Household Hazardous Waste Collection | | | ✓ | ✓ | | ✓ | ✓ | ✓ | |
| | Controlling Litter | | | ✓ | ✓ | ✓ | | ✓ | | ✓ |
| | Controlling Illegal Dumping | ✓ | | ✓ | | ✓ | ✓ | | ✓ | ✓ |
| Water & Sewer Utility Operation & Maintenance | Water Line Maintenance | ✓ | | | | | ✓ | ✓ | | |
| | Sanitary Sewer Maintenance | ✓ | | | | | ✓ | ✓ | | ✓ |
| | Spill/Leak/Overflow Control, Response, & Containment | ✓ | ✓ | | | | ✓ | | ✓ | ✓ |

The City of Canton is involved in most, if not all, of the above activities. Based on this and other aspects of the SWMP, the following key City departments have been determined to be impacted by the "Pollution Prevention/Good Housekeeping Program" for typical reasons shown below:

City of Canton Storm Water Management Program

| City Departments Involved in Operations Potentially Related to Storm Water Pollution | | |
|---|----------------------------------|--|
| | Department | Typical Operations Potentially Related to Storm Water Pollution |
| 1 | Building | Inspection of building construction |
| 2 | Building Maintenance | City building operations and maintenance |
| 3 | Civil Engineering | Storm water capital improvement projects; drainage complaints; etc. |
| 4 | Collection Systems (CSD) | Sewers operations and maintenance |
| 5 | Division of Motor Vehicles (DMV) | Fleet maintenance |
| 6 | Fire | Illicit discharge response, investigation |
| 7 | Health | Illicit discharge response, investigation |
| 8 | Parks & Recreation | Parks operations and maintenance |
| 9 | Police (Impound Lot) | Impound lot operations |
| 10 | Sanitation | City sanitation services |
| 11 | Street | City street operations and maintenance |
| 12 | Traffic: Parking | City-owned public-use parking lots/decks operations and maintenance |
| 13 | Traffic: Sign & Paint | City street signage and painting |
| 14 | Urban Forestry | City tree management |
| 15 | Water | City water utility operations and maintenance |
| 16 | Water Reclamation Facility (WRF) | City waste-water treatment plant operations and maintenance |

Industrial Facilities Subject to Ohio EPA's NPDES Industrial Storm Water General or Individual Permits

The City of Canton owns and operates the following "industrial facilities" that are subject to Ohio EPA's Industrial Storm Water General Permit or individual NPDES permits for discharges of storm water associated with industrial activity:

| City of Canton Facilities with NPDES Industrial/Individual Permits | | | |
|---|---|---------------------------|-----------------------------------|
| # | Facility Description | Permit Number | Discharge to a Canton MS4? |
| 1 | City of Canton Water Reclamation Facility | 3PE00000*QD (issued 2016) | Yes |
| 2 | City of Canton Water Department (NE) | 3IY00011*HD (issued 2017) | No ¹ |
| 3 | City of Canton Water Department (NW) | 3IY00010*HD (issued 2017) | No ¹ |
| 4 | City of Canton Water Department (Sugar Creek) | 3IY00012*HD (issued 2017) | No ¹ |

¹ Discharges to water of the state or other drainage system that is not a City MS4.

SWP3s for Municipal Facilities that Conduct "Industrial" Activities

Per the Ohio EPA "Guidance for MS4 Operated Industrial Facilities" flowchart, there are four City-owned facilities (highlighted in the table below) that are candidates for which a Storm Water Pollution Prevention Plan (SWP3) may need to be developed and implemented in accordance with the SWP3 requirements of Ohio EPA's Industrial Storm Water General Permit. However, after evaluating the flowchart and specific applicable conditions, it has been determined that only the Publicly-Owned Treatment Works (POTW)/Water Reclamation Facility is required to develop and implement an Industrial SWP3. The other three facilities can either certify "No Exposure" of respective activities and materials to storm water per Ohio EPA's "No Exposure Certification for Exclusion from NPDES Storm Water Permitting" checklist, or they do not perform specified operations and are therefore exempt. Each of the three exempt facilities will be reviewed annually to determine the current applicability of whether or not an Industrial SWP3 is required.

| SWP3s for Municipal Facilities that Conduct "Industrial" Activities | | | | | | |
|--|----|----------------------------------|---------------------------------------|------------------------------------|---|-------------------------------------|
| Does City of Canton operate any of the following? | | Does Facility Have: | | | Can Facility Certify "No Exposure" | Is Industrial SWP3 Required? |
| | | Vehicle Maintenance Shop? | Equipment Cleaning Operations? | Airport Deicing Operations? | | |
| Landfill | No | N/A | N/A | N/A | N/A | N/A |
| Steam Electric Power Generating Facility | No | N/A | N/A | N/A | N/A | N/A |

City of Canton Storm Water Management Program

| SWP3s for Municipal Facilities that Conduct "Industrial" Activities | | | | | | |
|--|------------|----------------------------------|---------------------------------------|------------------------------------|---|-------------------------------------|
| Does City of Canton operate any of the following? | | Does Facility Have: | | | Can Facility Certify "No Exposure" | Is Industrial SWP3 Required? |
| | | Vehicle Maintenance Shop? | Equipment Cleaning Operations? | Airport Deicing Operations? | | |
| POTW (≥1 mgd) | Yes | N/A | N/A | N/A | No | Yes¹ |
| Airport | No | N/A | N/A | N/A | N/A | N/A |
| Vehicle Maintenance Facility | Yes | DMV | Yes | Yes | No | No |
| | | Fire Station #1 | Yes | Yes | No | No |
| Bus Terminal | No | N/A | N/A | N/A | N/A | N/A |
| Impoundment Lot | Yes | No | No | No | N/A | No |
| Waste Transfer Station | No | N/A | N/A | N/A | N/A | N/A |
| Composting Facility | No | N/A | N/A | N/A | N/A | N/A |

¹ An Industrial SWP3 has been prepared in accordance with permit requirements.

Although Industrial SWP3s are not required for the two vehicle maintenance facilities and the impoundment lot, various pollution prevention/good housekeeping BMPs are still implemented, as applicable. See "Best Management Practices (BMPs)" below.

Government Employee Training Program

Municipal employee training is necessary to teach staff about potential sources of stormwater contamination and ways to minimize the water quality impact of municipal activities. Over the past several years, the City has purchased the following municipal storm water pollution prevention training kits:

1. "Storm Watch" – Municipal Storm Water Pollution Prevention Everyday Best Management Practices
2. "Rain Check" – Storm Water Pollution Prevention for MS4s
3. "IDDE a grate concern" – Illicit Discharge Detection & Elimination

These kits are all produced by Excal Visual and contain training DVDs, employee quizzes, pocket references, trainer's guides, and other training materials on various aspect of common municipal operations. Certain departments are expected to ensure appropriate employees are trained by using these training kits or by partaking in other relevant training opportunities throughout the year.

Since City employees are also considered part of the general public, this government employee training on storm water pollution prevention can also be considered part of the overall "Public Education and Outreach Program" (see MCM#1) as well as the education requirements for the "Storm Water Illicit Discharge Detection and Elimination Program" (see MCM#3). Departments that are expected to provide respective employee training are encouraged to also use resources that have been used to satisfy public education requirements in general.

Maintenance Activities, Schedules, and Long-Term Inspection Procedures to Reduce Pollution

In general, some of the BMPs implemented by the City of Canton to reduce floatables and other pollutants to and from the City's MS4 are scheduled, as applicable. Others are "reactive" and are performed in response to complaints or necessity. Many of the BMPs are typically "routine maintenance" by nature and are performed continually or on an as-needed basis. For example, street sweeping and lot/deck sweeping are often "scheduled" as part of routine maintenance instead of performed as a reaction to complaints. Long term inspection of permanent post-construction storm water quality BMPs has a "scheduled" aspect to it in that the Stark SWCD annually performs inspections of permanent post-construction storm water quality BMPs. So, depending on the nature of the respective BMP, there may or may not be a "scheduled" aspect to it. See "Best Management Practices (BMPs)" below for details.

City of Canton Storm Water Management Program

Controls for Reducing or Eliminating the Discharge of Pollutants from Streets and Municipal Operations

| Controls for Reducing or Eliminating the Discharge of Pollutants from Streets and Municipal Operations | |
|---|---|
| Pollutants from | Controls Used¹ |
| Streets, roads, and highways | <ul style="list-style-type: none"> • Street sweeping; • Storm sewer, catch basin, and manhole cleaning - CSD performs catch basin, manhole, and storm line cleaning throughout the year. Priority is typically given to certain storm sewer systems (such as those serving main streets and highways) while others are cleaned based on responses to complaints. • Roadside Ditching |
| Municipal parking lots | <ul style="list-style-type: none"> • Lot/deck sweeping - City-owned parking lots can be classified into 2 categories: those used for public parking (2 decks, 3 lots) and those used for City employee parking (various locations throughout City). Public-use parking lots are swept by the Traffic: Parking Division of the City Engineering Department, while City employee parking lots are swept by the Street Department. Scheduled sweepings are typically performed on public-use lots, while visual inspections are used to determine the need for lot sweeping on City employee lots. The Traffic: Parking and Street Departments both have street sweepers that are used as necessary, for public-use and City employee lots, respectively. Traffic: Parking also uses hand brooms and dust pans as needed on public-use lots. |
| Maintenance and storage yards | <ul style="list-style-type: none"> • Berms areas around some outdoor material supplies; • Drums labeled and closed with lids; • Dumpsters with closed lids; • Catch basins with special water quality inserts installed near fuel islands - Nyloplast Catch Basins with Storm Pure Infiltration System inserts have been installed downstream from vehicle fuel pumps at the City Service Center and at WRF. These systems consist of features that capture sediment, debris, and tiny particles of hydrocarbons and oil-bound pollutants and therefore prevent or reduce such pollutants from discharging into the MS4 and ultimately into surface waters. • Hay bales near sanitation trucks parking area to filter possible polluted runoff from trucks; • Some materials on pallets to keep from contact with runoff; |
| Waste transfer stations | [City of Canton does not operated any waste transfer stations] |
| Fleet or maintenance shops with outdoor storage areas | <ul style="list-style-type: none"> • No maintenance materials stored outside - The City of Canton owns/operates two fleet maintenance shops (garages). These garages are located at the Division of Motor Vehicles (at City Service Center: 2436 30th St NE, Canton, OH 44705) and at Fire Station #1 (at 110 7th St SW, Canton, OH 44702). However, neither of these maintenance garages store any materials outdoors. All fleet maintenance materials are stored indoors. • Drip pans/cloths placed under outdoor vehicles awaiting service, as needed |
| Salt/sand storage locations | <ul style="list-style-type: none"> • Road salt is stored in domes - The City of Canton has 6 salt domes on City-owned property: 3 at the City Service Center (1 not in use); 2 at Cleveland Ave SW location (1 used by ODOT); 1 at Schroyer Ave SW. • Bagged salt, when used, is stored on pallets; • Salt spills swept up as needed |
| Snow disposal areas | <ul style="list-style-type: none"> • Snow is plowed to edges of streets; • Parking bans are issued as needed to facilitate plowing; • If needed, excess snow may be transported to maintenance outpost where, after snowmelt, remaining debris is swept up as needed |

¹ Not an exhaustive list. Also see "Best Management Practices (BMPs)" below.

The following is a description of materials used for roadway winterization per the City Street Department:

| Roadway Winterization | | |
|------------------------------|---|--|
| Materials Used | Application Rate | Rationale for Application Rates |
| Standard road salt | 300 lbs/lane-mile | ODOT-recommended rates |
| Salt brine | Anti-icing: 20-30 gal/lane-mile; Pre-wet: 8-10 gal/ton of salt | |

Procedures for Proper Disposal of Waste Removed from the MS4 and Related Municipal Operations

The City of Canton abides by the following for the management of waste removed from streets, ditches, and storm sewers:

| Management of Waste Removed from Streets, Ditches, and Storm Sewers | | | | | | |
|---|--|----------------------------|---|---------------------------|---|---|
| Municipal Activity | Considered to be "Solid Waste" by EPA? | Allowed to be Open-Dumped? | Must be Taken to Licensed Solid Waste Landfill? | Must be De-Watered First? | Comments | Considered to be "Hazardous Waste"? |
| <ul style="list-style-type: none"> Street sweeping debris Storm sewer cleaning debris (including CBs and MHs) | Yes | No | Yes | Yes | Can be de-watered on outdoor pad that drains to sanitary sewer OR can be de-watered indoors with floor drains connected to sanitary sewer. Debris CAN be re-used for certain applications but must be de-watered, etc. first | Only if it contains hazardous spill components. If so, it must be handled as hazardous waste. |
| <ul style="list-style-type: none"> "Clean" roadside ditching debris Berm maintenance debris | No | Yes | No | No | "Clean" is considered sediment/dirt only and NOT containing any street or storm sewer debris or trash. If it is NOT "clean", it is considered "solid waste" which must be separated from the "clean" ditching debris and handled as "solid waste" OR if NOT separated the entire debris needs to be handled as "solid waste". | Only if it contains hazardous spill components. If so, it must be handled as hazardous waste. |

Procedures to Ensure Flood Management Projects are Assessed for Impact on Water Quality

Any public "flood management projects" that occur in the City of Canton are coordinated through the City Engineering Department. In cooperation with NPDES storm water permitting requirements, qualifying land disturbances (including flood management projects) of one acre or more in the City are assessed for proper water quality practices (See MCM #4 and MCM #5). The Engineering Department has staff that are trained in storm water quantity and quality management. Water quality practices are therefore ensured to be incorporated into all applicable new and redevelopment projects. The incorporation of water quality protection devices or practices on current sites/projects are to be evaluated on a case-by-case basis.

Responsible Parties for Implementing the Pollution Prevention/Good Housekeeping Program

The City of Canton Service Director is responsible for the overall compliance of the City with the NPDES Storm Water Permit requirements. Coordination of the SWMP is delegated to the Assistant City Engineer of the Civil Engineering Department. Responsibility for implementation of *certain* BMPs has been assigned to *specific* departments. *Other* BMPs may be implemented by *any* department *as feasible*. See Best Management Practices (BMPs) below and the Table of Organization for details. As BMPs are implemented, each respective responsible position is required to maintain appropriate supporting documentation.

Best Management Practices (BMPs)

Aside from Minimum Control Measure #6 BMPs that may be described above, the table below also lists certain BMPs that are expected or required to be implemented by certain departments, while others are shown as recommendations for potential implementation depending on applicability and/or feasibility. Recommendations are based on USEPA, NEOSWTC, and permit recommendations:

City of Canton Storm Water Management Program

- USEPA has prepared “BMP Fact Sheets” and other resources related to many BMPs in the City’s Storm Water Management Program. They can be found on the *National Menu of Best Management Practices (BMPs) for Stormwater* webpage by clicking on the respective Minimum Control Measure tabs. The BMP Fact Sheets provide further explanation, applicability, recommendations, implementation, and effectiveness information of common BMPs. Fact sheets and resources should be reviewed periodically by employees who are involved in respective BMP implementation. See “Further Guidance and Information for MCM#6” below.
- The Northeast Ohio Storm Water Training Council (NEOSWTC) has prepared “TMDL Fact Sheets” pertaining to respective Nimishillen Creek TMDLs and corresponding recommended BMPs to address the TMDLs. In order to meet permit requirements, appropriate BMPs must be selected to address TMDL recommendations. Therefore, some of the recommended BMPs are to be utilized as part of the City’s Pollution Prevention/Good Housekeeping Program. According to the NEOSWTC, the implementation of pollution prevention and good housekeeping practices at community facilities and operations addresses habitat, nutrients, and bacteria TMDLs. Therefore, essentially all BMPs implemented for MCM#6 may possibly address respective TMDLs.

Depending on whether or not a BMP is a requirement or recommendation, measurable goals have been written accordingly. Annual Reports will document exactly which BMPs were implemented in the previous year as well as identify possible BMPs to be implemented in the upcoming year.

**Minimum Control Measure #6
Pollution Prevention/Good Housekeeping for Municipal Operations
Best Management Practices (BMPs)**

See footnotes at end of table

| # | BMP | | Justification | Responsible Party | Legal Authority? | Measurable Goals | | Address TMDLs? |
|----|---|-------------------------------------|--|-------------------|---|------------------------------------|---------------|----------------|
| | Name | Justification | | | | (Schedules, Frequency, Etc.) | Justification | |
| 1 | "Municipal Employee Training and Education" ^{7,2} | | | | | | | |
| 1a | <p>Employee Training Program² to reduce storm water pollution from activities such as:</p> <ul style="list-style-type: none"> • Park and open space maintenance • Fleet and building maintenance • New construction and land disturbances • Storm water system maintenance | Required by permit | <p>Building; Building Maintenance; Civil Engineering; CSD; DMV; Fire; Parks & Recreation; Police (Impound Lot); Sanitation; Street; Traffic: Parking; Traffic: Sign & Paint; Urban Forestry; Water; WRF</p> | Yes | <ul style="list-style-type: none"> • Conduct annual training of appropriate employees; • Annual Reporting requirements⁷ | Required | Yes | |
| 1b | <p>Complete an annual training for applicable employees on any combination of the topics listed below:</p> <ul style="list-style-type: none"> • Streets, roads, and highways • Municipal parking lots • Maintenance and storage yards, including, but not limited to municipal composting facilities and leaf collection yards • Golf courses, parks, and related maintenance facilities • Waste transfer stations, compost facilities, solid waste facilities (e.g. municipal solid waste (MSW) landfills, and construction and demolition (C&D) landfills) • Marinas | Recommended by NEOSWTC ¹ | <p>Building; Building Maintenance; Civil Engineering; CSD; DMV; Fire; Parks & Recreation; Police (Impound Lot); Sanitation; Street; Traffic: Parking; Traffic: Sign & Paint; Urban Forestry; Water; WRF</p> | Yes | Implement recommendation | Continuous/ongoing/as-needed basis | Yes | |

**Minimum Control Measure #6
Pollution Prevention/Good Housekeeping for Municipal Operations
Best Management Practices (BMPs)**

See footnotes at end of table

| # | BMP | | Responsible Party | Legal Authority? | Measurable Goals | | Address TMDLs? |
|--|--|-----------------------------------|------------------------------------|------------------|--|------------------------------------|-----------------------|
| | Name | Justification | | | (Schedules, Frequency, Etc.) | Justification | |
| 2 | <ul style="list-style-type: none"> • Fleet and/or maintenance shops • Salt/sand storage locations • Snow disposal areas | | | | | | |
| Pollution Prevention from "Coal-Tar Sealcoats and Polycyclic Aromatic Hydrocarbons" ² | | | | | | | |
| 2a | Do not use coal-tar pavement sealants | Recommended by USEPA ² | [All other applicable departments] | Yes | Implement recommendation ⁵ | Pending | Possibly ⁶ |
| 2b | Use pervious concrete, permeable asphalt, or permeable pavers | Recommended by USEPA ² | [All applicable departments] | Yes | Implement recommendation ⁵ | Pending | Possibly ⁶ |
| 3 | "Municipal Landscaping" ² | | | | | | |
| 3a | Select native species and locate plants in areas where conditions are optimal for growth requirements | Recommended by USEPA ² | [All applicable departments] | Yes | Implement recommendation ⁵ | Pending | Possibly ⁶ |
| 3b | Perform soil analysis to prevent over-application of fertilizer | Recommended by USEPA ² | [All applicable departments] | Yes | Implement recommendation ⁵ | Pending | Possibly ⁶ |
| 3c | Carefully select turf to minimize watering and fertilizer requirements by choosing grasses that thrive in local climate | Recommended by USEPA ² | [All applicable departments] | Yes | Implement recommendation ⁵ | Pending | Possibly ⁶ |
| 3d | Minimize turf area by replacing it with ground cover, shrubs, and trees, thus reducing mowing requirements | Recommended by USEPA ² | [All applicable departments] | Yes | Implement recommendation ⁵ | Pending | Possibly ⁶ |
| 3e | Implement efficient watering practices | Recommended by USEPA ² | [All applicable departments] | Yes | Continue to implement recommendation | Pending | Possibly ⁶ |
| 3f | Use mulches to stabilize exposed soils, prevent growth of nuisance vegetation, and improve soil fertility | Recommended by USEPA ² | [All applicable departments] | Yes | Implement recommendation ⁵ | Pending | Possibly ⁶ |
| 3g | Practice reduced/judicious application of pesticides, herbicides, and/or fertilizers according to manufacturer recommendations | Recommended by USEPA ² | [All applicable departments] | Yes | <ul style="list-style-type: none"> • Continue to implement recommendation; • Annual Reporting requirements⁷ | Continuous/ongoing/as-needed basis | Yes |

**Minimum Control Measure #6
Pollution Prevention/Good Housekeeping for Municipal Operations
Best Management Practices (BMPs)**

See footnotes at end of table

| # | BMP | | Justification | Responsible Party | Legal Authority? | Measurable Goals | | Address TMDLs? |
|----|--|-------------------------------------|------------------------------|-------------------|--|------------------------------------|-----------------------|----------------|
| | Name | Justification | | | | (Schedules, Frequency, Etc.) | Justification | |
| 3h | Implement BMPs for fertilizer storage and application | Recommended by NEOSWTC ¹ | [All applicable departments] | Yes | Continuous to implement recommendation | Continuous/ongoing/as-needed basis | Yes | |
| 3i | Use composted organic material for fertilizer | Recommended by USEPA ² | [All applicable departments] | Yes | Implement recommendation ⁵ | Pending | Possibly ⁶ | |
| 3j | Do not bag grass clippings or only bagged as needed | Recommended by USEPA ² | [All applicable departments] | Yes | Continuous to implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ | |
| 3k | Do not mow along banks of creeks, lakes, etc. | Recommended by USEPA ² | [All applicable departments] | Yes | Implement recommendation ⁵ | Pending | Yes | |
| 3l | Implement low-mow or no-mow practices that preserve buffer areas around streams, wetlands, and storm water basins | Recommended by NEOSWTC ¹ | [All applicable departments] | Yes | Implement recommendation ⁵ | Pending | Yes | |
| 3m | Develop written department procedures for proper municipal landscaping | Recommended by USEPA ² | [All applicable departments] | Yes | Implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ | |
| 3n | Reduce turf grass on municipal parks and open spaces | Recommended by NEOSWTC ¹ | [All applicable departments] | Yes | Implement recommendation ⁵ | Pending | Yes | |
| 3o | At community-owned and operated facilities (maintenance garages, golf courses, parks, community gardens, cemeteries, etc.) maintain, protect, and restore permanent natural vegetative buffers between developed areas and water resources | Recommended by NEOSWTC ¹ | [All applicable departments] | Yes | Implement recommendation ⁵ | Pending | Yes | |
| 3p | Incorporate leachate management for maintenance and storage yards, including municipal composting facilities and leaf collection yards | Recommended by NEOSWTC ¹ | [All applicable departments] | Yes | Implement recommendation ⁵ | Pending | Yes | |
| 4 | "Municipal Vehicle Fueling"² | | | | | | | |
| 4a | Pave and slope fuel dispensing area to prevent ponding | Recommended by USEPA ² | DMV | Yes | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ | |
| | | | WRF | Yes | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ | |

**Minimum Control Measure #6
Pollution Prevention/Good Housekeeping for Municipal Operations
Best Management Practices (BMPs)**

See footnotes at end of table

| # | BMP | | Responsible Party | Legal Authority? | Measurable Goals | | Address TMDLs? |
|----|--|-----------------------------------|-------------------|------------------|---------------------------------------|------------------------------------|-----------------------|
| | Name | Justification | | | (Schedules, Frequency, Etc.) | Justification | |
| 4b | Separate fuel dispensing area from the rest of the site by a grade break or berm that prevents run-on of storm water | Recommended by USEPA ² | DMV | Yes | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ |
| 4c | Provide a holding tank at fuel dispensing area to capture any fuel spills; properly drain holding tank as needed | Recommended by USEPA ² | WRF | Yes | Implement recommendation ⁵ | Pending | Possibly ⁶ |
| 4d | Cover entire fuel dispensing area by roof or canopy | Recommended by USEPA ² | DMV | Yes | Implement recommendation ⁵ | Pending | Possibly ⁶ |
| 4e | Do not allow roof/canopy over fuel dispensing area to drain onto the fuel dispensing area | Recommended by USEPA ² | WRF | Yes | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ |
| 4f | Use a perimeter drain or slope the pavement inward so that the runoff drains to a blind sump | Recommended by USEPA ² | DMV | Yes | Implement recommendation ⁵ | Pending | Possibly ⁶ |
| 4g | Install and maintain oil control devices in catch basins (i.e. inserts specifically designed to catch hydrocarbons) that might receive runoff from the fueling area | Recommended by USEPA ² | WRF | Yes | Implement recommendation ⁵ | Pending | Possibly ⁶ |
| 4h | For facilities where equipment is being fueled with a mobile truck, establish a designated fueling area. Place temporary "caps" over nearby catch basins and manhole covers. | Recommended by USEPA ² | DMV | Yes | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ |
| 4i | Use secondary containment when transferring fuel from tank truck to fuel tank. Also temporarily cover nearby storm drains. | Recommended by USEPA ² | WRF | Yes | Implement recommendation ⁴ | Pending | Possibly ⁶ |

**Minimum Control Measure #6
Pollution Prevention/Good Housekeeping for Municipal Operations
Best Management Practices (BMPs)**

See footnotes at end of table

| # | BMP | | Responsible Party | Legal Authority? | Measurable Goals | | Address TMDLs? |
|----|--|-----------------------------------|-------------------|------------------|---------------------------------------|------------------------------------|-----------------------|
| | Name | Justification | | | (Schedules, Frequency, Etc.) | Justification | |
| 4j | Install vapor recovery nozzles to help control drips as well as reduce air pollution | Recommended by USEPA ² | DMV | Yes | Implement recommendation ⁵ | Pending | Possibly ⁶ |
| 4k | Provide a written fuel spill prevention and cleanup plan and clearly post it at the fuel pumps | Recommended by USEPA ² | DMV | Yes | Implement recommendation | Pending | Possibly ⁶ |
| 4l | Provide readily-accessible dry spill cleanup materials and/or spill kits at the fuel pumps. Sweep to remove litter and debris and use rags and adsorbents for leaks and spills. Do not use water to wash the areas. | Recommended by USEPA ² | DMV | Yes | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ |
| 4m | Regularly inspect fuel pumps by qualified personnel: <ul style="list-style-type: none"> ● Check for external corrosion and structural failure in above-ground tanks ● Check for spills and overfills due to operator error ● Check for failure of any piping systems ● Check for leaks or spills during pumping of liquids or gases from a truck or rail car to a storage facility or vice-versa ● Visually inspect new tank or container installations for loose fittings, poor welds, and improper or poorly-fitted gaskets ● Inspect tank foundations, connections, coatings, tank walls, and piping systems. Look for | Recommended by USEPA ² | DMV | Yes | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ |
| | | | WRF | Yes | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ |

**Minimum Control Measure #6
Pollution Prevention/Good Housekeeping for Municipal Operations
Best Management Practices (BMPs)**

See footnotes at end of table

| # | BMP | | Responsible Party | Legal Authority? | Measurable Goals | | Address TMDLs? |
|----|---|-----------------------------------|------------------------------|------------------|--|--|--|
| | Name | Justification | | | (Schedules, Frequency, Etc.) | Justification | |
| | corrosion, leaks, cracks, scratches, and other physical damage that may weaken the tank or container system. • Above-ground tanks should be tested periodically for integrity by a qualified professional | | | | | | |
| 4n | During routine cleaning , use a damp cloth on the pumps and a damp mop on the pavement rather than spraying with a hose | Recommended by USEPA ² | DMV WRF | Yes Yes | Implement recommendation Implement recommendation | Continuous/ongoing/as-needed basis Continuous/ongoing/as-needed basis | Possibly ⁶ Possibly ⁶ |
| 4o | Fuel-dispensing nozzles should be fitted with "hold-open latches" except where prohibited by local fire departments | Recommended by USEPA ² | DMV WRF | Yes Yes | Implement recommendation ⁵ Implement recommendation ⁵ | Pending Pending | Possibly ⁶ Possibly ⁶ |
| 4p | Post signs at fuel dispensers or island warning against "topping-off" vehicle fuel tanks | Recommended by USEPA ² | DMV WRF | Yes Yes | Implement recommendation Implement recommendation | Pending Pending | Possibly ⁶ Possibly ⁶ |
| 4q | Provide written procedures to employees who will be using fueling systems that describe fueling BMPs | Recommended by USEPA ² | DMV WRF | Yes Yes | Implement recommendation Implement recommendation | Pending Pending | Possibly ⁶ Possibly ⁶ |
| 4r | Adequately and regularly train appropriate employees with respect to fueling operations and spill prevention and cleanup. | Recommended by USEPA ² | DMV WRF | Yes Yes | Continue to implement recommendation Continue to implement recommendation | Continuous/ongoing/as-needed basis Continuous/ongoing/as-needed basis | Possibly ⁶ Possibly ⁶ |
| 5 | "Municipal Vehicle and Equipment Maintenance" ² | | | | | | |
| 5a | Perform all vehicle and equipment maintenance activities indoors | Recommended by USEPA ² | [All applicable departments] | Yes | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ |
| 5b | Clean up spills immediately, without water whenever possible; dispose of cleanup materials properly | Recommended by USEPA ² | [All applicable departments] | Yes | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ |

**Minimum Control Measure #6
Pollution Prevention/Good Housekeeping for Municipal Operations
Best Management Practices (BMPs)**

See footnotes at end of table

| # | BMP | | Responsible Party | Legal Authority? | Measurable Goals | | Address TMDLs? |
|----|---|-----------------------------------|------------------------------|------------------|---------------------------------------|------------------------------------|-----------------------|
| | Name | Justification | | | (Schedules, Frequency, Etc.) | Justification | |
| 5c | Seal floor drains that are known to discharge to storm sewers | Recommended by USEPA ² | [All applicable departments] | Yes | Implement recommendation | Pending | Possibly ⁶ |
| 5d | Use a solvent service to supply parts and cleaning materials and to collect spent solvent | Recommended by USEPA ² | [All applicable departments] | Yes | Implement recommendation ⁵ | Pending | Possibly ⁶ |
| 5e | For floor drains that discharge to sanitary sewer, verify with WRF if treatment is required prior to release from the site (i.e. oil/grease separators) | Recommended by USEPA ² | [All applicable departments] | Yes | Implement recommendation | Pending | Possibly ⁶ |
| 5f | Keep the number of solvents used to a minimum | Recommended by USEPA ² | [All applicable departments] | Yes | Implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ |
| 5g | Do all liquid cleaning at a centralized station to ensure that solvents and residues stay in one area | Recommended by USEPA ² | [All applicable departments] | Yes | Implement recommendation ⁵ | Pending | Possibly ⁶ |
| 5h | Locate drip pans and draining boards to direct solvents back into a solvent sink or holding tank for reuse | Recommended by USEPA ² | [All applicable departments] | Yes | Implement recommendation ⁵ | Pending | Possibly ⁶ |
| 5i | Use non-hazardous cleaners when possible | Recommended by USEPA ² | [All applicable departments] | Yes | Implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ |
| 5j | Replace chlorinated organic solvents with non-chlorinated ones like kerosene or mineral spirits | Recommended by USEPA ² | [All applicable departments] | Yes | Implement recommendation ⁵ | Pending | Possibly ⁶ |
| 5k | Purchase recycled products, such as engines, oil, transmission fluid, antifreeze, and hydraulic fluid | Recommended by USEPA ² | [All applicable departments] | Yes | Implement recommendation ⁵ | Pending | Possibly ⁶ |
| 5l | Install berms or other measures to contain spills and prevent work surface runoff from entering storm drains | Recommended by USEPA ² | [All applicable departments] | Yes | Implement recommendation ⁵ | Pending | Possibly ⁶ |
| 5m | Use as little water as possible to clean spills, leaks, and drips | Recommended by USEPA ² | [All applicable departments] | Yes | Implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ |

**Minimum Control Measure #6
Pollution Prevention/Good Housekeeping for Municipal Operations
Best Management Practices (BMPs)**

See footnotes at end of table

| # | BMP | | Responsible Party | Legal Authority? | Measurable Goals | | Address TMDLs? |
|----|---|-----------------------------------|------------------------------|------------------|--|------------------------------------|-----------------------|
| | Name | Justification | | | (Schedules, Frequency, Etc.) | Justification | |
| 5n | Follow a spill prevention plan | Recommended by USEPA ² | [All applicable departments] | Yes | Implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ |
| 5o | Reinforce employee training and public outreach to reinforce proper disposal practices | Recommended by USEPA ² | [All applicable departments] | Yes | Implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ |
| 5p | Update facility schematics to accurately reflect all plumbing connections | Recommended by USEPA ² | [All applicable departments] | Yes | Implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ |
| 5q | Closely monitor parked vehicles for leaks and place pans under any leaks to collect the fluids for proper disposal or recycling | Recommended by USEPA ² | [All applicable departments] | Yes | Implement recommendation ⁵ | Pending | Possibly ⁶ |
| 5r | Promptly transfer used fluids to recycling drums or hazardous waste containers | Recommended by USEPA ² | [All applicable departments] | Yes | Implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ |
| 5s | Dispose of liquid waste properly | Recommended by USEPA ² | [All applicable departments] | Yes | Implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ |
| 5t | In the event of a spill, cover drains with drain mats | Recommended by USEPA ² | [All applicable departments] | Yes | Implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ |
| 5u | Store cracked batteries in leak-proof secondary containers | Recommended by USEPA ² | [All applicable departments] | Yes | Implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ |
| 5v | Use detergent-based or water-based cleaning systems instead of organic solvent degreasers | Recommended by USEPA ² | [All applicable departments] | Yes | Implement recommendation ⁵ | Pending | Possibly ⁶ |
| 5w | Steam-clean or pressure-wash parts instead of using solvents | Recommended by USEPA ² | [All applicable departments] | Yes | Implement recommendation ⁵ | Pending | Possibly ⁶ |
| 5x | Periodically inspect and maintain oil/water separators | Recommended by USEPA ² | [All applicable departments] | Yes | Implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ |
| 5y | Certify "No Exposure" to storm water runoff for all vehicle maintenance garage activities. | As applicable | DMV; Fire (Station #1) | Yes | Review qualifications for "No Exposure" annually and update status accordingly | Continuous/ongoing/as-needed basis | Possibly ⁶ |
| 6 | "Municipal Vehicle and Equipment Washing" | | | | | | |
| 6a | Install indoor wash racks that discharge wash water to the sanitary | Recommended by USEPA ² | [All applicable departments] | Yes | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ |

Minimum Control Measure #6
 Pollution Prevention/Good Housekeeping for Municipal Operations
 Best Management Practices (BMPs)

See footnotes at end of table

| # | BMP | | Responsible Party | Legal Authority? | Measurable Goals | | Address TMDLs? |
|----|---|-----------------------------------|------------------------------|------------------|---------------------------------------|------------------------------------|-----------------------|
| | Name | Justification | | | (Schedules, Frequency, Etc.) | Justification | |
| | sewer - The City Service Center has 4 indoor vehicle washing bays (at DMV, Street, Parks & Rec, and CSD. WRF and Water Department also have indoor vehicle washing bays. All of these indoor bays have floor drains that connect to sanitary sewers. | | | | | | |
| 6b | Use commercial car washes and/or steam cleaning businesses accordingly - The City annually contracts with local commercial car washes for washing of other City vehicles used by various departments, as necessary. All commercial car washes are required to have wash water treated via sanitary sewer. | Recommended by USEPA ² | [All applicable departments] | Yes | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ |
| 6c | Train employees and subcontractors in proper washing procedures to avoid illicit discharges | Recommended by USEPA ² | [All applicable departments] | Yes | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ |
| 6d | Pave and berm or slope designated wash areas to contain and direct wash water to a sump connected to the sanitary sewer or a holding tank, process system, or enclosed recycling system | Recommended by USEPA ² | [All applicable departments] | Yes | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ |
| 6e | Seek the permission of WRF before discharging wash water to the sanitary sewer, and abide by any special treatment requirements | Recommended by USEPA ² | [All applicable departments] | Yes | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ |
| 6f | Design wash racks to recycle wash water | Recommended by USEPA ² | [All applicable departments] | Yes | Implement recommendation ⁵ | Pending | Possibly ⁶ |

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See footnotes at end of table

| # | BMP | | Responsible Party | Legal Authority? | Measurable Goals | | Address TMDLs? |
|----|--|-----------------------------------|------------------------------|------------------|---------------------------------------|---------------|-----------------------|
| | Name | Justification | | | (Schedules, Frequency, Etc.) | Justification | |
| 6g | Avoid detergents whenever possible. If detergents are necessary, a phosphate-free, non-toxic, biodegradable soap is recommended. Detergents should be avoided if an oil/water separator is used for pretreatment prior to discharge to the sanitary sewer. | Recommended by USEPA ² | [All applicable departments] | Yes | Implement recommendation ⁵ | Pending | Possibly ⁶ |
| 6h | Municipal facilities that store vehicles should stencil their storm drains (or post signage) to remind employees to wash vehicles within the designated wash area. | Recommended by USEPA ² | [All applicable departments] | Yes | Implement recommendation ⁵ | Pending | Possibly ⁶ |
| 6i | Mount spill kits with absorbent containment materials and instructions near wash racks. Immediately contain and treat all spills. | Recommended by USEPA ² | [All applicable departments] | Yes | Implement recommendation | Pending | Possibly ⁶ |
| 6j | If vehicle washing outside must be performed, take precautions to avoid wash water discharges to the storm drainage system: <ul style="list-style-type: none"> • For small jobs, berm the area surrounding the vehicle and use a wet/dry vacuum to capture the wash water for discharge to the sanitary sewer • For large jobs, use a combination of berms and a vacuum truck • If detergents are used, clean the pavement to prevent the detergents from being carried to the storm drain. | Recommended by USEPA ² | [All applicable departments] | Yes | Implement recommendation | Pending | Possibly ⁶ |
| 6k | Periodically inspect, clean, and maintain wash rack paved surfaces, | | | | Implement recommendation | Pending | |

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| | Name | Justification | | | (Schedules, Frequency, Etc.) | Justification | |
| | sumps, plumbing, recycling, and pretreatment systems | | | | | | |
| 7 | "Parking Lot and Street Cleaning" ^{7,2} | | | | | | |
| 7a | Street sweeping | Recommended by USEPA ² ; NEOSWTC ¹ | Street | Yes | <ul style="list-style-type: none"> Sweep all streets except alleys at least 3 times per year; Annual Reporting requirements⁷ | Practical | Yes |
| 7b | Parking lot/deck sweeping | Recommended by USEPA ² ; NEOSWTC ¹ | Traffic: Parking | Yes | <ul style="list-style-type: none"> Sweep City-owned public parking decks at least 5 times per year; Annual Reporting requirements⁷ | Practical | Yes |
| 7c | Design and maintain a sweeping schedule | Recommended by USEPA ² | Street | Yes | Sweep all streets except alleys at least 3 times per year | Practical | Possibly ⁶ |
| 7d | Conduct sweeping as soon as possible after snow melts | Recommended by USEPA ² | Traffic: Parking | Yes | Sweep City-owned public parking decks at least 5 times per year | Practical | Possibly ⁶ |
| 7e | Maintain accurate records of the number of lane-miles (or lot areas) swept and the amount of waste collected | Recommended by USEPA ² | Street; Traffic: Parking | Yes | Implement recommendation ⁵ | Pending | Possibly ⁶ |
| 7f | Ensure debris collected from sweepings is de-watered to sanitary sewer then disposed at solid waste landfill | Recommended by USEPA ² | Street; Traffic: Parking | Yes | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ |
| 7g | If debris collected from sweepings needs to be temporarily stored, ensure it is covered and secondary containment is provided | Recommended by USEPA ² | Street; Traffic: Parking | Yes | <ul style="list-style-type: none"> Implement recommendation; Annual Reporting requirements⁷ | Continuous/ongoing/as-needed basis | Possibly ⁶ |

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|----|--|-----------------------------------|---|-------------------|---|------------------------------------|-----------------------|----------------|
| | Name | Justification | | | | (Schedules, Frequency, Etc.) | Justification | |
| 7h | Only reuse debris collected from sweepings as approved by Ohio EPA | Recommended by USEPA ² | Street; Traffic: Parking | Yes | Implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ | |
| 7i | Establish and enforce parking policies to increase the effectiveness of sweeping program | Recommended by USEPA ² | Street; Traffic: Parking | Yes | Implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ | |
| 7j | Regularly inspect and maintain sweeping equipment | Recommended by USEPA ² | Street; Traffic: Parking | Yes | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ | |
| 7k | Inventory and stock sweeping equipment parts to prevent downtime and decrease productivity | Recommended by USEPA ² | Street; Traffic: Parking | Yes | Implement recommendation ⁵ | Pending | Possibly ⁶ | |
| 7l | Replace old sweepers with new sweepers that maximize pollutant removal | Recommended by USEPA ² | Street; Traffic: Parking | Yes | Implement recommendation ^{4,5} | Pending | Possibly ⁶ | |
| 8 | "Road Salt Application and Storage" ² | | | | | | | |
| 8a | Maintain accurate records of the amount of salt used | Required by Ohio EPA | Street; [All other applicable departments] | Yes | Continue to implement recommendation; • Annual Reporting requirements ⁷ | Required | Possibly ⁶ | |
| 8b | Cover stored salt | Recommended by USEPA ² | Street; [All other applicable departments] | Yes | Continue to implement recommendation; • Annual Reporting requirements ⁷ | Continuous/ongoing/as-needed basis | Possibly ⁶ | |
| 8c | Locate salt storage piles outside of 100-year floodplain | Recommended by USEPA ² | Street; [All other applicable departments] | Yes | Continue to implement recommendation; • Annual Reporting requirements ⁷ | Continuous/ongoing/as-needed basis | Possibly ⁶ | |
| 8d | Regulate application of salt to reflect specific site characteristics such as road/lot width, traffic concentration, and proximity to surface waters | Recommended by USEPA ² | Street; [All other applicable departments] | Yes | Continue to implement recommendation; • Annual Reporting requirements ⁷ | Continuous/ongoing/as-needed basis | Possibly ⁶ | |
| 8e | Use calibration devices mounted in cabs of spreader-trucks to ensure | Recommended by USEPA ² | Street; | Yes | Continue to implement recommendation ^{4,5} ; | Continuous/ongoing/as-needed basis | Possibly ⁶ | |

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|----|---|-----------------------------------|---|------------------|--|------------------------------------|-----------------------|--|
| | Name | Justification | | | (Schedules, Frequency, Etc.) | Justification | | |
| | proper application rates; routinely calibrate | | [All other applicable departments] | | <ul style="list-style-type: none"> Annual Reporting requirements⁷ | | | |
| 8f | Use alternative deicing or traction materials in especially sensitive areas | Recommended by USEPA ² | Street; [All other applicable departments] | Yes | <ul style="list-style-type: none"> Implement recommendation⁵; Annual Reporting requirements⁷ | Pending | Possibly ⁶ | |
| 8g | Train appropriate employees in proper de-icing techniques, the timing of deicer applications, and the type of deicer to apply | Recommended by USEPA ² | Street; [All other applicable departments] | Yes | <ul style="list-style-type: none"> Continue to implement recommendation; Annual Reporting requirements⁷ | Continuous/ongoing/as-needed basis | Possibly ⁶ | |
| 8h | Use alternative deicers like glycol, urea, or calcium magnesium acetate (CMA) to reduce the corrosion of metal bridge supports | Recommended by USEPA ² | Street; [All other applicable departments] | Yes | <ul style="list-style-type: none"> Implement recommendation⁵; Annual Reporting requirements⁷ | Pending | Possibly ⁶ | |
| 9 | "Roadway and Bridge Maintenance" ² | | | | | | | |
| 9a | Perform paving operations only in dry weather, using concrete, asphalt, or other sealers | Recommended by USEPA ² | Street; [All other applicable departments] | Yes | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ | |
| 9b | Use proper staging techniques to reduce spillage of paving materials during the repair of potholes and worn pavement | Recommended by USEPA ² | Street; [All other applicable departments] | Yes | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ | |
| 9c | Cover storm drains and manholes during paving operations | Recommended by USEPA ² | Street; [All other applicable departments] | Yes | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ | |
| 9d | Use erosion and sediment controls to decrease runoff from repair sites | Recommended by USEPA ² | Street; [All other applicable departments] | Yes | Implement recommendation ⁵ | Pending | Possibly ⁶ | |
| 9e | Use drip pans, absorbent materials, and other pollution prevention materials to limit leaks of paving materials and fluids from paving machines | Recommended by USEPA ² | Street; [All other applicable departments] | Yes | Implement recommendation | Pending | Possibly ⁶ | |

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| | Name | Justification | | | | (Schedules, Frequency, Etc.) | Justification | |
| 9f | For resurfacing operations, use porous asphalt for potholes and shoulder repair | Recommended by USEPA ² | Street; [All other applicable departments] | Yes | Implement recommendation ⁵ | Pending | Possibly ⁶ | |
| 9g | Sweep and vacuum heavily-traveled roadways | Recommended by USEPA ² | Street | Yes | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ | |
| 9h | Regularly clean runoff control structures such as catch basins | Recommended by USEPA ² | Street; CSD | Yes | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ | |
| 9i | Restrict the use of herbicides, pesticides, and fertilizers on roadway vegetation | Recommended by USEPA ² | Street; [All other applicable departments] | Yes | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ | |
| 9j | Train employees on the proper handling and application of herbicides, pesticides, fertilizers, and other chemicals | Recommended by USEPA ² | Street; [All other applicable departments] | Yes | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ | |
| 9k | Select roadside vegetation with higher salt tolerances | Recommended by USEPA ² | Street; [All other applicable departments] | Yes | Implement recommendation ⁵ | Pending | Possibly ⁶ | |
| 9l | Avoid installing scupper drains on new bridges | Recommended by USEPA ² | Civil Engineering | Yes | Implement recommendation ⁵ | Pending | Possibly ⁶ | |
| 9m | Routinely clean existing scupper drains | Recommended by USEPA ² | Street; [All other applicable departments] | Yes | Implement recommendation ⁵ | Pending | Possibly ⁶ | |
| 9n | Retrofit existing scupper drains with catch basins or otherwise redirecting water to vegetated areas to provide treatment | Recommended by USEPA ² | Street; [All other applicable departments] | Yes | Implement recommendation ⁵ | Pending | Possibly ⁶ | |
| 9o | Use suspended tarps, booms, and vacuums to capture paint, solvents, rust, paint chips, and other pollutants generated by bridge maintenance | Recommended by USEPA ² | Street; [All other applicable departments] | Yes | Implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ | |
| 9p | Provide litter control along roads and bridges | Recommended by USEPA ² | Street; [All other applicable departments] | Yes | Implement recommendation ⁵ | Pending | Possibly ⁶ | |

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| | Name | Justification | | | (Schedules, Frequency, Etc.) | Justification | |
| 9q | Locate snow disposal areas where there are wide vegetative buffers or within berms | Recommended by NEOSWTC ¹ | Street; [All other applicable departments] | Yes | Implement recommendation ⁵ | Continuous/ongoing/as-needed basis | Yes |
| 10 | "Storm Drain System Cleaning" ² | | | | | | |
| 10a | Regularly clean storm drain systems | Recommended by USEPA ² ; NEOSWTC ¹ | CSD | Yes | Continue to implement recommendation • Annual Reporting requirements ⁷ | Required | Yes |
| 10b | Ensure debris collected from storm sewer cleaning is de-watered to sanitary sewer then disposed at solid waste landfill | Required by Ohio EPA | CSD | Yes | Continue to implement recommendation; • Annual Reporting requirements ⁷ | Required | Possibly ⁶ |
| 10c | Implement ditch cleaning | Recommended by NEOSWTC ¹ | Street | Yes | Continue to implement recommendation; • Annual Reporting requirements ⁷ | Continuous/ongoing/as-needed basis | Yes |
| 10d | Implement a trash collection program for open channel MS4s | Recommended by NEOSWTC ¹ | Street; [All other applicable departments] | Yes | Implement recommendation ⁵ | Pending | Yes |
| 11 | "Hazardous Materials Storage" ² | | | | | | |
| 11a | Ensure sufficient aisle space to provide access for inspections and to improve the ease of material transport | Recommended by USEPA ² | [All applicable departments] | Yes | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ |
| 11b | Store materials away from high-traffic areas to reduce the likelihood of accidents that might cause spills or damage to drums, bags, or containers | Recommended by USEPA ² | [All applicable departments] | Yes | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ |
| 11c | Stack containers in accordance with manufacturer's directions to avoid damaging the container or the product itself | Recommended by USEPA ² | [All applicable departments] | Yes | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ |

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| | Name | Justification | | | | (Schedules, Frequency, Etc.) | Justification | |
| 11d | Store containers on pallets or equivalent structures | Delegate the responsibility for management of hazardous materials to personnel trained and experienced in hazardous substance management | Recommended by USEPA ² | [All applicable departments] | Yes | Implement recommendation ⁵ | Pending | Possibly ⁶ |
| 11e | Cover or enclose hazardous materials and handling areas | Prioritize storage locations of the most hazardous materials | Recommended by USEPA ² | [All applicable departments] | Yes | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ |
| 11f | Conduct routine maintenance and inspections of hazardous materials storage areas by appropriately trained employees | Regularly train appropriate employees to maintain and inspect hazardous materials storage areas | Recommended by USEPA ² | [All applicable departments] | Yes | Implement recommendation | Pending | Possibly ⁶ |
| 11g | Improve the maintenance of industrial machinery and other machinery | Establish material storage and inventory controls | Recommended by USEPA ² | [All applicable departments] | Yes | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ |
| 11h | Conduct routine cleaning, inspection, organization, and maintenance of workplaces and facilities where materials are stored or processed | Properly collect and dispose of wastes | Recommended by USEPA ² | [All applicable departments] | Yes | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ |
| 11i | Conduct regular material inventories: | | Recommended by USEPA ² | [All applicable departments] | Yes | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ |
| 12 | "Materials Management"² | | | | | | | |
| 12a | Improve the maintenance of industrial machinery and other machinery | Establish material storage and inventory controls | Recommended by USEPA ² | [All applicable departments] | Yes | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ |
| 12b | Conduct routine cleaning, inspection, organization, and maintenance of workplaces and facilities where materials are stored or processed | Properly collect and dispose of wastes | Recommended by USEPA ² | [All applicable departments] | Yes | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ |
| 12c | Conduct regular material inventories: | | Recommended by USEPA ² | [All applicable departments] | Yes | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ |
| 12d | Improve the maintenance of industrial machinery and other machinery | Establish material storage and inventory controls | Recommended by USEPA ² | [All applicable departments] | Yes | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ |
| 12e | Conduct routine cleaning, inspection, organization, and maintenance of workplaces and facilities where materials are stored or processed | Properly collect and dispose of wastes | Recommended by USEPA ² | [All applicable departments] | Yes | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ |

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| | Name | Justification | | | (Schedules, Frequency, Etc.) | Justification | |
| | <ul style="list-style-type: none"> Identify all hazardous and nonhazardous substances present at the facility Compile a list of all chemicals present and obtain an MSDS for each one Label all containers with the name of the chemical, unit number, expiration date, handling instructions, and health or environmental hazards Make special note of hazardous chemicals that require special handling, storage, or disposal | | | | | | |
| 12f | Train employees about the benefits of proper materials management and to properly respond to spills or leaks | Recommended by USEPA ² | [All applicable departments] | Yes | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ |
| 13 | "Municipal Facilities Management"² | | | | | | |
| 13a | Restrict the use of herbicides, pesticides, and fertilizers at facilities | Recommended by USEPA ² | [All applicable departments] | Yes | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ |
| 13b | Train employees on storm water BMPs and principles | Recommended by USEPA ² | [All applicable departments] | Yes | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ |
| 13c | Develop procedures for properly disposing of waste removed from the City's MS4 (including dredge spoil, accumulated sediments, floatables, and other debris) | Recommended by USEPA ² | Street; CSD | Yes | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ |
| 13d | Evaluate facilities for pollution potential and BMP implementation where chemicals or hazardous materials are stored or disposed of, and at outdoor trash storage areas | Recommended by USEPA ² | [All applicable departments] | Yes | Implement recommendation | Pending | Possibly ⁶ |

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| | | | | | (Schedules, Frequency, Etc.) | Justification | |
| 13e | Obtain coverage under an NPDES industrial storm water permit | Required by Ohio EPA | Water; WRF | Yes | Requirement implemented | | Possibly ⁶ |
| 13f | Develop and implement a facility Storm Water Pollution Prevention Plan (SWP3) in accordance with minimum requirements of the current Ohio EPA NPDES Industrial Storm Water Permit unless "No Exposure" can be certified or otherwise exempt; update accordingly | Required by Ohio EPA | Fire Dept. (Station #1); DMV; Police (Impound Lot) | Yes | <ul style="list-style-type: none"> Implement requirement⁴ (contact the Storm Water Program Coordinator for details); Annual Reporting requirements⁷ | Required | Yes |
| 13g | Update and implement facility SWP3s to reflect minimum requirements of the Ohio EPA General NPDES Permit for Storm Water Associated with Industrial Activities (OHR000005) unless "No Exposure" can be certified or otherwise exempt; update accordingly <ul style="list-style-type: none"> Perform inspection requirements Quarterly routine facility inspections, quarterly visual assessments of storm water discharges, and an annual comprehensive site inspection with annual report | Recommended by NEOSWTC ¹ | Fire Dept. (Station #1); DMV; Police (Impound Lot) | Yes | Implement recommendation* (contact the Storm Water Program Coordinator for details) | Pending | Yes |
| 13h | Conduct routine inspections of facilities to detect leaks, spills, or other pollution issues | Recommended by USEPA ² | [All applicable departments] | Yes | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ |
| 13i | Maintain and operate community-owned sewage treatment systems | Recommended by NEOSWTC ¹ | WRF | Yes | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Yes |
| 13j | Utilize Integrated Pest Management (IPM) on community-owned and operated properties | Recommended by NEOSWTC ¹ | [All applicable departments] | Yes | Implement recommendation ⁵ | Pending | Yes |

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| | Name | Justification | | | | (Schedules, Frequency, Etc.) | Justification | |
| 13k | Implement waste storage in lidded or covered containers | Recommended by NEOSWTC ¹ | Sanitation; [All other applicable departments] | Yes | Implement recommendation | Continuous/ongoing/as-needed basis | Yes | |
| 14 | "Spill Response and Prevention" ² | | | | | | | |
| 14a | Identify potential spill or source areas, such as loading and unloading, storage and processing areas, places that generate dust or particulate matter, and areas designated for waste disposal | Recommended by USEPA ² | [All applicable departments] | Yes | Implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ | |
| 14b | Evaluate spill potential for stationary facilities, including manufacturing areas, warehouses, service stations, parking lots, and access roads | Recommended by USEPA ² | [All applicable departments] | Yes | Implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ | |
| 14c | Recycle, reclaim, or reuse process materials | Recommended by USEPA ² | [All applicable departments] | Yes | Implement recommendation ⁵ | Pending | Possibly ⁶ | |
| 14d | Install leak detection devices, overflow controls, and diversion berms as appropriate for materials handling and storage | Recommended by USEPA ² | [All applicable departments] | Yes | Implement recommendation ⁵ | Pending | Possibly ⁶ | |
| 14e | Disconnect drains from processing areas that lead to storm sewers | Recommended by USEPA ² | [All applicable departments] | Yes | Implement recommendation ⁵ | Pending | Possibly ⁶ | |
| 14f | Perform preventative maintenance on storm tanks, valves, pumps, pipes, and other equipment | Recommended by USEPA ² | [All applicable departments] | Yes | Implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ | |
| 14g | Use material transfer or filling procedures that minimize spills from tanks and other equipment | Recommended by USEPA ² | [All applicable departments] | Yes | Implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ | |
| 14h | Replace toxic materials with less or non-toxic products | Recommended by USEPA ² | [All applicable departments] | Yes | Implement recommendation ⁵ | Pending | Possibly ⁶ | |
| 14i | Provide a well-planned and clearly-defined spill prevention/response plan: | Recommended by USEPA ² | [All applicable departments] | Yes | Implement recommendation | Pending | Possibly ⁶ | |

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| | Name | Justification | | | (Schedules, Frequency, Etc.) | Justification | |
| | <ul style="list-style-type: none"> Identify individuals responsible for implementing the plan Describe safety measures to take with each kind of waste Specify how to notify appropriate authorities such as police and fire departments, hospitals, or publicly-owned treatment works for assistance State procedures for containing, diverting, isolating, and cleaning up the spill Describe spill response equipment to be used, including safety and cleanup equipment | | | | | | |
| 14j | Train employees how to reduce and respond to spills | Recommended by USEPA ² | [All applicable departments] | Yes | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ |
| 14k | Ensure equipment and materials for cleanup are readily accessible and clearly marked with procedures for use | Recommended by USEPA ² | [All applicable departments] | Yes | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ |
| 14l | Update spill prevention/response plan to accommodate any changes in the site/facility or procedures | Recommended by USEPA ² | [All applicable departments] | Yes | Implement recommendation | Pending | Possibly ⁶ |
| 14m | Regularly inspect areas where spills might occur to ensure that procedures are posted and cleanup equipment is readily available | Recommended by USEPA ² | [All applicable departments] | Yes | Continue to implement recommendation | Continuous/ongoing/as-needed basis | Possibly ⁶ |

Other MCM#6 BMPs

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| | Name | Justification | | | (Schedules, Frequency, Etc.) | Justification | |
| 15 | Water Quality Considerations on Flood Management Projects | Required by permit | Civil Engineering | Yes | <ul style="list-style-type: none"> Ensure flood management projects are assessed for water quality impacts; Annual Reporting requirements⁷ | Required | [TBD ^{3,4}] |
| 16 | Ensure community-sponsored portable toilets are maintained and emptied without spills | Recommended by NEOSWTC ¹ | [All applicable departments] | Yes | Implement recommendation | Continuous/ongoing/as-needed basis | Yes |
| 17 | Establish a protection program to obtain riparian development rights; e.g. conservation easements | Recommended by NEOSWTC ¹ | [All applicable departments] | Yes | Implement recommendation ⁵ | Pending | Yes |
| 18 | Relocate stockpiles of waste materials and erodible materials away from stream banks and steep slopes and/or install appropriate sediment controls around such materials | Recommended by NEOSWTC ¹ | [All applicable departments] | Yes | Implement recommendation | Continuous/ongoing/as-needed basis | Yes |
| 19 | Install green infrastructure such as bioretention, permeable pavement, cisterns, green roofs, and infiltration trenches or basins at municipal facilities | Recommended by NEOSWTC ¹ | [All applicable departments] | Yes | Implement recommendation ⁵ | Pending | Yes |
| 20 | Minimize number and width of stream crossings when planning transportation routes | Recommended by NEOSWTC ¹ | [All applicable departments] | Yes | Implement recommendation | Continuous/ongoing/as-needed basis | Yes |
| 21 | Adopt a "Complete Streets" code | Recommended by NEOSWTC ¹ | [All applicable departments] | Yes | Implement recommendation ⁵ | Pending | Yes |
| 22 | Retrofit existing community-owned parking lots to incorporate natural habitat, vegetation, and pervious surfaces | Recommended by NEOSWTC ¹ | Traffic: Parking | Yes | Implement recommendation ⁵ | Pending | Yes |
| 23 | When contract services are utilized for community services, require | Recommended by NEOSWTC ¹ | [All applicable departments] | Yes | Implement recommendation ⁵ | Pending | Yes |

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| | Name | Justification | | | (Schedules, Frequency, Etc.) | Justification | |
| | contract language that ensures BMPs for pollution prevention and good housekeeping | | | | | | |
| 24 | Implement timely stabilization of disturbed soils and soil stockpiles at the service yard, landfills, and on municipal construction activity | Recommended by NEOSWTC ¹ | [All applicable departments] | Yes | Implement recommendation | Continuous/ongoing/as-needed basis | Yes |
| 25 | Establish wash stations directed to sanitary sewers or utilize dry cleanup methods for lawn care equipment, golf carts, and other community vehicles and equipment used in parks and golf course maintenance | Recommended by NEOSWTC ¹ | Parks & Recreation | Yes | Implement recommendation ⁵ | Pending | Yes |
| 26 | Implement protection of catch basins and other appropriate storm water inlets when conducting road repairs, water line repair, and other maintenance activities of respective service departments | Recommended by NEOSWTC ¹ | [All applicable departments] | Yes | Implement recommendation | Continuous/ongoing/as-needed basis | Yes |
| 27 | Establish "pick-up pet waste" stations for residents on public property, parks, community buildings, cemeteries, etc. | Recommended by NEOSWTC ¹ | Parks & Recreation; [Other applicable Depts.] | Yes | Implement recommendation ⁵ | Pending | Yes |
| 28 | Implement a road-kill program and properly store collected carcasses or take to a compost facility licensed to accept | Recommended by NEOSWTC ¹ | Street | Yes | Implement recommendation ⁵ | Pending | Yes |
| 29 | [Other MCM#6 BMPs ^{1,2,3,4,5}] | [TBD ^{3,4,5}] | [Any Department ^{3,4,5}] | [TBD ³] | [TBD ^{3,4,5}] | [TBD ³] | [TBD ^{3,6}] |

¹ Specific BMPs that address TMDLs are recommended by the Northeast Ohio Stormwater Training Council (NEOSWTC). See Total Maximum Daily Loads section of SWMP.

² See USEPA's National Menu of Best Management Practices (BMPs) for Stormwater at:

<https://www.epa.gov/nodes/national-menu-best-management-practices-bmps-stormwater#poll>.

³ To be determined.

⁴ As applicable.

⁵ As feasible.

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⁶ According to the NEOSWTC, the implementation of pollution prevention and good housekeeping practices at community facilities and operations addresses habitat, nutrients, and bacteria TMDLs. Therefore, essentially all BMPs implemented for MCM#6 may possibly address respective TMDLs.

⁷ See "Annual Reporting for MCM#6" below.

Evaluating the Success of MCM#6

There are various ways to measure the City of Canton's success of implementing Minimum Control Measure #6:

- Assess individual BMPs to determine if they have been implemented in accordance with measurable goals, MCM performance standards, and applicable EPA and NEOSWTC recommendations.
- Annual Reports will provide indication of the status of implementation.
- The Storm Water Program Coordinator will conduct an annual review of the program with the Service Director so that appropriate adjustments and actions can be taken.
- Ohio EPA or other entities may conduct sampling of the Nimishillen Creek to determine if corresponding pollutant levels have decreased.
- Ohio EPA may perform audits of the City's Storm Water Management Program.

Annual Reporting for MCM#6

Whenever any of the following BMPs are implemented or are planned to be implemented, the responsible party will need to track corresponding information. The Storm Water Management Program Coordinator will send out annual questionnaires to departments requesting the respective information and possibly other information as well. The information provided will then be utilized to prepare Annual Reports that will be submitted as required to Ohio EPA.

- **Employee Training Program:**

- a. Regarding the previous year (BMP was implemented):

- i. Responsible Party:
 - ii. Measurable Goal:
 - iii. Completed (Yes or No):
 - iv. Topic(s):
 - v. Target Audience:
 - vi. # of Employees Attended:
 - vii. Summary of Activity:
 - viii. Was it Effective (Yes or No)?
 - ix. You are required to maintain supporting documentation. What do you have?

- b. Regarding this year (BMP is planned to be implemented):

- i. Responsible Party:
 - ii. Measurable Goal:
 - iii. Summary of Planned Activities:
 - iv. Proposed Schedule:

- **Municipal Facilities Subject to Program:**

- a. Regarding the previous year (BMP was implemented):

- i. Were vehicle maintenance or equipment cleaning operations performed at the facility?
 1. If "Yes", can the facility certify "No Exposure" of the operations to storm water according to Ohio EPA's No Exposure Certification?
 - ii. Is there a Storm Water Pollution Prevention Plan specifically developed for the facility?
 - iii. What operation and maintenance procedures have been developed for the facility with respect to storm water pollution prevention?
 - iv. # of Facility Inspections Performed:
 - v. Frequency of Inspections:
 - vi. You are required to maintain supporting documentation. What do you have?

- b. Regarding this year (BMP is planned to be implemented):

- i. Responsible Party:
 - ii. Measurable Goal:
 - iii. Summary of Planned Activities:
 - iv. Proposed Schedule:

- **MS4 Maintenance:**

City of Canton Storm Water Management Program

- a. Regarding the previous year (BMP was implemented):
 - i. Summarize Maintenance Activities and Schedules (in general):
 - ii. Summarize Activities Performed (provide specifics):
 - iii. You are required to maintain supporting documentation. What do you have?
 - iv. **Disposal of Wastes:**
 - 1. What procedures are developed to ensure waste removed from MS4 maintenance operations is properly disposed?
 - 2. Document Amounts of Wastes Properly Disposed (Report the number of tons of waste removed from the MS4 and disposed at landfills during the reporting period):
 - 3. You are required to maintain supporting documentation. What do you have?
 - b. Regarding this year (BMP is planned to be implemented):
 - i. Responsible Party:
 - ii. Measurable Goal:
 - iii. Summary of Planned Activities:
 - iv. Proposed Schedule:
 - v. **Disposal of Wastes:**
 - 1. Responsible Party:
 - 2. Measurable Goal:
 - 3. Summary of Planned Activities:
 - 4. Proposed Schedule:
- **Road Salt:**
 - a. Regarding the previous year (BMP was implemented):
 - i. Is Salt Storage Covered (Yes or No)?
 - ii. Amount (lbs or tons) Used (January – December):
 - iii. Summarize Measures Taken to Minimize Usage (salting policies, use of anti-icers or additives, spreader calibration practices, etc.):
 - iv. You are required to maintain supporting documentation. What do you have?
 - b. Regarding this year (BMP is planned to be implemented):
 - i. Responsible Party:
 - ii. Measurable Goal:
 - iii. Summary of Planned Activities:
 - iv. Proposed Schedule:
 - **Pesticide and Herbicide Usage:**
 - a. Regarding the previous year (BMP was implemented):
 - i. Have procedures or Best Management Practices been developed to limit storm water pollution from pesticides and/or herbicides (Yes or No)?
 - ii. Gallons of Pesticides Used:
 - iii. Gallons of Herbicides Used:
 - iv. Summarize Measures Taken to Minimize Usage:
 - v. You are required to maintain supporting documentation. What do you have?
 - b. Regarding this year (BMP is planned to be implemented):
 - i. Responsible Party:
 - ii. Measurable Goal:
 - iii. Summary of Planned Activities:
 - iv. Proposed Schedule:
 - **Fertilizer Usage:**
 - a. Regarding the previous year (BMP was implemented):
 - i. Have procedures or Best Management Practices been developed to limit storm water pollution from the usage of fertilizers (Yes or No)?
 - ii. Pounds Used:

City of Canton Storm Water Management Program

- iii. Summarize Measures Taken to Minimize Usage:
- iv. You are required to maintain supporting documentation. What do you have?
- b. Regarding this year (BMP is planned to be implemented):
 - i. Responsible Party:
 - ii. Measurable Goal:
 - iii. Summary of Planned Activities:
 - iv. Proposed Schedule:
- **Street/Lot Sweeping:**
 - a. Regarding the previous year (BMP was implemented):
 - i. Were procedures in place to properly manage and dispose or beneficially reuse street/lot sweepings (Yes or No)?
 - ii. # of lane-miles swept and/or # of lots swept:
 - iii. Document Amount of Material Collected and Properly Disposed (at a solid waste facility):
 - iv. You are required to maintain supporting documentation. What do you have?
 - b. Regarding this year (BMP is planned to be implemented):
 - i. Responsible Party:
 - ii. Measurable Goal:
 - iii. Summary of Planned Activities:
 - iv. Proposed Schedule:
- **Flood Management Projects:**
 - a. Regarding the previous year (BMP was implemented):
 - i. Summarize any New or Existing Flood Management Projects that were assessed for Impacts on Water Quality:
 - ii. You are required to maintain supporting documentation. What do you have?
 - b. Regarding this year (BMP is planned to be implemented):
 - i. Responsible Party:
 - ii. Measurable Goal:
 - iii. Summary of Planned Activities:
 - iv. Proposed Schedule:

Further Guidance and Information for MCM#6

See the "Additional Information" section of this Storm Water Management Program.

Reviewing & Updating the Storm Water Management Program

Since new information and guidance is frequently made available and implementation challenges or changes will likely occur throughout the permit term, the City of Canton's SWMP should be considered a "dynamic" document. Thus, the Storm Water Program Coordinator may make revisions to it from time to time. Any requirements of or revisions made to this SWMP may be reviewed by the City of Canton Director of Public Service, who may affirm, modify, or rescind the same. If revisions are made, the cover page and the end of the revised section will both contain:

"Latest revision: [date]"

Actual revisions may be identified by comparing against previous versions of the respective sections.

Additional Information

For background and related information pertaining to the NPDES Small MS4 Program as well as the supplemental information for the City of Canton Storm Water Management Program, see:

- **Ohio EPA's NPDES Permit No.: OHQ000003 "Authorization for Small Municipal Separate Storm Sewer Systems to Discharge Storm Water Under the National Pollutant Discharge Elimination System":**
See Appendix 1
- **Letter from Ohio EPA to City of Canton granting approval under Ohio EPA NPDES General Permit OHQ000003:**
See Appendix 2
- **Memorandum Of Understanding (MOU) between City of Canton and Stark SWCD**
<http://cantonohio.gov/engineering/?pg=510>
- **Memorandum Of Understanding (MOU) between Service Director and City Health Department**
<http://cantonohio.gov/engineering/?pg=510>
- **"City of Canton Illicit Discharge Detection & Elimination Response Protocol" flowchart:**
<http://cantonohio.gov/engineering/?pg=510>
- **"City of Canton Permits and Plan Review Process" flowchart:**
<http://cantonohio.gov/engineering/>
- **"City of Canton Drainage Complaint General Guidance" table:**
<http://cantonohio.gov/engineering/?pg=510>.
- **City of Canton main website:**
<http://cantonohio.gov/>
- **City of Canton codified ordinances (including Chapter 961 "Storm Water Management"):**
<http://www.conwaygreene.com/canton.htm>
- **City of Canton Storm Water Management webpage (including the "City of Canton Storm Water Management Manual"):**
<http://cantonohio.gov/engineering/?pg=510>
- **Ohio EPA's "Guidance for MS4 Operated Industrial Facilities" flowchart:**
http://www.epa.ohio.gov/portals/35/permits/MS4_industrial_guidance_jun09.pdf
- **Ohio EPA's "No Exposure Certification for Exclusion from NPDES Storm Water Permitting":**
http://www.epa.ohio.gov/portals/35/storm/no_exposure_certification_fis.pdf

City of Canton Storm Water Management Program

- **Ohio EPA Storm Water Program (including ODNR's Rainwater and Land Development Manual):**
<http://epa.ohio.gov/dsw/storm/index.aspx>
- **USEPA BMP Fact Sheets and resources:**
<https://www.epa.gov/npdes/national-menu-best-management-practices-bmps-stormwater#edu>
- **Nimishillen Creek TMDL Report Fact Sheet:**
http://epa.ohio.gov/portals/35/tmdl/NimishillenCreekTMDL_fact_sheet_dec09.pdf
- **Nimishillen Creek TMDL Report:**
http://epa.ohio.gov/portals/35/tmdl/NimishillenCreekTMDL_final_oct09_wo_app.pdf
- **Recommended BMPs for Addressing TMDLs (Fact Sheets): Northeast Ohio Storm Water Training Council website:**
<http://nehiostormwater.com/index.html>
- **Stark Soil & Water Conservation District (SWCD) website:**
<https://www.starkswcd.org/>
- **USEPA NPDES resources:**
<https://www.epa.gov/npdes>

Appendices

Appendix 1: Ohio EPA's NPDES Permit No.: OHQ000003 "Authorization for Small Municipal Separate Storm Sewer Systems to Discharge Storm Water Under the National Pollutant Discharge Elimination System" (24 pages)

Appendix 2: Letter from Ohio EPA to City of Canton granting approval under Ohio EPA NPDES General Permit OHQ000003 (1 page)

Appendix 1:

Ohio EPA's NPDES Permit No.: OHQ000003 "Authorization for Small Municipal Separate Storm Sewer Systems to Discharge Storm Water Under the National Pollutant Discharge Elimination System"

OHIO E.P.A.

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NPDES Permit No.: OHQ000003

Issuance Date: September 11, 2014
Effective Date: September 11, 2014
Expiration Date: September 10, 2019

OHIO ENVIRONMENTAL PROTECTION AGENCY

**AUTHORIZATION FOR SMALL MUNICIPAL SEPARATE STORM SEWER
SYSTEMS TO DISCHARGE STORM WATER UNDER THE
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM**

In compliance with the provisions of the Federal Water Pollution Control Act, as amended (33 U.S.C. 1251 et. seq. hereafter referred to as "the Act"), and the Ohio Water Pollution Control Act (Ohio Revised Code Chapter 6111), dischargers of storm water from Small Municipal Separate Storm Sewer Systems, as defined in Part VI of this permit, are authorized by the Ohio Environmental Protection Agency, hereafter referred to as "Ohio EPA," to discharge from the outfalls and to the receiving surface waters of the state identified in their Notices of Intent (NOI) Application form on file with Ohio EPA in accordance with the conditions specified in this permit.

It has been determined that a lowering of water quality of various waters of the state associated with granting coverage under this permit is necessary to accommodate important social and economic development in the state of Ohio. In accordance with OAC 3745-1-05, this decision was reached only after examining a series of technical alternatives, reviewing social and economic issues related to the degradation, and considering all public and intergovernmental comments received concerning the proposal.

Granting of general permit coverage is conditioned upon submittal of a complete NOI Application in accordance with Part I.D of this permit and written approval of coverage from the director of Ohio EPA.

**I certify this to be a true and accurate copy of the
official documents as filed in the records of the Ohio
Environmental Protection Agency.**



Craig W. Butler
Director

By:  Date: 9-12-14

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PART VI. DEFINITIONS

PART I. COVERAGE UNDER THIS PERMIT

A. Permit Area

This permit covers the state of Ohio.

B. Eligibility

1. All small municipal separate storm sewer systems (MS4s) unless the director of Ohio EPA has given written notification to an MS4 that coverage under this general permit is inappropriate.
2. This permit authorizes discharges of storm water from small MS4s, as defined in Part VI of this permit. You are authorized to discharge under the terms and conditions of this general permit if you:
 - a. Operate a small MS4 within the permit area described in Part I.A of this permit,
 - b. Are not a "large" or "medium" MS4 as defined in Part VI of this permit, and
 - c. Submit a Notice of Intent (NOI) in accordance with Part II of this permit, and
 - d. Are located fully or partially within an urbanized area as determined by the latest Decennial Census by the Bureau of Census, or
 - e. Are designated for permit authorization by Ohio EPA.
3. The following are types of authorized discharges:
 - a. *Storm water discharges.* This permit authorizes storm water discharges to surface waters of the State from the small MS4s identified in Part I.B.2, except as excluded in Part I.C.
 - b. *Non-storm water discharges.* You are authorized to discharge the following non-storm water sources provided that Ohio EPA has not determined, and notified you in writing, these sources are substantial contributors of pollutants to your MS4: waterline flushing; landscape irrigation; diverted stream flows; rising ground waters; uncontaminated ground water infiltration (infiltration is defined as water other than wastewater that enters a sewer system, including sewer service connections and foundation drains, from the ground through such means as defective pipes, pipe joints, connections, or manholes. Infiltration does not include, and is distinguished from, inflow.); uncontaminated pumped ground water; discharges from potable water sources; foundation drains; air conditioning condensate; irrigation water; springs; water from crawl space pumps; footing drains; lawn watering; individual residential car washing; flows from riparian habitats and wetlands; dechlorinated swimming pool discharges; street wash water; and discharges or flows from fire-fighting activities.

C. Limitations on Coverage

This permit does not authorize:

1. Discharges that are mixed with sources of non-storm water unless such non-storm water discharges are:
 - a. In compliance with a separate National Pollutant Discharge Elimination System (NPDES) permit, or
 - b. Determined by Ohio EPA not to be a substantial contributor of pollutants to surface waters of the state.

2. Storm water discharges associated with industrial activity as defined in 40 CFR §122.26(b)(14)(i)-(ix) and (xi) that are not in compliance with a separate in force NPDES permit.
3. Storm water discharges associated with construction activity as defined in 40 CFR §122.26(b)(14)(x) or 40 CFR §122.26(b)(15) that are not in compliance with a separate in force NPDES permit.
4. Storm water discharges currently covered under another NPDES permit.
5. Discharges that would cause or contribute to in-stream exceedances of water quality standards. Ohio EPA may require additional actions or an application for an individual permit or alternative general permit if an MS4 is determined to cause an in-stream exceedance of water quality standards.
6. Discharges of any pollutant into any water for which a Total Maximum Daily Load (TMDL) has been approved by U.S. EPA (this information can be obtained from Ohio EPA) unless your discharge is consistent with that TMDL. This eligibility condition applies at the time you submit an NOI for coverage. For discharges that cannot comply with TMDL requirements under this permit, you will be instructed by Ohio EPA to apply for an individual or other applicable general NPDES permit.
7. Discharges that do not comply with Ohio EPA's anti-degradation policy for water quality standards.

D. Obtaining Authorization

1. To be authorized to discharge storm water from small MS4s, you shall submit a completed NOI form, application fee and your Storm Water Management Program (SWMP) in accordance with the deadlines presented in Part II.A of this permit. To renew coverage you shall only submit a completed NOI form and application fee.
2. Your NOI, to be completed on a form furnished by Ohio EPA, shall be signed and dated in accordance with Part V.G of this permit.
3. Until notified in writing by Ohio EPA, dischargers who submit an NOI in accordance with the requirements of this permit are not covered by this permit. The Agency may deny coverage under this permit and require submittal of an application for an individual NPDES permit or alternative general permit based on a review of the NOI or other information (see Part V.Q).
4. Where an operator is added or removed after submittal of an NOI under Part II of this permit, a new NOI shall be submitted in accordance with Part II prior to the change.

PART II. NOTICE OF INTENT REQUIREMENTS

A. Deadlines for Notification

1. If you were automatically designated by the 2000 Census under 40 CFR §122.32(a)(1) to obtain coverage, then you were required to submit an NOI and your SWMP or apply for an individual permit by March 10, 2003. If you were automatically designated by the 2010 Census under 40 CFR §122.32(a)(1) to obtain coverage under this permit, then you are required to submit an NOI and your SWMP to Ohio EPA within 180 days of notice.
2. *Additional designations.* If you are designated by Ohio EPA, then you are required to submit an NOI and your SWMP to Ohio EPA within 180 days of notice.
3. *Submitting a Late NOI.* You are not prohibited from submitting an NOI after the dates provided in Part II.A of this permit. If a late NOI is submitted, your authorization is only for discharges that occur

after permit coverage is granted. Ohio EPA reserves the right to take appropriate enforcement actions against MS4s that have not submitted a timely NOI.

4. *Renewal.* If you have coverage under the previous version of this permit you will receive notification with instructions for renewing coverage under this permit. Within 90 days of receiving Ohio EPA's notification, you shall submit a completed NOI form and application fee. When Ohio EPA renews this permit, if you have coverage under this permit you will receive notification of the renewal along with instructions for getting coverage under the renewal permit.

B. Where to Submit

You are to submit your NOI, signed in accordance with the signatory requirements of Part V.G of this permit, to Ohio EPA at the following address:

Ohio EPA
Office of Fiscal Administration
P.O. Box 1049
Columbus, Ohio 43216-1049

C. Co-Permittees Under a Single NOI

You may partner with other MS4s to develop and implement your SWMP. You may also jointly submit an NOI with one or more MS4s. Your SWMP shall clearly describe which permittees are responsible for implementing each of the control measures.

PART III. STORM WATER MANAGEMENT PROGRAMS (SWMP)

A. Requirements

1. You shall develop, implement, and enforce an SWMP designed to reduce the discharge of pollutants from your small MS4 to the maximum extent practicable (MEP), to protect water quality, and to satisfy the appropriate water quality requirements of Ohio Revised Code (ORC) 6111 and the Clean Water Act. The SWMP should include management practices; control techniques and system, design, and engineering methods; and shall be modified to include provisions as Ohio EPA determines appropriate after its review of the program for the control of such pollutants. Your SWMP shall include the following information for each of the six minimum control measures described in Part III.B of this permit:
 - a. The best management practices (BMPs) that you or another entity will or already does implement for each of the storm water minimum control measures. Where applicable, BMPs shall be selected to address U.S. EPA approved TMDL recommendations for identified water quality problems associated with MS4 discharges within your MS4's watershed(s).
 - b. For each BMP identified, statements indicating whether you believe you have the legal authority to implement said BMP.
 - c. The measurable goals for each of the BMPs, the ones you believe you have the authority to implement, including, as appropriate, the months and years in which you will undertake required actions, including interim milestones and the frequency of the action. At a minimum, measurable goals shall be implemented to satisfy this general permit's performance standards; and
 - d. The person or persons, including position title or titles, responsible for implementing or coordinating the BMPs for your SWMP. The SWMP shall include a Table of Organization, including a primary point of contact, which identifies how implementation across multiple positions, agencies and departments will occur.

- e. In addition to the requirements listed above, you shall provide a rationale for how and why you elected each of the BMPs and measurable goals for your SWMP, including how selected BMPs address applicable TMDL recommendations.
2. If you are obtaining your initial Small MS4 general permit coverage under this permit, you shall develop and implement your program within five years of being granted coverage under this permit. If you are renewing coverage under this permit, you shall update your SWMP to be consistent with requirements of this permit and submit to your appropriate Ohio EPA District Office within 2 years of when your coverage under this general permit was granted.

B. Minimum Control Measures

The six minimum control measures that shall be included in your SWMP are:

1. Public Education and Outreach on Storm Water Impacts

- a. You shall implement a public education program to distribute educational materials to the community or conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps that the public can take to reduce pollutants in storm water runoff. In the case of non-traditional MS4s (e.g., OTIC, ODOT, universities, hospitals, prisons, military bases, and other government complexes), you are only required to provide educational materials and outreach to your employees, on-site contractors, and individuals using your facilities.
- b. *Decision process.* You shall document your decision process for the development of a storm water public education and outreach program. Your rationale statement shall address both your overall public education program and the individual BMPs, measurable goals and responsible persons for your program. The rationale statement shall include the following information, at a minimum:
 - i. How you plan to inform individuals and households about the steps they can take to reduce storm water pollution.
 - ii. How you plan to inform individuals and groups on how to become involved in the storm water program (with activities such as local stream and beach restoration activities).
 - iii. Who are the target audiences for your education program who are likely to have significant storm water impacts (including commercial, industrial and institutional entities) and why those target audiences were selected.
 - iv. What are the target pollutant sources your public education program is designed to address.
 - v. What is your outreach strategy, including the mechanisms (e.g., printed brochures, newspapers, media, workshops, etc.) you will use to reach your target audiences, and how many people do you expect to reach by your outreach strategy over the permit term.
 - vi. Who (person or department) is responsible for overall management and implementation of your storm water public education and outreach program and, if different, who is responsible for each of the BMPs identified for this program.
 - vii. How will you evaluate the success of this minimum measure, including how you selected the measurable goals for each of the BMPs.

- c. *Performance Standards.* Your storm water public education and outreach program shall include more than one mechanism and target at least five different storm water themes or messages over the permit term. At a minimum, at least one theme or message shall be targeted to the development community. Your storm water public education and outreach program shall reach at least 50 percent of your population over the permit term.
- d. *Annual Reporting.* Your annual report shall identify each mechanism used, including each storm water theme, audience targeted and estimate of how many people were reached by each mechanism.

2. Public Involvement/Participation

- a. You shall comply with State and local public notice requirements and satisfy this minimum control measure's minimum performance standards when implementing a public involvement/participation program. In the case of non-traditional MS4s (e.g., OTIC, ODOT, universities, hospitals, prisons, military bases, and other government complexes), you are required to involve employees, on-site contractors, and individuals using your facilities.
- b. *Decision process.* You shall document your decision process for the development of a storm water public involvement/participation program. Your rationale statement shall address both your overall public involvement/participation program and the individual BMPs, measurable goals, and responsible persons for your program. The rationale statement shall include the following information, at a minimum:
 - i. Have you involved the public in the development and submittal of your NOI and SWMP description.
 - ii. What is your plan to actively involve the public in the development and implementation of your program.
 - iii. Who are the target audiences for your public involvement program, including a description of the types of ethnic and economic groups engaged. You are encouraged to actively involve all potentially affected stakeholder groups, including commercial and industrial businesses, trade associations, environmental groups, homeowners associations, and educational organizations, among others.
 - iv. What are the types of public involvement activities included in your program. Where appropriate, consider the following types of public involvement activities: citizen representatives on a storm water management panel, public hearings, working with citizen volunteers willing to educate others about the program, volunteer monitoring or stream/beach clean-up activities.
 - v. Who (person or department) is responsible for the overall management and implementation of your storm water public involvement/participation program and, if different, who is responsible for each of the BMPs identified for this program.
 - vi. How you will evaluate the success of this minimum measure, including how you selected the measurable goals for each of the BMPs.
- c. *Performance Standards.* Your storm water public involvement/participation program shall include, at a minimum, five public involvement activities over the permit term.
- d. *Annual Reporting.* Your annual report shall identify each public involvement/participation activity conducted, including a brief description of activity and include an estimate of how many people participated.

3. Illicit Discharge Detection and Elimination

- a. You shall develop, implement and enforce a program to detect and eliminate illicit discharges, as defined in Part VI of this permit, into your small MS4 (for illicit discharges to your MS4 via an adjacent, outside of your jurisdiction, interconnected MS4, you are only required to inform the neighboring MS4 and Ohio EPA in your annual report submission, of their existence);
- b. You shall develop, if not already completed, a comprehensive storm sewer system map, showing the location of all outfalls and the names and location of all surface waters of the state that receive discharges from those outfalls. Your comprehensive storm sewer system map shall also include your MS4 system (owned and/or operated by you), including catch basins, pipes, ditches, flood control facilities (retention/detention ponds), post-construction water quality BMPs and private post-construction water quality BMPs which have been installed to satisfy Ohio EPA's NPDES Construction Storm Water general permit and/or your local post-construction water quality BMP requirements.
- c. Within five years of when your initial Small MS4 general permit coverage was granted, you shall submit the following to Ohio EPA:
 - i. A list of all on-site sewage disposal systems connected to discharge to your MS4 (a.k.a., home sewage treatment systems (HSTSs)) including the addresses; and
 - ii. A storm sewer map showing the location of all HSTSs connected to your MS4. This map shall include details on the type and size of conduits/ditches in your MS4 that receive discharges from HSTSs, as well as the water bodies receiving the discharges from your MS4.
- d. You shall to the extent allowable under State or local law, effectively prohibit, through ordinance, or other regulatory mechanism, illicit discharges into your storm sewer system and implement appropriate enforcement procedures and actions;
- e. You shall develop and implement a plan to detect and eliminate non-storm water discharges, including illegal dumping, to your system. At a minimum, for household sewage treatment systems (HSTSs), your plan shall address or include provisions for:
 - i. Working with the appropriate Board(s) of County Commissioners, other public officials, local waste water authorities, any other appropriate entity and local board(s) of health to proactively identify residences with existing individual discharging HSTSs that can be legally, feasibly and economically connected to central sewers. At a minimum, the plan shall evaluate applying provisions identified by ORC 6117.51 and other applicable State and local laws and/or regulations. At a minimum, this activity should require connection to central sewers for any discharging HSTS that is not operating as designed and intended if feasible, but it does not preclude connection to central sewers of any HSTS if local planning and coordination recommends such;
 - ii. Working with local board(s) of health to develop a proactive operation and maintenance program or implement/enhance an existing operation and maintenance program which determines if existing discharging HSTSs are operating as designed and intended and, for those not meeting this criteria, requires elimination, upgrade or replacement of the systems as appropriate. For HSTS discharges that cannot be eliminated through connection to central sewers or installation of soil absorption systems, the property owner must be notified of the requirement to pursue coverage under an appropriate Ohio EPA general NPDES permit;
 - iii. Actively investigating the source(s) of contamination in outfalls identified during dry weather screening process. When the contamination source has been identified as discharging HSTS that is not operating as designed and intended, work with the local

board(s) of health to determine proper course of action in resolving the non-functioning HSTS with connection to central sewers being preferred alternative, followed by replacing system with a soil absorption system that does not discharge and only allowing a replacement discharging HSTS when no other option is available. For HSTS discharges that cannot be eliminated through connection to central sewers or installation of soil absorption systems, the property owner must be notified of the requirement to pursue coverage under an appropriate Ohio EPA general NPDES permit; and

- iv. Working with local waste water authorities, planning agencies or other appropriate agencies involved to evaluate the planned or possible future installation of sewers for areas which contain high densities of discharging HSTSs.
- f. You shall inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste; and
- g. You shall address the following categories of non-storm water discharges or flows (i.e., illicit discharges) only if you or Ohio EPA has identified them as significant contributors of pollutants to your small MS4: water line flushing, landscape irrigation, diverted stream flows, rising ground waters, uncontaminated ground water infiltration (as defined at 40 CFR §35.2005(20)), uncontaminated pumped ground water, discharges from potable water sources, foundation drains, air conditioning condensation, irrigation water, springs, water from crawl space pumps, footing drains, lawn watering, individual residential car washing, flows from riparian habitats and wetlands, dechlorinated swimming pool discharges, street wash water, and discharges or flows from fire-fighting activities (by definition, not an illicit discharge).
- h. You may also develop a list of other similar occasional incidental non-storm water discharges (e.g., non-commercial or charity car washes, etc.) that will not be addressed as illicit discharges. These non-storm water discharges must not be reasonably expected (based on information available to the permittees) to be significant sources of pollutants to the MS4, because of either the nature of the discharges or conditions you have established for allowing these discharges to your MS4 (e.g., a charity car wash with appropriate controls on frequency, proximity to sensitive water bodies, BMPs on the wash water, etc.). You must document in your SWMP any local controls or conditions placed on the discharges. You must include a provision prohibiting any individual non-storm water discharge that is determined to be contributing significant amounts of pollutants to your MS4.
- i. Decision process. You shall document your decision process for the development of a storm water illicit discharge detection and elimination program. Your rationale statement shall address both your overall illicit discharge detection and elimination program and the individual BMPs, measurable goals, and responsible persons for your program. The rationale statement shall include the following information, at a minimum:
 - i. How you will develop a comprehensive storm sewer map showing the location of all outfalls and the names and location of all receiving waters. Describe the sources of information you used for the maps, and how you plan to verify the outfall locations with field surveys. If already completed, describe how you developed this map. Also, describe how your map will be regularly updated.
 - ii. The mechanism (ordinance or other regulatory mechanism) you will use to effectively prohibit illicit discharges into the MS4 and why you chose that mechanism. If you need to develop this mechanism, describe your plan and a schedule to do so. If your ordinance or regulatory mechanism is already developed, include a copy of the relevant sections with your program.

- iii. Your plan to ensure through appropriate enforcement procedures and actions that your illicit discharge ordinance (or other regulatory mechanism) is implemented.
- iv. Your plan to detect and address illicit discharges to your system, including discharges from illegal dumping and spills. Your plan shall include dry weather field screening for non-storm water flows and Ohio EPA recommends field tests of selected chemical parameters as indicators of discharge sources. You shall describe the mechanisms and strategies you will implement to ensure outfalls which have previously been dry-weather screened will not have future illicit connections. Your plan shall also address on-site sewage disposal systems (including failing on-lot HSTs and off-lot discharging HSTs) that flow into your storm drainage system. Your description shall address the following, at a minimum:
 - 1. Procedures for locating priority areas which include areas with higher likelihood of illicit connections (e.g., areas with older sanitary sewer lines, for example) or ambient sampling to locate impacted reaches;
 - 2. Procedures for tracing the source of an illicit discharge, including the specific techniques you will use to detect the location of the source;
 - 3. Procedures for removing the source of the illicit discharge; and
 - 4. Procedures for program evaluation and assessment.
- v. How you plan to inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste. Include in your description how this plan will coordinate with your public education minimum measure and your pollution prevention/good housekeeping minimum measure programs.
- vi. Who is responsible for overall management and implementation of your storm water illicit discharge detection and elimination program and, if different, who is responsible for each of the BMPs identified for this program.
- vii. How you will evaluate the success of this minimum measure, including how you selected the measurable goals for each of the BMPs.
- j. *Performance Standards.* Your storm water illicit discharge detection and elimination program shall include or have included an initial dry-weather screening of all your storm water outfalls over the permit term. Your program shall establish priorities and specific goals for long-term system-wide surveillance of your MS4, as well as for specific investigations of outfalls and their tributary area where previous surveillance demonstrates a high likelihood of illicit discharges. Data collected each year shall be evaluated and priorities and goals shall be revised annually based on this evaluation. Your comprehensive storm sewer system map shall be updated annually as needed.
- k. *Annual Reporting.* Your annual report shall document the following: (1) number of outfalls dry-weather screened, (2) number of dry-weather flows identified, (3) number of illicit discharges identified, (4) number of illicit discharges eliminated, (5) a list of all illicit connections that have been identified but have yet to be eliminated, including estimated schedules for elimination and (6) summary of any storm sewer system mapping updates.

4. Construction Site Storm Water Runoff Control

- a. You shall develop, implement, and enforce a program to reduce pollutants in any storm water runoff to your small MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. Reduction of pollutants in storm water discharges from construction activity disturbing less than one acre shall be included in your program if that construction activity is part of a larger common plan of development or sale that would disturb one acre or more. If Ohio EPA waives requirements for storm water discharges associated with small construction from a specific site(s), you are not required to enforce your program to reduce pollutant discharges from such site(s). Your program shall include the development and implementation of, at a minimum:
- i. An ordinance or other regulatory mechanism to require erosion and sediment controls, as well as sanctions to ensure compliance, to the extent allowable under State or local law. Your ordinance or other regulatory mechanism shall, at a minimum, be equivalent with the technical requirements set forth in the Ohio EPA NPDES General Storm Water Permit(s) for Construction Activities applicable for your permit area which have been issued at the time of issuance of this permit. This would include the following Ohio EPA NPDES General Storm Water Permits for Construction Activities: OHC000004, OHCD00002 and OHCO00002. If you had coverage under the previous version of this permit, you shall revise your ordinance or other regulatory mechanism, if needed, within two years of when your coverage under this general permit was granted;
 - ii. Requirements for construction site operators to implement appropriate erosion and sediment control BMPs;
 - iii. Requirements for construction site operators to control waste such as, but not limited to, discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that may cause adverse impacts to water quality;
 - iv. Procedures for storm water pollution prevention plan review which incorporate consideration of potential water quality impacts;
 - v. Procedures for receipt and consideration of information submitted by the public; and
 - vi. Procedures for site inspection and enforcement of control measures.
- b. *Decision process.* You shall document your decision process for the development of a construction site storm water control program. Your rationale statement shall address both your overall construction site storm water control program and the individual BMPs, measurable goals, and responsible persons for your program. The rationale statement shall include the following information, at a minimum:
- i. The mechanism (ordinance or other regulatory mechanism) you will use to require erosion and sediment controls at construction sites and why you chose that mechanism. If you need to develop this mechanism, describe your plan and a schedule to do so. If your ordinance or regulatory mechanism is already developed, include a copy of the relevant sections with your SWMP description;
 - ii. Your plan to ensure compliance with your erosion and sediment control regulatory mechanism, including the sanctions and enforcement mechanisms you will use to ensure compliance. Describe your procedures for when you will use certain sanctions. Possible sanctions include non-monetary penalties (such as a stop work orders), fines, bonding requirements, and/or permit denials for non-compliance;
 - iii. Your requirements for construction site operators to implement appropriate erosion and sediment control BMPs and control waste at construction sites that may cause adverse

impacts to water quality. Such waste includes, but is not limited to, discarded building materials, concrete truck washouts, chemicals, litter, and sanitary waste;

- iv. Your procedures for pre-construction storm water pollution prevention plan review which incorporate consideration of potential water quality impacts. Describe the estimated number of sites that will have pre-construction site plans reviewed;
 - v. Your procedures for receipt and consideration of information submitted by the public. Consider coordinating this requirement with your public education program;
 - vi. Your procedures for site inspection and enforcement of control measures, including how you will prioritize sites for inspection;
 - vii. Who is responsible for overall management and implementation of your construction site storm water control program and, if different, who is responsible for each of the BMPs identified for this program; and
 - viii. Describe how you will evaluate the success of this minimum measure, including how you selected the measurable goals for each of the BMPs.
- c. *Performance Standards.* Your construction site storm water control program shall include a pre-construction storm water pollution prevention plan review of all projects from construction activities that result in a land disturbance of greater than or equal to one acre. To ensure compliance, these applicable sites shall be initially inspected. The frequency of follow-up inspections shall be on a monthly basis unless you document your procedures for prioritizing inspections such as location to a waterway, amount of disturbed area, compliance of site, etc.
- d. *Annual Reporting.* Your annual report shall document the following: (1) number of applicable sites in your jurisdiction, (2) number of pre-construction storm water pollution prevention plan reviews performed, (3) number and frequency of site inspections, (4) number of violation letters issued, (5) number of enforcement actions taken and (6) number of complaints received and number followed up on.

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

- a. You shall develop, implement, and enforce a program to address storm water runoff from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale, that discharge into your small MS4. Your program shall ensure that controls are in place that will prevent or minimize water quality impacts;
- b. You shall develop and implement strategies which include a combination of structural and/or non-structural BMPs appropriate for your community;
- c. You shall use an ordinance or other regulatory mechanism to address post-construction runoff from new development and redevelopment projects to the extent allowable under State or local law. Your ordinance or other regulatory mechanism shall, at a minimum, be equivalent with the technical requirements set forth in the Ohio EPA NPDES General Storm Water Permit(s) for Construction Activities applicable for your permit area which have been issued at the time of issuance of this permit. This would include the following Ohio EPA NPDES General Storm Water Permits for Construction Activities: OHC000004, OHCD00002 and OHCO00002. If you had coverage under the previous version of this permit, you shall revise your ordinance or other regulatory mechanism, if needed, within two years of when your coverage under this general permit was granted; and
- d. You shall ensure adequate long-term operation and maintenance of BMPs.

- e. *Decision process.* You shall document your decision process for the development of a post-construction SWMP. Your rationale statement shall address both your overall post-construction SWMP and the individual BMPs, measurable goals, and responsible persons for your program. The rationale statement shall include the following information, at a minimum:
- i. Your program to address storm water runoff from new development and redevelopment projects. Include in this description any specific priority areas for this program.
 - ii. How your program will be specifically tailored for your local community, minimize water quality impacts, and attempt to maintain pre-development runoff conditions.
 - iii. Any non-structural BMPs in your program, including, as appropriate: green infrastructure storm water management techniques, policies and ordinances that provide requirements and standards to direct growth to identified areas, protect sensitive areas such as wetlands and riparian areas, maintain and/or increase open space (including a dedicated funding source for open space acquisition), provide buffers along sensitive water bodies, minimize impervious surfaces, and minimize disturbance of soils and vegetation; policies or ordinances that encourage infill development in higher density urban areas, and areas with existing storm sewer infrastructure; education programs for developers and the public about project designs that minimize water quality impacts; and other measures such as minimization of the percentage of impervious area after development, use of measures to minimize directly connected impervious areas, and source control measures often thought of as good housekeeping, preventive maintenance and spill prevention.
 - iv. Any structural BMPs in your program, including, as appropriate: green infrastructure storm water management techniques, storage practices such as wet ponds and extended-detention outlet structures; filtration practices such as grassed swales, bioretention cells, sand filters and filter strips; and infiltration practices such as infiltration basins and infiltration trenches.
 - v. The mechanisms (ordinance or other regulatory mechanisms) you will use to address post-construction runoff from new developments and redevelopments and why you chose the mechanism(s). If you need to develop a mechanism, describe your plan and a schedule to do so. If your ordinance or regulatory mechanism is already developed, include a copy of the relevant sections with your program.
 - vi. How you will ensure the long-term operation and maintenance (O&M) of your selected BMPs. Options to help ensure that future O&M responsibilities are clearly identified include an agreement between you and another party such as the post-development landowners or regional authorities.
 - vii. Who is responsible for overall management and implementation of your post-construction SWMP and, if different, who is responsible for each of the BMPs identified for this program.
 - viii. How you will evaluate the success of this minimum measure, including how you selected the measurable goals for each of the BMPs.
- f. *Performance Standards.* Your post-construction SWMP shall include a pre-construction storm water pollution prevention plan review of all projects from construction activities that result in a land disturbance of greater than or equal to one acre to ensure that required controls are designed per requirements. These applicable sites shall be inspected to ensure that controls are installed per requirements. Your program shall also ensure that long-term operation and maintenance (O&M) plans are developed and agreements in place for all applicable sites.

- g. Annual Reporting. Your annual reports shall document the following: (1) number of applicable sites in your jurisdiction requiring post-construction controls, (2) number of pre-construction storm water pollution prevention plan reviews performed, (3) number of inspections performed to ensure as built per requirements, and (4) number of long-term operation and maintenance (O&M) plans developed and agreements in place.

6. Pollution Prevention/Good Housekeeping for Municipal Operations

- a. You shall develop and implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations; and
- b. Using training materials that are available from Ohio EPA or other organizations, your program shall include employee training to prevent and reduce storm water pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and storm water system maintenance; and
- c. You shall include a list of industrial facilities you own or operate that are subject to Ohio EPA' Industrial Storm Water General Permit or individual NPDES permits for discharges of storm water associated with industrial activity that ultimately discharge to your MS4. Include the Ohio permit number or a copy of the Industrial NOI form for each facility. For your municipal facilities that conduct activities described in 40 CFR 122.26(b)(14) that are not required to obtain Industrial Storm Water General Permit coverage, including vehicle maintenance facilities, bus terminals, composting facilities, impoundment lots and waste transfer stations, a Storm Water Pollution Prevention Plan (SWP3) shall be developed and implemented in accordance with the SWP3 requirements of Ohio EPA's Industrial Storm Water General Permit (OHR000005).
- d. Decision process. You shall document your decision process for the development of a pollution prevention/good housekeeping program for municipal operations. Your rationale statement shall address both your overall pollution prevention/good housekeeping program and the individual BMPs, measurable goals, and responsible persons for your program. The rationale statement shall include the following information, at a minimum:
- i. Your operation and maintenance program to prevent or reduce pollutant runoff from your municipal operations. Your program shall specifically list the municipal operations that are impacted by this operation and maintenance program.
 - ii. Any government employee training program you will use to prevent and reduce storm water pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and storm water system maintenance. Describe any existing, available materials you plan to use. Describe how this training program will be coordinated with the outreach programs developed for the public information minimum measure and the illicit discharge minimum measure.
 - iii. Your program description shall specifically address the following areas:
 1. Maintenance activities, maintenance schedules, and long-term inspection procedures for controls to reduce floatables and other pollutants to your MS4.
 2. Controls for reducing or eliminating the discharge of pollutants from streets, roads, highways, municipal parking lots, maintenance and storage yards, waste transfer stations, fleet or maintenance shops with outdoor storage areas, and salt/sand storage locations and snow disposal areas you operate. A description of the materials used for roadway and municipal parking lot winterization (use of salt, sand, bottom ash, etc. or combination thereof), associated application rates, and

the rationale for the selected application rates shall be included. Also identify controls or practices to be used for reducing or eliminating discharges of pollutants resulting from roadway and municipal parking lot winterization activities.

3. Procedures for the proper disposal of waste removed from your MS4 and your municipal operations, including dredge spoil, accumulated sediments, floatables, and other debris.
4. 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.
- iv. Who is responsible for overall management and implementation of your pollution prevention/good housekeeping program and, if different, who is responsible for each of the BMPs identified for this program.
- v. How you will evaluate the success of this minimum measure, including how you selected the measurable goals for each of the BMPs.
- e. *Performance Standards.* Your pollution prevention/good housekeeping program shall include, at a minimum, an annual employee training. Your operation and maintenance program shall include appropriate documented procedures, controls, maintenance schedules and recordkeeping to address Part III.B.6.d.iii of this permit.
- f. *Annual Reporting.* Your annual reports shall document the following: (1) summary of employee training program(s) implemented with number of employees that attended and (2) summary of activities and procedures implemented for your operation and maintenance program.

C. Sharing Responsibility

Implementation of one or more of the minimum measures may be shared with another entity, or the entity may fully take over the measure. You may rely on another entity only if:

1. The other entity, in fact, implements all or part of the control measure;
2. The particular control measure, or component of that measure, is at least as stringent as the corresponding permit requirement; and
3. The other entity agrees to implement the control measure on your behalf. There shall be written acceptance of this obligation. This obligation shall be maintained as part of your SWMP. If the other entity agrees to report on the minimum measure, you shall supply the other entity with the reporting requirements contained in Part IV.C of this permit. If the other entity fails to implement the control measure on your behalf, then you remain liable for any discharges due to that failure to implement.

D. Reviewing and Updating Storm Water Management Programs

1. **SWMP Review:** You shall do an annual review of your SWMP in conjunction with preparation of the annual report required under Part IV.C of this permit.
2. **SWMP Update:** You may change your SWMP during the life of the permit in accordance with the following procedures:
 - a. Changes adding (but not subtracting or replacing) components, controls, or requirements to the SWMP may be made at any time upon written notification to Ohio EPA.

- b. Changes replacing an ineffective or infeasible BMP specifically identified in the SWMP with an alternate BMP may be requested at any time. Unless denied by Ohio EPA, changes proposed in accordance with the criteria below shall be deemed approved and may be implemented 60 days from submittal of the request. If the request is denied, Ohio EPA will send you a written response giving a reason for the decision. Your modification requests shall include the following:
 - i. An analysis of why the BMP is ineffective or infeasible (including cost prohibitive),
 - ii. Expectations on the effectiveness of the replacement BMP, and
 - iii. An analysis of why the replacement BMP is expected to achieve the goals of the BMP to be replaced.
 - c. Change requests or notifications shall be made in writing and signed in accordance with Part V.G of this permit.
3. SWMP Updates Required by Ohio EPA: Ohio EPA may require changes to the SWMP as needed to:
- a. Address impacts on receiving water quality caused, or contributed to, by discharges from the MS4;
 - b. Include more stringent requirements necessary to comply with new Federal statutory or regulatory requirements; or
 - c. Include such other conditions deemed necessary by Ohio EPA to comply with the goals and requirements of ORC 6111 and the Clean Water Act.
 - d. Changes requested by Ohio EPA will be made in writing, set forth the time schedule for you to develop the changes, and offer you the opportunity to propose alternative program changes to meet the objective of the requested modification. All changes required by Ohio EPA will be made in accordance with Ohio Administrative Code (OAC) 3745-47.
4. Transfer of Ownership, Operational Authority, or Responsibility for SWMP Implementation: You shall implement the SWMP on all new areas added to your portion of the MS4 (or for which you become responsible for implementation of storm water quality controls) as expeditiously as practicable, but not later than one year from addition of the new areas. Implementation may be accomplished in a phased manner to allow additional time for controls that cannot be implemented immediately. An exception to this one year timeframe exists for requirements associated with the comprehensive storm sewer system map and dry-weather screening of storm water outfalls. If you will be unable to complete these requirements within one year from the addition of the new areas, you shall provide an alternative schedule to complete with the following annual report.
- a. Within 90 days of a transfer of ownership, operational authority, or responsibility for SWMP implementation, you shall have a plan for implementing your SWMP on all affected areas. The plan may include schedules for implementation. Information on all new annexed areas and any resulting updates required to the SWMP shall be included in the annual report.
 - b. Only those portions of the SWMPs specifically required as permit conditions shall be subject to modification. Addition of components, controls, or requirements by the permittee(s) and replacement of an ineffective or infeasible BMP implementing a required component of the SWMP with an alternate BMP expected to achieve the goals of the original BMP shall be considered minor changes to the SWMP and not modifications to the permit.

PART IV. EVALUATING, RECORD KEEPING AND REPORTING

A. Evaluating

1. You shall evaluate program compliance, the appropriateness of identified BMPs, and progress toward achieving identified measurable goals and satisfying performance standards.

B. Record Keeping

1. You shall retain copies of all reports required by this permit, a copy of the NPDES permit, and records of all data used to complete the NOI application for this permit, for a period of at least three years from the date of the report or application, or for the term of this permit, whichever is longer. This period may be extended by request of Ohio EPA at any time.
2. You shall submit your records to Ohio EPA only when specifically asked to do so. You shall retain the SWMP required by this permit (including a copy of the permit language) at a location accessible to Ohio EPA. You shall make your records, including the NOI, annual reports and the SWMP, available to the public if requested to do so in writing.

C. Reporting

You shall submit annual reports to the director by the first day of April for each year that this permit is in effect. If you had coverage under the previous version of this permit you shall submit your 2014 annual report by April 1, 2015. Each report shall cover the period from January through December of the previous year. You shall use the Annual Report Form provided by the Director or you may request approval to use your own reporting format. The report shall include:

1. A most recent Table of Organization for program development and implementation, including a primary point of contact with contact information;
2. The status of your compliance with permit conditions and performance standards, an assessment of the appropriateness of the identified BMPs, progress toward achieving the statutory goal of reducing the discharge of pollutants to the MEP, and the measurable goals for each of the minimum control measures. The report shall also include a summary of the specific annual reporting requirements identified for each minimum control measure in Part III.B.1.d, Part III.B.2.d, Part III.B.3.k, Part III.B.4.d, Part III.B.5.g and Part III.B.6.f;
3. Results of information collected and analyzed, if any, during the reporting period, including monitoring data used to assess the success of the program at reducing the discharge of pollutants to the MEP;
4. A summary of the storm water activities you plan to undertake during the next reporting cycle (including an implementation schedule);
5. Proposed changes to your SWMP, including changes to any BMPs or any identified measurable goals that apply to the program elements;
6. Identify and summarize any variances granted under your storm water program regulations and requirements.

PART V. STANDARD PERMIT CONDITIONS

A. Duty to Comply

You shall comply with all conditions of this permit. Any permit noncompliance constitutes a violation of ORC 6111 and is grounds for enforcement action.

Ohio law imposes penalties and fines for persons who knowingly make false statements or knowingly swear or affirm the truth of a false statement previously made.

B. Continuation of the Expired General Permit

An expired general permit continues in force and effect until a new general permit is issued.

C. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for you in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

D. Duty to Mitigate

You shall take all reasonable steps to minimize or prevent any discharge in violation of this permit which has a reasonable likelihood of adversely affecting human health or the environment.

E. Duty to Provide Information

You shall furnish to the director, within seven days or as indicated in the written request, any information which the director may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. You shall also furnish to the director upon request copies of records required to be kept by this permit.

F. Other Information

If you become aware that you failed to submit any relevant facts or submitted incorrect information in the NOI, SWMP, or in any other report to the director, you shall promptly submit such facts or information.

G. Signatory Requirements

All NOIs, SWMPs, reports, certifications or information submitted to the director shall be signed.

1. These items shall be signed as follows:

- a. For a corporation: By a responsible corporate officer. For the purpose of this section, a responsible corporate officer means:
 - i. A president, secretary, treasurer or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation; or
 - ii. The manager of one or more manufacturing, production or operating facilities, provided, the manager is authorized to make management decisions which govern the operation of the regulated facility including having the explicit or implicit duty of making major capital investment recommendations, and initiating and directing other comprehensive measures to assure long-term environmental compliance with environmental laws and regulations; the manager can assure that the necessary systems are established or actions taken to gather complete and accurate information for permit application requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures;
- b. For a partnership or sole proprietorship: By a general partner or the proprietor, respectively; or
- c. For a municipality, State, Federal or other public agency; by either a principal executive officer or ranking elected official. For purposes of this section, a principal executive officer of a Federal agency includes: (1) the chief executive officer of the agency, or (2) a senior

executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., Regional Administrators of U.S. EPA).

2. All reports required by the permits and other information requested by the director shall be signed by a person described in Part V.G.1 of this permit or by a duly authorized representative of that person. A person is a duly authorized representative only if:
 - a. The authorization is made in writing by a person described in Part V.G.1 of this permit and submitted to the director;
 - b. The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity, such as the position of plant manager, operator of a well or well field, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the company. (A duly authorized representative may thus be either a named individual or any individual occupying a named position); and
 - c. The written authorization is submitted to the director.
3. *Changes to authorization.* If an authorization under Part V.G.2 of this permit is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, a new authorization satisfying the requirements of Part V.G.2 of this permit must be submitted to director prior to or together with any reports, information or applications to be signed by an authorized representative.
4. *Certification.* Any person signing documents under Parts V.G.1 or V.G.2 of this permit shall make the following certification:

"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, 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."
5. *Falsification.* Ohio law imposes penalties and fines for persons who knowingly make false statements or knowingly swear or affirm the truth of a false statement previously made.

H. Property Rights

The issuance of this permit does not convey any property rights of any sort, nor any exclusive privilege, nor does it authorize any injury to private property nor any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations.

I. Proper Operation and Maintenance

You shall, at all times, properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by you to achieve compliance with the conditions of this permit and with the conditions of your SWMP. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. Proper operation and maintenance requires the operation of backup or auxiliary facilities or similar systems, installed by you only when the operation is necessary to achieve compliance with the conditions of this permit.

J. Inspection and Entry

You shall allow Ohio EPA or an authorized representative upon the presentation of credentials and other documents as may be required by law, to do any of the following:

1. Enter your premises at reasonable times where a regulated facility or activity is located or conducted or where records must be kept under the conditions of this permit;
2. Have access to and copy at reasonable times, any records that must be kept under the conditions of this permit;
3. Inspect at reasonable times any facilities or equipment (including monitoring and control equipment) practices, or operations regulated or required under this permit; and
4. Sample or monitor at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the Clean Water Act, any substances or parameters at any location.

K. Permit Actions

This permit may be modified, revoked and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition.

L. Permit Transfers

Permit transfers shall be in accordance with OAC 3745-38-02(K).

M. Anticipated Noncompliance

You shall give advance notice to Ohio EPA of any planned changes in the permitted small MS4 or activity which may result in noncompliance with this permit.

N. State Environmental Laws

No condition of this permit shall release you from any responsibility or requirements under other environmental statutes or regulations.

O. Severability

The provisions of this permit are severable, and if any provision of this permit or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

P. Procedures for Modification or Revocation

Permit modification or revocation will be conducted in accordance with OAC Chapter 3745-38.

Q. Requiring an Individual Permit or an Alternative General Permit

1. *Request by permitting authority.* Ohio EPA may require any person authorized by this permit to apply for and/or obtain either an individual NPDES permit or coverage under an alternative NPDES general permit. Any interested person may petition Ohio EPA to take action under this paragraph. Where Ohio EPA requires you to apply for an individual NPDES permit or coverage under an alternative NPDES general permit, Ohio EPA will notify you in writing that a permit application is required. This notification shall include a brief statement of the reasons for this decision, an application form, a statement setting a deadline for you to file the application, and a statement that

on the effective date of issuance or denial of the individual NPDES permit or the alternative NPDES general permit coverage as it applies to the individual permittee, coverage under this general permit shall automatically terminate. Ohio EPA may grant additional time to submit the application upon request of the applicant. If you fail to submit in a timely manner an individual NPDES permit application or an NOI for coverage under an alternative NPDES general permit as required by Ohio EPA under this paragraph, then the applicability of this permit to you is automatically terminated at the end of the day specified by Ohio EPA for application submittal.

2. *Request by permittee.* Any discharger authorized by this permit may request to be excluded from the coverage of this permit by applying for an individual permit. In such cases, you must submit an individual application in accordance with the requirements of OAC Chapter 3745-33, with reasons supporting the request, to Ohio EPA. The request may be granted by issuance of any individual permit or an alternative general permit if the reasons cited by you are adequate to support the request.
3. *General permit termination.* When an individual NPDES permit is issued to a discharger otherwise subject to this permit, or you are authorized to discharge under an alternative NPDES general permit, the applicability of this permit to the MS4 is automatically terminated on the effective date of the individual permit or the date of authorization of coverage under the alternative general permit, whichever the case may be. When an individual NPDES permit is denied to an operator otherwise subject to this permit, or the operator is denied for coverage under an alternative NPDES general permit, the applicability of this permit to the MS4 is automatically terminated on the date of such denial, unless otherwise specified by Ohio EPA.

R. Oil and Hazardous Substance Liability

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities or penalties to which the permittee is or may be subject under section 311 of the CWA or 40 CFR Part 112. 40 CFR Part 112 establishes procedures, methods and equipment and other requirements for equipment to prevent the discharge of oil from non-transportation-related onshore and offshore facilities into or upon the navigable surface waters of the state or adjoining shorelines.

S. Duty to Reapply

If the permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the permittee must apply for and obtain a new permit.

T. Bypass

The provisions of 40 CFR Section 122.41(m), relating to "Bypass," are specifically incorporated herein by reference in their entirety. For definition of "Bypass," see Part VI.

U. Upset

The provisions of 40 CFR Section 122.41(n), relating to "Upset," are specifically incorporated herein by reference in their entirety. For definition of "Upset," see Part VI.

V. Monitoring and Records

The provisions of 40 CFR Section 122.41(j), relating to "Monitoring and Records," are specifically incorporated herein by reference in their entirety.

W. Reporting Requirements

The provisions of 40 CFR Section 122.41(i), relating to "Reporting Requirements," are specifically incorporated herein by reference in their entirety.

PART VI. DEFINITIONS

All definitions contained in Section 502 of the Act and 40 CFR 122 shall apply to this permit and are incorporated herein by reference. For convenience, simplified explanations of some regulatory/statutory definitions have been provided, but in the event of a conflict, the definition found in the Statute or Regulation takes precedence.

Please see the following web site for Federal and State laws related to Ohio EPA's Division of Surface Water: <http://epa.ohio.gov/dsw/dswrules.aspx>.

Please see the following web site for Storm Water Program forms and other guidance documents associated with this general permit: <http://epa.ohio.gov/dsw/storm/index.aspx>.

Best Management Practices (BMPs) means schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to prevent or reduce the pollution of surface waters of the state. BMPs also include treatment requirements, operating procedures, and practices to control runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage. For guidance, please see U.S. EPA's National Menu of BMPs at <http://water.epa.gov/polwaste/npdes/swbmp/index.cfm>.

Bypass means the intentional diversion of waste streams from any portion of a treatment facility.

Control Measure, as used in this permit, refers to any Best Management Practice or other method used to prevent or reduce the discharge of pollutants to surface waters of the state.

CWA or The Act means the Clean Water Act (formerly referred to as the Federal Water Pollution Control Act or Federal Water Pollution Control Act Amendments of 1972) Pub.L. 92-500, as amended Pub. L. 95-217, Pub. L. 95-576, Pub. L. 96-483 and Pub. L. 97-117, 33 U.S.C. 1251 et. seq.

Director means the director of the Ohio Environmental Protection Agency.

Discharge, when used without a qualifier, refers to "discharge of a pollutant" as defined at 40 CFR 122.2.

Green Infrastructure means wet weather management approaches and technologies that utilize, enhance or mimic the natural hydrologic cycle processes of infiltration, evapotranspiration and reuse. For guidance, please see <http://water.epa.gov/infrastructure/greeninfrastructure/>.

Illicit Connection means any man-made conveyance connecting an illicit discharge directly to a municipal separate storm sewer.

Illicit Discharge is defined at 40 CFR 122.26(b)(2) and refers to any discharge to a municipal separate storm sewer that is not entirely composed of storm water, except discharges authorized under an NPDES permit (other than the NPDES permit for discharges from the MS4) and discharges resulting from fire-fighting activities.

Large MS4 means all municipal separate storm sewer systems that are located in an incorporated place with a population of two hundred fifty thousand or more as determined by the 1990 census by the United States bureau of census.

Larger Common Plan of Development or Sale means a contiguous area where multiple separate and distinct construction activities may be taking place at different times on different schedules under one plan.

Medium MS4 means all municipal separate storm sewer systems that are located in an incorporated place with a population of one hundred thousand or more, but less than two hundred fifty thousand as determined by the 1990 census by the United States bureau of census.

MEP is an acronym for "Maximum Extent Practicable," the technology-based discharge standard for Municipal Separate Storm Sewer Systems to reduce pollutants in storm water discharges that was

established by CWA §402(p). A discussion of MEP as it applies to small MS4s is found at 40 CFR 122.34.

MS4 means municipal separate storm sewer system which means a conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains) that are:

- Owned or operated by the federal government, state, municipality, township, county, district, or other public body (created by or pursuant to state or federal law) including special district under state law such as a sewer district, flood control district or drainage districts, or similar entity, or a designated and approved management agency under section 208 of the act that discharges into surface waters of the state; and
- Designed or used for collecting or conveying solely storm water,
- Which is not a combined sewer, and
- Which is not a part of a publicly owned treatment works.

NOI is an acronym for "Notice of Intent" which means the mechanism used to "register" for coverage under a general permit.

Non-traditional MS4 means systems similar to separate storm sewer systems in municipalities, such as systems at military bases, hospitals, public universities or prison complexes, and highways and other thoroughfares. The term does not include separate storm sewer systems in very discrete areas such as individual buildings.

Off-Lot Home Sewage Treatment System (HSTS) means a system designed to treat home sewage on-site and discharges treated wastewater off-lot.

Ohio EPA means the Ohio Environmental Protection Agency.

On-Lot Home Sewage Treatment System (HSTS) means a system designed to treat home sewage on-lot with no discharges leaving the lot.

Outfall from an MS4 means a point source at the point where a municipal separate storm sewer discharges to surface waters of the state and does not include open conveyances connecting two municipal separate storm sewers, or pipes, tunnels or other conveyances that connect segments of the same stream or other surface waters of the state and are used to convey waters of the state.

Small MS4 means all municipal separate storm sewer systems that are neither a large MS4 nor a medium MS4.

Storm Water is defined at 40 CFR 122.26(b)(13) and means storm water runoff, snow melt runoff, and surface runoff and drainage.

Storm Water Management Program (SWMP) refers to a comprehensive program to manage the quality of storm water discharged from the municipal separate storm sewer system.

Surface Waters of the state means all streams, lakes, reservoirs, ponds, marshes, wetlands, or other waterways which are situated wholly or partly within the boundaries of the state, except those private waters which do not combine or affect a junction with a surface water. Waters defined as sewerage systems, treatment works, or disposal systems in Section 6111.01 of the ORC are not included.

SWMP is an acronym for "Storm Water Management Program."

Upset means an exceptional incident in which there is unintentional and temporary noncompliance with technology based permit effluent limitations because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent caused by operational error, improperly

designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.

"You" and "Your" as used in this permit is intended to refer to the permittee, the operator, or the discharger as the context indicates and that party's responsibilities (e.g., the city, the village, the county, the township, the flood control district, the university, etc).

Appendix 2:
Letter from Ohio EPA to City of Canton granting approval under Ohio EPA NPDES
General Permit OHQ000003



COPY

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

12/2/2014

CITY OF CANTON
WILLIAM BARTOS
218 CLEVELAND AVE SW
CANTON

OH 44702

RE: Approval for coverage under Ohio EPA NPDES General Permit OHQ000003
STORM WATER ASSOCIATED WITH SMALL MUNICIPAL SEPARATE STORM SEWER SYSTEMS (MS4)

Dear Applicant:

The Ohio Environmental Protection Agency has received a Notice of Intent for coverage under the above referenced general permit for :

CITY OF CANTON
2436 30TH ST NE (CITY SERVICE CTR)

Ohio EPA Facility Permit Number: 3GQ00072*CG

This site/facility is approved for coverage under the above referenced Ohio EPA general permit. Please use your Ohio EPA facility permit number in all future correspondences.

Please familiarize yourself with your general permit. The permit contains requirements and prohibitions with which you must comply. Coverage remains in effect until a renewal general permit is issued and Ohio EPA has contacted you in writing about submitting a new NOI for continuing coverage.

For Coal Surface Mining Permittees enclosed are Monthly Operating Report (MOR) forms for your use.

Program contacts:

Anthony Robinson MS4 / Industrial
Mike Joseph Construction
Jason Fyffe MS4 /Marina / Alt.Const

You may obtain current information and forms from our web site at:

<http://www.epa.ohio.gov/dsw/storm/stormform.asp>

Thank you for your cooperation in this matter.

Sincerely,

Craig W. Butler
Director

