Storm Water Management Plan
And
2013 Annual Report

Permit No. OHQ000002: Authorization for Small Municipal Separate Storm Sewer Systems to Discharge Storm Water under the National Pollutant Discharge Elimination System

Submitted To:
Ohio Environmental Protection Agency

Prepared By:
Ohio Department of Transportation &
CDM Smith Inc.

March 14, 2014
To: Becky Humphreys
From: John Herchl

Organization/ Address: Ohio Department of Transportation
Date: March 14, 2014

Mail Stop 5220
1980 West Broad Street
Columbus, Ohio 43223

Re: 2013 SWMP Annual Report

Job #: PID 76488 – Agreement 16696 – Contract Stage CDM-13-13-04

Via: Mail: Overnight: Courier: Hand Delivery

Enclosed please find:

For your information

For your review

For your signature

Approved

Approved as noted

Returned to you for correction

Message:

Please find attached two (4) copies of the 2013 SWMP Annual Report in both print and digital format.

Thank you,

John Herchl

Signed
Certification Statement

"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

__________________________________________

Name: Jerry Wray
Title: Director, Ohio Department of Transportation
Phone: 614-466-2336
Date: ____________________
Section 1
Introduction

1.1 Introduction

The Ohio Department of Transportation (ODOT) was granted coverage by the Ohio Environmental Protection Agency (OEPA) on March 19, 2003 under NPDES Permit No. OHQ000001 - Authorization for Small Municipal Separate Storm Sewer Systems (MS4) to Discharge Storm Water under the National Pollutant Discharge Elimination System (NPDES). To satisfy the requirements of ODOT’s MS4 permit, protect water quality, and reduce or eliminate the discharge of pollutants to the maximum extent practicable (MEP), ODOT developed and continues to implement and enforce a Storm Water Management Program (SWMP). ODOT’s SWMP includes policies, procedures, operations and management practices, pollution control techniques, activities and standard drawings/specifications. The goal of the program is to address the permit requirements to the MEP while allowing ODOT to continue to deliver projects, protect the traveling public, and continue to discharge storm water runoff from their owner-operated storm sewer system.

This Annual Report documents ODOT's 2013 SWMP activities, the proposed program activities for 2014, and the following requirements of Section IV-C (Reports) of ODOT’s NPDES Permit:

- Status of ODOT’s compliance with permit requirements and performance standards,
- Assessment of the appropriateness and effectiveness of Best Management Practices (BMPs) initiated by ODOT to comply with permit requirements and performance standards,
- Progress towards achieving the statutory goal of reducing the discharge of pollutants to the Maximum Extent Practicable (MEP),
- Identification and reporting on program implementation activities in support of measurable goals and performance standards for each minimum control measure (MCM) and BMPs, and
- Reporting on annual program implementation activities (i.e., Best Management Practices (BMPs)) that address the identified reporting metrics presented in the permit.

1.2 Overview of ODOT's Storm Water Management Program

Since its inception in 2003, ODOT's SWMP has institutionalized many of its storm water management BMPs through development of new or revised procedures, specifications, programs, and standard practices. As a state agency and defined by OEPA, ODOT is a non-traditional MS4. Consequently, the target audiences for ODOT's SWMP consist of ODOT employees, consultants, contractors, and facility users. Because ODOT's Public interacts with ODOT through continual revisions and updates to policies, manuals, and specifications as a part of their regular daily work routines, these institutionalized mechanisms (aka BMPs) form the basis of ODOT’s SWMP. Supplemental Specification 832 (SS 832), ODOT’s Location and Design Manual, Volume 2 (L&D Vol. 2), and ODOT’s Bridge Design Manual are the primary, contractually-binding mechanisms ODOT uses to ensure project designs, inspection requirements, and other MS4 permit performance standards are incorporated at the project level and ODOT's policies continue to be implemented and enforced.
Appendix A presents the evolution of ODOT's storm water management program best management practices first documented in ODOT's 2003 SWMP Report. ODOT understands the MS4 permit requirements to not “eliminate” BMPs from the program and therefore took steps beginning with the 2009 Annual Report to document BMP changes and mergers to formalize the institutionalization of program BMPs. Based on review and assessment, this process has allowed ODOT to change some BMPs to facilitate more effective implementation approaches, simplify reporting, and increase involvement of responsible parties. In other cases, ODOT has merged and/or redefined BMPs as the program matures, measurable goals are reached, and the BMPs are fully implemented. Section 2.7 of this report discusses significant program modifications, challenges or issues encountered and/or resolved for 2013.

1.2.1 Organization

Part IV.C.1 of ODOT's MS4 permit requires annual submission of revised or updated organizational charts associated with significant organizational changes. In 2011, the storm water program was moved from the Office of Environmental Services, Planning Division to the Engineering Division, Office of Hydraulic Engineering. Appendix B presents ODOT's current table of organization. During 2013 ODOTs storm water management program was still led out of the Office of Hydraulic Engineering.

Part III. A.1.d of ODOT's MS4 permit requires the SWMP to include a table of organization that shows how implementation across multiple positions, districts, offices, and departments will occur. ODOT's SWMP unifies a cross section of ODOT offices and programs, such as training, project planning, design, construction, operations and maintenance, and facilities management, with a common focus on roadway storm water management and water quality issues.

1.2.2 ODOT's MS4 Regulated Area

Although ODOT continues to implement most storm water program BMPs statewide, the MS4 regulated area is delineated using ODOT's normalized storm water management boundary. ODOT's original 2003 MS4 regulated area was determined by using the "urbanized area" boundaries obtained from the 2000 US census, which is the method described in the MS4 permit. In 2004, ODOT adopted the use of its "normalized urban areas" to define its MS4 regulated urbanized areas for cities listed in Appendix 6 of the USEPA Phase II Storm Water Rules. Also in 2004, ODOT incorporated cities listed in Appendix 7 of the USEPA Phase II Storm Water Regulations into the MS4 normalized urban area boundaries. ODOT's "normalized urban areas" were created for project funding purposes and they were selected because mechanisms are already in place to produce and routinely update mapping of these “normalized urbanized area” boundaries. As Table 1-1 shows, the use of normalized urban areas results in a moderate increase of the amount of roadways and facilities subject to MS4 permit requirements.
Table 1-1 2013 Summary of ODOT's MS4 Regulated Area

<table>
<thead>
<tr>
<th>ODOT Normalized Area Boundary Categories</th>
<th>MS4 Regulated Area required by permit</th>
<th>MS4 Regulated Area used by ODOT</th>
</tr>
</thead>
<tbody>
<tr>
<td>Census Bureau Urban Area Boundaries</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>ODOT Normalized Urban Area Boundaries</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Appendix 7 Areas</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>MS4 Regulated Right of Way miles (Updated February 2004)</td>
<td>1,541</td>
<td>1930</td>
</tr>
<tr>
<td>Number of MS4 Regulated number of Facilities (Updated February 2004)</td>
<td>60</td>
<td>97</td>
</tr>
<tr>
<td>Total Square Miles of MS4 Regulated Area</td>
<td>45.66</td>
<td>61.39</td>
</tr>
</tbody>
</table>

Appendix C includes maps of ODOT's MS4 regulated “normalized urbanized area", statewide and by district. Table 1-2 provides a detailed breakdown of road mileage and number of facilities within ODOT's MS4 regulated area by road classification and facility type.

Table 1-2 2013 Summary of ODOT's MS4 Regulated Area by ODOT District

<table>
<thead>
<tr>
<th>ODOT District</th>
<th>Road Mileage*</th>
<th>Number of Facilities</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Interstates</td>
<td>US Routes</td>
</tr>
<tr>
<td>1</td>
<td>15.15</td>
<td>0.00</td>
</tr>
<tr>
<td>2</td>
<td>56.060</td>
<td>20.55</td>
</tr>
<tr>
<td>3</td>
<td>32.54</td>
<td>38.24</td>
</tr>
<tr>
<td>4</td>
<td>121.06</td>
<td>45.15</td>
</tr>
<tr>
<td>5</td>
<td>10.54</td>
<td>8.40</td>
</tr>
<tr>
<td>6</td>
<td>118.93</td>
<td>632.80</td>
</tr>
<tr>
<td>7</td>
<td>81.49</td>
<td>20.46</td>
</tr>
<tr>
<td>8</td>
<td>151.31</td>
<td>71.94</td>
</tr>
<tr>
<td>9</td>
<td>0.00</td>
<td>19.13</td>
</tr>
<tr>
<td>10</td>
<td>3.35</td>
<td>1.56</td>
</tr>
<tr>
<td>11</td>
<td>11.02</td>
<td>21.65</td>
</tr>
<tr>
<td>12</td>
<td>137.10</td>
<td>37.20</td>
</tr>
<tr>
<td>Total</td>
<td>736.09</td>
<td>317.08</td>
</tr>
</tbody>
</table>

Note: (1) These tables include mileage and facilities in ODOT normalized urban areas and Appendix 7 cities. (2) No changes in the regulated area size or facility numbers were documented in 2013. *Mileage last updated in 2006 with the addition of the Appendix 7 communities.

1.2.3 Additional Laws and Regulations Affecting ODOT

ODOT's activities are regulated under a variety of state and national/federal environmental laws and regulations, many of which pre-date the SWMP. As described and summarized in Table 1-3, compliance with many of these regulations provides direct and indirect water quality benefits. Many ODOT manuals, such as the ODOT Project Development Process Manual (http://www.dot.state.oh.us/projects/pdp/Pages/default.aspx), were designed to direct staff, consultants and contractors to comply with environmental regulatory requirements during planning, construction, operation and maintenance of Ohio's transportation network.
<table>
<thead>
<tr>
<th>Regulation</th>
<th>Water Quality Perspective</th>
<th>Coordinating Agency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Clean Water Act, as amended</td>
<td>Procedures and requirements for NPDES storm water and wastewater (402) permits, Construction General Permit, Alternative Construction General Permits, 401/404 permits, Total Maximum Daily Load Program (TMDL)</td>
<td>USACE, USEPA, OEPA</td>
</tr>
<tr>
<td>Clean Water Act – as amended</td>
<td>Section 303 (d) Total Maximum Daily Load</td>
<td>USEPA, OEPA</td>
</tr>
<tr>
<td>Coastal Zone Management Act of 1972</td>
<td>Preservation, protection, development, and restoration and enhancement of resources in the coastal zone</td>
<td>NOAA</td>
</tr>
<tr>
<td>Comprehensive Environmental Response, Compensation, and Liability Act of 1980</td>
<td>Provides liability, compensation, cleanup, and emergency response for hazardous substances</td>
<td>USEPA, OEPA</td>
</tr>
<tr>
<td>Department of Transportation Act, Section 4(f)</td>
<td>Preservation of publicly owned parklands and waterfowl and wildlife refuges</td>
<td>FHWA</td>
</tr>
<tr>
<td>Fish and Wildlife Coordination Act</td>
<td>Conservation, maintenance, and management of wildlife resources</td>
<td>USFWS, ODNR</td>
</tr>
<tr>
<td>Food Security Act of 1985</td>
<td>Wetland conservation provisions on agricultural farmland</td>
<td>NRCS</td>
</tr>
<tr>
<td>Home Sewer Treatment System – NPDES permit</td>
<td>Requires permits to discharge on lot sewer treatment systems to surface waters</td>
<td>OEPA</td>
</tr>
<tr>
<td>Hydro-demolition NPDES Permit</td>
<td>Requires control and management of slurry runoff from the process of wet cutting concrete</td>
<td>OEPA</td>
</tr>
<tr>
<td>National Environmental Policy Act of 1969</td>
<td>Consideration and documentation of all environmental impacts</td>
<td>Federal, State, and local agencies</td>
</tr>
<tr>
<td>Ohio Coastal Management Act of 1998</td>
<td>Proper management of Ohio’s coastal resources</td>
<td>ODNR</td>
</tr>
<tr>
<td>Ohio Revised Code Chapter 6111</td>
<td>Water pollution control, NPDES permits, isolated wetland permits, 401 Water Quality Certifications</td>
<td>OEPA</td>
</tr>
<tr>
<td>Ohio Wild, Scenic, and Recreational River Act</td>
<td>Preservation and protection of certain rivers</td>
<td>ODNR</td>
</tr>
<tr>
<td>Rivers and Harbors Act of 1899</td>
<td>Protection of navigable waters through Section 9/10 permits</td>
<td>USACE, USCG</td>
</tr>
<tr>
<td>Safe Drinking Water Act</td>
<td>Protection of surface and groundwater resources used for public drinking water supplies</td>
<td>USEPA, OEPA, local agencies</td>
</tr>
<tr>
<td>Wild &amp; Scenic Rivers Act, Section 7</td>
<td>Preservation and protection of certain rivers</td>
<td>NPS</td>
</tr>
</tbody>
</table>
Section 2
Permit Requirement and Best Management Practice (BMP) Tables

Ohio EPA issued the second term MS4 permit in January 2009 (Appendix D contains a copy of the MS4 Permit). As a result, the Ohio Department of Transportation (ODOT) updated and revised their annual reporting structure and format as part of the 2009 Annual Report submitted April 1, 2010. ODOT's updated reporting format includes tables that document ODOT's activities and measurable goals for the reporting year, and provide information on proposed activities and measurable goals for the coming year. This reporting format modified the Ohio EPA's 2009 "Annual Report Template" to more effectively address and report on ODOT's annual program elements. The 2013 Annual Report follows the same format used for the 2009 Storm Water Management Annual Report. Each of the Minimum Control Measures (MCMs) in Section 2 is organized as follows:

- **OEPA Permit Requirements** – The regulatory permit language is shown in italics. The permit language has been modified to be ODOT-specific by replacing references to "you" with "ODOT." ODOT's compliance response, rationale, and activities are documented below each permit requirement.

- **Best Management Practice (BMP) Tables** – The BMP tables provide information on ODOT's BMP measurable goals and implementation activities for the previous year (2012) along with information on the current year's (2013) proposed measurable goals and program activities/practices.

ODOT's Annual Report format addresses OEPA's required reporting elements and demonstrates that ODOT has implemented activities, programs, policies, and/or procedures to address MS4 permit requirements. Section 2.7 provides an overview of any significant report changes, BMP changes, and/or organizational changes made during 2012.

### 2.1 Minimum Control Measure 1 - Public Education and Outreach

#### 2.1.1 MCM 1: MS4 OEPA Permit Requirements/ODOT SWMP Activity

Regulatory permit language below is shown as italicized and the ODOT program responses are shown in plain text. The permit language has been modified to be ODOT-specific.

*Part III.B.1.a.*

*ODOT shall implement a public education program to distribute educational materials to the community (defined as ODOT's Statewide Public, and consisting of ODOT employees, ODOT consultants, ODOT contractors, and ODOT facility or system users) 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, ODOT is only required to provide educational materials and outreach to ODOT’s Statewide Public.**

ODOT’s Statewide Public education program is focused on ODOT’s Statewide Public:

- Employees,
- Consultants,
- Contractors, and
- Facility users

Educational materials and themes center on highway or transportation storm water management and water quality issues, challenges, practices and concepts. ODOT provides this information through various mechanisms including continual revisions and updates to policies, manuals, specifications, and websites, as well as internal and external training sessions led by ODOT.

**Part III.B.1.b.**

ODOT’s Storm Water Management Program’s (SWMP) decision process includes the following information:

1. **How ODOT plans to inform ODOT’s Statewide Public about the steps they can take to reduce storm water pollution.**

   ODOT's program activities provide storm water and water quality information through various mechanisms. For employees, consultants, and contractors these include continual revisions and updates to policies, manuals, specifications, and websites, as well as internal and external training. Additionally, ODOT provides storm water information to facility users through signage and posters in public areas and at ODOT Rest Areas and through the use of storm grate stamping. Given these examples of how "ODOT’s Statewide Public" interacts with ODOT through these methods as a part of their regular activities, ODOT has found this method of communication to be effective in informing ODOT's Statewide Public about the steps, actions or activities they can implement to reduce storm water pollution.

2. **How ODOT plans to inform ODOT’s Statewide Public on how to become involved in the storm water program (with activities such as local stream and beach restoration activities).**

   ODOT's program activities provide storm water and water quality information through various mechanisms. For employees, consultants, and contractors these include continual revisions and updates to policies, manuals, specifications, and department websites, as well as opportunities for internal and external training. In addition, ODOT provides storm water information to facility users through signage and posters in public areas and ODOT Rest Areas and storm grate stamping. As ODOT’s Statewide Public interacts with ODOT through these methods as a part of their regular activities, this method of involvement is effective in informing ODOT’s Statewide Public about the steps they can take to reduce storm water pollution.
3. **Who are the target audiences for ODOT's education program who are likely to have significant storm water impacts (including commercial, industrial and institutional entities) and why those target audiences were selected?**

As a non-traditional MS4, the target audiences for ODOT are collectively termed ODOT's Statewide Public and include employees (i.e., good housekeeping and pollution prevention BMPs), contractors (i.e., temporary erosion and sediment control BMPs), consultants (i.e., post-construction water quality control BMPs) and to a limited degree the travelling public (Facility users).

4. **What are the target pollutant sources ODOT's Statewide Public education program is designed to address?**

ODOT's targeted pollutant sources include typical roadway system pollutants collected and conveyed in runoff from ODOT's linear transportation network, facilities and construction projects.

5. **What is the outreach strategy, including the mechanisms (e.g., printed brochures, newspapers, media, workshops, etc.) ODOT will use to reach ODOT's target audiences, and how many people does ODOT expect to reach with ODOT's outreach strategy over the permit term.**

ODOT's outreach strategy consists of performing the activities identified in BMPs 1.1, 1.2, 1.3, 1.4 and 1.5 (Section 2.1.2). These program activities and mechanisms are developed to reach 100% of portions of ODOT’s Statewide Public (employees, consultants, and contractors) through policies, manuals, specifications, and websites and a lesser percentage of facility users.

6. **Who (person or department) is responsible for overall management and implementation of ODOT's storm water public education and outreach program and, if different, who is responsible for each of the BMPs identified for this program.**

The program BMP tables include information on the ODOT parties responsible for BMP implementation and reporting. Overall program management is the responsibility of the Office of Hydraulic Engineering. ODOT’s organization and primary storm water program contact are included in Appendix B.

7. **How will ODOT evaluate the success of this minimum measure, including how ODOT selected the measurable goals for each of the BMPs?**

The BMP table includes information associated with BMP appropriateness and/or effectiveness. On an annual basis, the ODOT offices responsible for the various BMP activities participate in program information collection meetings that evaluate program activities, assess and discuss the effectiveness of each BMP, and update or revise measurable goals and activities for the upcoming program year.

**Part III.B.1.c. Performance Standards**

*ODOT’s 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*
At a minimum, at least one theme or message shall be targeted to the development community. ODOT’s storm water public education and outreach program shall reach at least 50 percent of ODOT’s Statewide Public over the permit term.

ODOT’s program activities include continual revisions and updates to policies, manuals, specifications, procedures and websites, as well as internal and external training. ODOT also evaluates necessary revisions or updates to printed material and website publications that to some extent address storm water management and water quality. Because ODOT's Statewide Public interacts with ODOT through these methods as a part of their regular activities, this method of communication is effective. The permit requires the identification of storm water themes:

2013 Themes and Mechanisms – ODOT uses a number of mechanisms that include development of policies, manuals, specifications, websites, and training, will continue to reach out and educate its Public on issues related to storm water and water quality. ODOT's "Themes" are envisioned to include:

- Maintaining ODOT's Post-construction BMPs – Ensures long term performance of Post-Construction BMPs. This theme includes information on location, operations and maintenance of post-construction storm water controls.
- Installation of Post-construction BMPs – Ensures post-construction BMPs are appropriately selected, located, designed and constructed.
- Identification of potential illicit discharges – ODOT's webpage includes an illicit discharge report button for ODOT staff and an illicit discharge “1-800” number for public use.
- Assessing mechanism to ensure ODOTs public is educated and knowledgeable on current BMPs, technologies, research and trends – The SWMP maintains continuous communication with inter department administration to ensure ODOT’ policies, manuals and specifications continue to be effective.

ODOT's annual report identifies each mechanism used, including each storm water theme, audience targeted, and estimate of how many people were reached by each mechanism.

The Annual Report provides BMPs and information that address this permit requirement.

2.1.2 Public Education and Outreach BMP Tables

The BMP Tables, 1.1, 1.2, 1.3, 1.4, and 1.5 contain implementation information associated with public education and outreach activities and measurable goals.
### BMP Table 1-1

<table>
<thead>
<tr>
<th>Office Responsible for BMP Implementation</th>
<th>Publications</th>
<th>Relevant Permit Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>All Central Office Departments</td>
<td></td>
<td>Part III.B.1.a (p. 6): Provide educational materials and outreach activities about the impact of storm water discharges on water bodies and steps to reduce pollutants in storm water runoff.</td>
</tr>
</tbody>
</table>

**Decision Rationale:** ODOT uses publications that include policies, manuals and specifications as the mechanisms to provide public education and outreach to ODOT's public. The intent of these mechanisms is to convey water quality themes to a large percentage of ODOT's public. These mechanisms also serve a larger population statewide that utilizes ODOT publications for minimum quality standards.

### 2013 Annual Report Information and Status

#### BMP Measurable Goals

- Continue to reach out to ODOT's Statewide Public through the use of the mechanisms identified below.
- Ensure that ODOT's publications maintain consistent and current themes.
- Include ODOT's Statewide Public in development of publications.

#### 2013 Annual Program Activities or Results

- **Mechanism:** Construction and Material Specifications (CMS), Standard Construction Drawings (SCD) and Standard Operating Procedures (SOP) Manuals – CMS was updated in January 2013 and the SCD was also updated in 2013.
  - **Themes, Messages, and Results:** CMS and SOP include specifications and procedures for controlling pollutants associated with project construction.
  - **Target Audience:** ODOT employees, contractors, consultants and local public entity that uses ODOT's publications.

- **Mechanism:** Maintenance Operations Manual (MOM) – No MOM changes in 2013.
  - **Themes, Messages, and Results:** The MOM is a compilation of procedures, protocol, and directives regarding ODOT's maintenance and operation activities intended as a set of guidelines for the District and County work forces. The MOM works cooperatively with ODOT's CMS and other manuals to document maintenance procedures impacting water quality such as ODOT maintenance projects, inspection and long term maintenance of drainage infrastructure, vegetation management, and snow and ice removal.
  - **Target Audience:** ODOT employees, contractors, consultants.

- **Mechanism:** Location and Design Manual, Volume 2 (L&D Vol. 2) – L&D Vol. 2 was updated in 2013.
  - **Themes, Messages, and Results:** L&D Vol. 2 has been prepared by the Office of Hydraulic Engineering as a guide for the hydraulic design of highway drainage infrastructure including post-construction BMPs.
  - **Target Audience:** ODOT employees, consultants and local public entity that uses ODOT's publications.

- **Mechanism:** Hazardous Waste Management Manual – No HWMM changes in 2013.
  - **Themes, Messages, and Results:** This document establishes ODOT’s hazardous waste and waste management policies and procedures Department wide.
  - **Target Audience:** ODOT employees, contractors, consultants.
### 1.1 Publications

**Mechanism:** Right-of-Way (R/W) Use Permit policy

**Themes, Messages, and Results:** Director Policy 22-A documents procedures for accepting and maintaining control of hydraulic connections to ODOT’s right-of-way.

**Target Audience:** ODOT employees, contractors, consultants and Statewide public.

**Mechanism:** Signage and Posters

**Themes, Messages, and Results:** Signage and poster themes include messages such as “Only Rain Goes Down the Drain”, reporting illicit discharges and general educational messages for ODOT’s Statewide Public.

**Target Audience:** ODOT employees, contractors, consultants, and facility users.

<table>
<thead>
<tr>
<th>Effective?</th>
<th>Yes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Notes: ODOT reaches a large percentage of their public and a significant number of Statewide public. All members of ODOT’s Statewide Public are required to abide by the most current versions of the publications and mechanisms identified above.</td>
<td></td>
</tr>
</tbody>
</table>

### 2014 Program Information

#### BMP Measurable Goals

- Continue to reach out to ODOT’s Statewide Public through the use of the mechanisms identified above.
- Ensure that ODOT’s publications are maintained, current and the themes and mechanisms are at a minimum evaluated and assessed annually.
- Include ODOT’s public in development of publications.

#### 2014 Proposed Activities

- Continue to update and implement ODOT’s mechanisms.
- The SWMP will maintain communication with publication administrators to ensure current and consistent themes.
- Continue to include a mix of ODOT’s Statewide Public in development and updating of ODOT’s mechanisms and publications.
**BMP Table 1-2**

<table>
<thead>
<tr>
<th>1.2 Storm Drain Grate Stamping</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Office Responsible for BMP Implementation</strong></td>
</tr>
<tr>
<td>Hydraulic Engineering</td>
</tr>
</tbody>
</table>

**Decision Rationale:** ODOT has incorporated pollution prevention/public education messages such as, "DUMP NO WASTE" and "DRAINS TO WATERWAY" onto ODOT storm drain grates per ODOT design specifications and standard drawings.

<table>
<thead>
<tr>
<th>2013 Annual Report Information and Status</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>BMP Measurable Goals</strong></td>
</tr>
<tr>
<td><strong>Summary of 2013 Program Activities or Results</strong></td>
</tr>
<tr>
<td><strong>Target Audience:</strong> Statewide public.</td>
</tr>
</tbody>
</table>

| Effective? | Yes |
| Notes: The water quality message reaches a diverse statewide public audience. |

<table>
<thead>
<tr>
<th>2014 Program Information</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>BMP Measurable Goals</strong></td>
</tr>
<tr>
<td><strong>2014 Proposed Activities</strong></td>
</tr>
</tbody>
</table>
### BMP Table 1-3

<table>
<thead>
<tr>
<th>1.3</th>
<th>Storm Water Management Program (SWMP) Website</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Office Responsible for BMP Implementation</strong></td>
<td>Relevant Permit Requirements</td>
</tr>
<tr>
<td>Communications/Hydraulic Engineering</td>
<td>Part III.B.1.a (p. 6): Provide educational materials and outreach activities about the impact of storm water discharges on water bodies and steps to reduce pollutants in storm water runoff.</td>
</tr>
</tbody>
</table>

**Decision Rationale:** The website has the potential to convey current Program information to a statewide audience.

### 2013 Annual Report Information and Status

**BMP Measurable Goals**
Website – Provides a central location to convey Storm Water Management Program content and current information.

**Summary of 2013 Program Activities or Results**
Storm Water Management Program Website
The webpage is continually updated to convey current storm water program information.

**Target Audience:** Statewide public.

**Effective?** Yes

**Notes:** Webpage conveys current Program messages to a diverse statewide public.

### 2014 Program Information

**BMP Measurable Goals**
Website – Maintain a central location to convey Storm Water Management Program content and current information.

**2014 Proposed Activities**
Update webpage content to include updated or revised ODOT storm water management program information and activities.
BMP Table 1-4

<table>
<thead>
<tr>
<th>1.4</th>
<th>Internal Training</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Office Responsible for BMP Implementation</strong></td>
<td><strong>Relevant Permit Requirements</strong></td>
</tr>
<tr>
<td>All Departments</td>
<td>Part III.B.1.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.</td>
</tr>
</tbody>
</table>

**Decision Rationale:** ODOT maintains an extensive internal training program that continuously educates ODOT employees on all aspects of being a public employee. Utilizing existing training program organization is an efficient manner to convey Storm Water Management Program messages and track measurable goals. Updating internal training sessions is an effective way to maintain SWMP involvement of ODOT’s employee public.

**2013 Annual Report Information and Status**

<table>
<thead>
<tr>
<th>BMP Measurable Goals</th>
<th>Convey SWMP messages to ODOT’s employees.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Quantify ODOT’s Statewide Public that receives training for specific messages (i.e., employees, consultant and contractors).</td>
</tr>
</tbody>
</table>

**Summary of 2013 Program Activities or Results**

| ODOT Training Sessions held. See Appendix E for complete list of training titles and attendance figures. |
| The SWMP maintains involvement with internal central office staff on selected training sessions to ensure a specific water quality message. See Appendix E for complete list of training titles and attendance figures. |
| The SWMP provides technical information associated with storm water management for policy and project level compliance strategies or responses. This resource is offered to all of ODOT’s employee public. |
| Several training session modules were updated during 2013. Appendix E identifies those which were changed or updated in some way to address storm water management or water quality. |

**Effective?** Marginal

**Notes:** The intent of this BMP is effective provided that it enables a potential change in behavior to reduce pollutants.

**2014 Program Information**

<table>
<thead>
<tr>
<th>BMP Measurable Goals</th>
<th>Convey SWMP messages to ODOT’s employee public.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Quantify ODOT’s employee public that receives training for specific themes, messages or procedures that incorporates storm water or water quality information, concepts or procedures.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>2014 Proposed Activities</th>
<th>Continue to train and educate ODOT employees through water quality messages.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>SWMP shall continue to be a technical resource and a leader in compliance efforts for the Department.</td>
</tr>
<tr>
<td></td>
<td>SWMP shall continue to be updated and developed to document revisions to storm water and water quality training sessions and materials.</td>
</tr>
</tbody>
</table>
BMP Table 1-5

<table>
<thead>
<tr>
<th>Office Responsible for BMP Implementation</th>
<th>Relevant Permit Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>LTAP/Maintenance Administration/ Construction Administration/ Environmental Services/ Hydraulic Engineering</td>
<td>Part III.B.1.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.</td>
</tr>
</tbody>
</table>

**Decision Rationale:** ODOT maintains external training to educate ODOT’s Statewide Public, beyond employees, on appropriate implementation and use of ODOT’s publications and BMPs. These training activities have potential to reach Statewide Public.

### 2013 Annual Report Information and Status

**BMP Measurable Goals**

- Provide training to ODOT’s external public that utilizes ODOT’s publications.
- Maintain educational leadership role through external training to Statewide public.

**Summary of 2013 Program Activities or Results**

- ODOT Staff continues to lead sessions, training and workshops that include water quality among other varied topics. See Appendix E.
- Local Technical Assistance Program (LTAP)
- LTAP provided BMP training for erosion and sediment control, salt management, good housekeeping for municipal facilities, and operations.
- **Target Audience:** ODOT employees, contractors, consultants and Statewide public.

<table>
<thead>
<tr>
<th>Effective?</th>
<th>Marginal</th>
</tr>
</thead>
<tbody>
<tr>
<td>Notes:</td>
<td>The intent of this BMP is effective provided that it enables a potential change in behavior to reduce pollutants.</td>
</tr>
</tbody>
</table>

### 2014 Program Information

**BMP Measurable Goals**

- Provide training to ODOT’s external public that utilizes ODOT’s publications.
- Maintain educational leadership role through external training led by ODOT for their Statewide public.

**2014 Proposed Activities**

- Continue to provide external training on using ODOT’s publications.
- The SWMP will continue to monitor and track external training sessions and content and provide technical guidance.
- The SWMP will continue to partner with other storm water leaders to expand educational outreach to a Statewide public.
2.2 Minimum Control Measure 2 – Public Involvement and Participation

2.2.1 MCM 2: MS4 OEPA Permit Requirements/ODOT SWMP Activity

Regulatory permit language below is shown as italicized and the ODOT program responses are shown in plain text. The permit language has been modified to be ODOT-specific.

Part III.B.2.a.

*ODOT 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., ODOT, universities, hospitals, prisons, military bases, and other government complexes), ODOT is required to involve ODOT’s Public (i.e., ODOT employees, ODOT consultants, ODOT contractors, and ODOT facility or system users).*

ODOT’s storm water management program continues to explore new and efficient ways to involve our public. Due to the “non-traditional” nature of ODOT’s MS4 public participation and involvement strategies used to obtain involvement may vary from the traditional MS4 communities in order to provide more effective impacts on improving water quality throughout the state. ODOT’s program includes a variety of BMPs intended to reach the following audiences:

- **ODOT Employees** – Internal training, internal document/publications (specifications, manuals and policies), and program website. Program initiatives involving multiple Divisions within ODOT provide feedback and involvement as part of Program development and implementation.

- **ODOT Consultants and Contractors** – ODOT involves its public through workgroup committees that provide recommendations for updating ODOT’s specifications, manuals and policies that relate to the MS4 permit requirements. Contractors and consultants are a focused portion of ODOT’s Statewide Public that we provide external training to in order to encourage open dialog for Program development and improvement. These public involvement activities extend beyond maintaining or achieving compliance with the MS4 Permit.

- **System and facility Users** – Storm Water Website information, information posted at travel plazas and rest areas and informational signage.

- **Storm Water Community** – ODOT works and partners with Federal, State and local storm water groups to develop and promote programs, education and initiatives that extend public involvement beyond ODOT’s MS4 permitted boundaries.

Part III.B.2.b.

*The information presented in this permit section addresses program decisions associated with ODOT’s storm water management program. ODOT has documented program decision processes for the development of ODOT’s storm water management program. ODOT’s storm water management program decision process includes the following information:*

1. *Has ODOT involved the Public in the development and submittal of ODOT's NOI and SWMP description?*
As a non-traditional MS4 entity, ODOT continues to involve ODOT’s Statewide Public regarding storm water management permit requirements, as well as program issues, regulatory requirements and reporting, and changes at both the programmatic and project levels.

2. **What is ODOT’s plan to actively involve ODOT’s Statewide Public in the development and implementation of ODOT’s program?**

As a non-traditional MS4 entity, ODOT continues to involve internal offices and departments by providing a central location for permit compliance support. Support is provided through an open communication network and closely working with offices to solve project and policy related MS4 compliance issues. The SWMP continuously works with all related offices and personnel to increase communication and awareness pertaining to compliance initiatives.

- Internal and external training workshops, conferences and Quarterly Assessment Reports (QARs) are one example of actively involving office and district personnel in program development and involvement. Feedback obtained during these training sessions helps the SWMP understand how the Program should evolve and how to prioritize program initiatives that provide the most benefit to water quality.

- Annual MS4 program meetings are held with Office Administrators in ODOT’s Central Office to discuss Department program initiatives that are affected by the MS4 permit, identify previous year changes and identify upcoming program activities.

- The SWMP reviews and comments on specifications, manuals and policies as changes are made or new publications are developed.

- ODOT’s SWMP connects and partners with Federal, State and local community storm water agencies, organizations, workshops, seminars and training opportunities. This outreach actively provides connection with water quality leaders and regulators.

- ODOT implements beautification programs that involve many communities and organizations. These programs are outside the responsibilities of the SWMP, but benefits improved water quality through public involvement.

- ODOT has actively involved our public and affected stakeholders through addressing and meeting all project level environmental commitments as outlined by the National Environmental Policy Act (NEPA) process. These involvements that occur on the project or district levels are difficult to separate or individualize water quality activities and typically include news releases, public meetings and signage.

3. **Who are the target audiences for ODOT’s Statewide Public involvement program, including a description of the types of ethnic and economic groups engaged? ODOT is 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.**

ODOT’s target audiences that constitute ODOT’s Statewide Public, includes ODOT employees, ODOT consultants, ODOT contractors, and facility or system users. Due to the
non-traditional status, ODOT maintains flexibility to involve stakeholders by many avenues that are not present to the traditional MS4 entities as well as the traditional involvement methods. ODOT has actively involved our public and affected stakeholders through meeting all environmental commitments as outlined by the National Environmental Policy Act (NEPA) process. These involvements that occur on the project or district levels are difficult to separate or individualize water quality activities and may include news releases, public meetings and signage.

4. **What are the types of public involvement activities included in ODOT’s 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.**

- As a non-traditional MS4 entity, ODOT continues to involve internal offices and departments by providing a central location for permit compliance support. Support is provided through an open communication network and closely working with offices to solve project and policy related compliance issues. The SWMP continuously works with all related offices and personnel to increase communication pertaining to compliance initiatives.

- Internal and external training workshops, conferences and QAR's are examples of actively involving office and district personnel in program development. Feedback obtained during these training sessions help the SWMP understand how the Program should evolve and how to prioritize program initiatives that provide the most benefit to water quality.

- Annual meetings are held with Office Administrators in ODOT’s Central Office to discuss Department initiatives that are impacted by the MS4 permit and to identify previous year changes.

- The SWMP involves reviews and comments on specifications, manuals and policies as changes are made or new publications are developed.

- The SWMP plays an active role in State and local community storm water workshops and training opportunities. This outreach actively provides connection with water quality leaders and regulators.

- ODOT implements beautification programs that involve many communities and organizations. These programs are outside the responsibilities of the SWMP, but attempt to improve water quality through public involvement.

- ODOT has actively involved our public and affected stakeholders through meeting all environmental commitments as outlined by the National Environmental Policy Act process. These involvements that occur on the project or district levels are difficult to separate the water quality activities and may include news releases, public meetings and signage.
Section 2 • Permit Requirement and Best Management Practice (BMP) Tables

5. **Who (person or department) is responsible for the overall management and implementation of ODOT's storm water public involvement/participation program and, if different, who is responsible for each of the BMPs identified for this program.**

Each BMP table includes information on the responsible ODOT parties. Overall, program management is the responsibility of the Office of Hydraulic Engineering. However, all Divisions within ODOT have responsibilities associated with MS4 permit compliance. ODOT updated the department’s storm water program organizational structure and the revised organizational chart can be viewed in Appendix B.

6. **How ODOT will evaluate the success of this minimum measure, including how ODOT selected the measurable goals for each of the BMPs.**

The BMP tables include information associated with assessment of the BMP’s success. As a non-traditional entity, ODOT maintains flexibility to evaluate effectiveness of BMP performance and to evolve as behaviors change and our public evolves, and as departmental needs change.

**Part III.B.2.c. Performance Standards**

**ODOT’s storm water public involvement/participation program shall include, at a minimum, five public involvement activities over the permit term.**

ODOT's storm water management program continues to explore new ways to involve our public. Due to the “non-traditional” nature of ODOT’s MS4 public, strategies used to obtain involvement may vary from the traditional MS4 communities in order to provide the most impact on improving water quality throughout the state. The following are some examples of how the SWMP involves ODOT’s Statewide Public, but does not constitute a comprehensive all inclusive list.

- Specification, Design Manuals, Policy Updates – Specifications, design manuals and policies are continuously updated to address new permit requirements or storm water quality improvement practices. The process for updating these publications does involve portions of ODOT's Statewide Public as appropriate for the intended user (i.e., the Ohio Contractors Association (OCA) is involved in the development and update of ODOT's construction specifications). Supplemental Specification (SS) 832 requires contract responsibilities for implementing temporary erosion and sediment control and Construction General Permit compliance activities. Therefore, both the contractor public and employee public are involved in MCM 4. Similarly, as design manuals and policies are developed or changed, other portions of ODOT's Statewide Public become involved.

- Storm Water Management Program Website – Continue to provide updated storm water information that is accessible to the public.

- Roadside Litter/Beautification Programs – Keep America Beautiful (KAB), Adopt-a-Highway.

- Internal and External Training and Professional Workshops/Seminars – The SWMP plays an active role in State and local community storm water workshops and training opportunities. This outreach actively provides connection with water quality leaders and regulators throughout the state. Internal and external training workshops, conferences and QAR’s are one example of actively involving office and district personnel in program development. Feedback
obtained during these training sessions helps the SWMP understand how the Program should evolve and how to prioritize program initiatives that provide the most benefit to water quality.

- Program Meetings – Annual meetings are held with Office Administrators in ODOT’s Central Office to discuss Department initiatives that are impacted by the MS4 permit and to identify previous year changes. As a non-traditional MS4 entity, ODOT continues to involve internal offices by providing a central location for permit compliance support. Support is provided through an open communication network and closely working with offices to solve project and policy related compliance issues. The SWMP continuously works with all related offices and personnel to increase communication pertaining to compliance initiatives.

- ODOT continues to use QARs as the primary method for addressing and ensuring good housekeeping activities at Facilities to ensure compliance with multiple environmental permits.

**Part III.B.2.d. Annual Report**

*ODOT's annual report identifies each public involvement/participation activity conducted, including a brief description of activity and includes an estimate of how many people participated.*

Refer to BMP tables and Appendix sections for a detailed report of ODOT’s Statewide Public involvement/participation activities performed. ODOT’s annual report identifies each public involvement/participation activity conducted, including a brief description of activity and an estimate of how many people participated.

**2.2.2 Public Involvement and Participation BMP Tables**

The BMP Tables 2-1 and 2-2 contain implementation information associated with training and public involvement activities and measurable goals.
**BMP Table 2-1**

<table>
<thead>
<tr>
<th>2.1</th>
<th>Public Participation through LTAP, Committees, Partnering, and Internal and External Training</th>
</tr>
</thead>
<tbody>
<tr>
<td>Office Responsible for BMP Implementation</td>
<td>Relevant Permit Requirements</td>
</tr>
<tr>
<td>LTAP/Maintenance Administration/ Construction Administration/ Environmental Services/ Hydraulic Engineering</td>
<td>Part III.B.2.a: ODOT shall develop and implement a public involvement/participation program that focuses on ODOT employees, on-site contractors, and system users.</td>
</tr>
</tbody>
</table>

**Decision Rationale:** ODOT is a leader in providing internal and external training that connects ODOT’s Statewide Public. These training activities are directed to provide participation to ODOT’s Statewide Public. ODOT uses public feedback to update publications, training materials and program initiatives.

### 2013 Annual Report Information and Status

<table>
<thead>
<tr>
<th>BMP Measurable Goals</th>
<th>Activities or Results</th>
</tr>
</thead>
<tbody>
<tr>
<td>Provide training to ODOT’s external public that encourages public involvement.</td>
<td>ODOT Staff continues to lead sessions, training and workshops that include water quality among other varied topics. See Appendix E.</td>
</tr>
<tr>
<td>Maintain educational leadership role through external training to Statewide public.</td>
<td>Participated in regional and national transportation organization events – AASHTO Subcommittees, Transportation Research Board, Lake Erie Commission, Ohio Water Resource Council and Ohio Stormwater Association – Transportation subcommittee.</td>
</tr>
</tbody>
</table>

**Effective?** Yes

**Notes:** The ability for ODOT to successfully implement specifications is dependent upon active public involvement and participation. Maintaining up-to-date publications and the use of these publications by ODOT’s public continues to provide evidence that this BMP remains effective.

### 2014 Program Information

<table>
<thead>
<tr>
<th>BMP Measurable Goals</th>
<th>2014 Proposed Activities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Provide training to ODOT’s external public that encourages public involvement.</td>
<td>Continue to provide internal and external training and involve the public.</td>
</tr>
<tr>
<td>Maintain educational outreach leadership role through external training to Statewide public.</td>
<td></td>
</tr>
</tbody>
</table>

ODOT Storm Water Management Program

Annual Report – 2013
### Section 2 • Permit Requirement and Best Management Practice (BMP) Tables

#### BMP Table 2-2

<table>
<thead>
<tr>
<th>Office Responsible for BMP Implementation</th>
<th>Relevant Permit Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Maintenance Administration/Hydraulic Engineering</td>
<td>Part III.B.6.a (p. 13): ODOT shall develop and implement a public involvement/participation program that focuses on ODOT employees, on-site contractors and system users.</td>
</tr>
</tbody>
</table>

**Decision Rationale:** Beautification programs are an effective means of generating public involvement that provide immediate water quality benefits.

#### 2013 Annual Report Information and Status

<table>
<thead>
<tr>
<th>BMP Measurable Goals</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Document groups/partners participating in highway clean up and beautification programs.</td>
<td></td>
</tr>
<tr>
<td>Promote ODOT participation in beautification programs that provide water quality benefit.</td>
<td></td>
</tr>
</tbody>
</table>

**Summary of 2013 Program Activities or Results**

- Adopt-a-Highway participants – Estimated at 15,000 volunteers statewide.
- Memorandum of Agreement with the Ohio Department of Rehabilitation and Correction (ODRC) was finalized in 2013 to formalize an inmate litter pick-up program. An on-line form has been developed to track collected litter collected by the ODRC program.
- Participated as a partner with KOB’s “Kick Butt” program.
- ODOT continued to participate on the Keep Ohio Beautiful (KOB) board, which is affiliated with Keep America Beautiful. ODOT participants attend the bi-monthly meetings that are held at ODOT. ODOT partners with KOB on the State Roadway Cleanup event each year and participate in KOB’s annual meetings. Appendix F includes information on volume of trash collected.

**Effective?** Yes

**Notes:** This BMP indicates effectiveness through a large number of public participants and offers benefits to water quality through trash and litter removal.

#### 2014 Program Information

<table>
<thead>
<tr>
<th>BMP Measurable Goals</th>
<th></th>
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</thead>
<tbody>
<tr>
<td>Continue to document groups/partners participating in highway clean up and beautification programs.</td>
<td></td>
</tr>
<tr>
<td>Continue to promote ODOT participation in beautification programs that provide water quality benefits.</td>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>2014 Proposed Activities</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Continue to participate and document program activities and involvement.</td>
<td></td>
</tr>
</tbody>
</table>
2.3 Minimum Control Measure 3 – Illicit Discharge Detection and Elimination

2.3.1 MCM 3: MS4 OEPA Permit Requirements/ODOT SWMP Activity

Regulatory permit language below is shown as italicized and the ODOT program responses are shown in plain text. The permit language has been modified to be ODOT-specific.

Part III.B.3.a.

*ODOT shall develop, implement and enforce a program to detect and eliminate illicit discharges, as defined in Part VI of this permit, into ODOT’s small MS4 (for illicit discharges to ODOT's MS4 via an adjacent, outside of ODOT's jurisdiction, interconnected MS4, ODOT is only required to inform the neighboring MS4 and Ohio EPA in ODOT's annual report submission, of their existence);*

ODOT is continuously developing its statewide illicit discharge detection and elimination (IDDE) program through a combination of the following activities:

- Outfall Inventory Database
- Outfall dry weather screening and follow up
- District records locates the storm sewer systems and home sewer treatment systems outfall locations through the right-of-way use permits.
- Right-of-way use permitting
- Illicit Discharge Detection Procedures
- Updates performed on the database and database upload capabilities

Part III.B.3.b.

*ODOT 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. Within five years of when ODOT’s coverage under this general permit was granted, ODOT’s comprehensive storm sewer system map shall also include ODOT's MS4 system (owned and/or operated by ODOT), 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 ODOT's local post-construction water quality BMP requirements. If ODOT will be unable to develop ODOT's comprehensive storm sewer system map during this permit term, ODOT shall provide an alternative schedule to complete with ODOT's 2009 Annual Report.*

Traditional municipal based storm sewer system mapping is not practical for ODOT's non-traditional MS4 regulated storm sewer system as indicated in the BMP description. In lieu of traditional mapping for ODOT’s storm sewer system, ODOT maintains practical detailed knowledge of their system through the following approach:
ODOT's system is divided into 12 Districts and has storm sewer system information on file in each district.

All new construction projects are developed, implemented and managed at the District level. Construction plans are kept on file with each District in multiple formats. Old project plans have been scanned and are kept on record with the District if possible. All new construction plans are recorded in digital format for reference.

Upon request to view a specific area of ODOT's storm sewer system, the District can provide details through the use of construction plans specific to the segments or areas of interest. Typical construction plans provide inlet location, culverts, bridges, roadside ditches, and storm pipe connectivity with urban drainage systems that ODOT systems discharge into or ODOT systems that receive flow from municipal systems and surface drainage patterns.

For new construction projects, base mapping is created with computer aided design software in universal coordinate systems. Districts maintain the computer aided files and possess the software necessary to view, assess, modify and maintain the storm sewer system map as necessary to verifying degrees of detail.

ODOT's outfall inventory is guided by the MS4 Storm Water Outfall Inventory Manual, dated August 2005. This manual was scheduled to be updated in 2012.

ODOT maintains a MS4 Outfall Inventory Database, which includes records of field inspections with pertinent data and photos of each outfall within ODOT's MS4 regulated area. ODOT maintains a web-based database which allows internal and external users to search, query, and upload records for all outfalls within ODOT's MS4 regulated area, serving as the primary record keeping mechanism for ODOT's outfalls. In 2010, this database was updated to allow for additional user features that included dry weather screening information and revisions to the user interface application that allowed the end user more options. ODOT's procedure for maintaining and updating the database is as follows:

- ODOT's current approach is to work with a consultant to perform an update of the statewide outfall inventory of storm water discharges to waters of the state. ODOT recognizes that their storm sewer system is dynamic in that new outfalls are created and existing outfalls may be abandoned based on project needs and drainage design requirements. ODOT is completing follow-up on their dry weather screening and outfall mapping through a consultant. When finished, ODOT will be able to interact with the map that will have data associated with each outfall location. This map system will be updated on a regular basis.

- Each location within the ODOT MS4 right-of-way, where a pipe or drainage ditch outfalls to a water of the state, is identified and recorded in ODOT's outfall inventory database.

- Each location has a follow-up investigation that identifies a dry-weather flow occurrence. The flow is prioritized by high, medium, or low designation based on presences of flow, odor, color, and turbidity.

- Where dry-weather flows are present and a suspected illicit discharge is indicated, ODOT attempts to track the location of the source discharge entering the right-of-way.

- ODOT's Right-of-Way (R/W) permits are the initial step in the process to allow discharges into the R/W. The process that is launched when an illicit discharge is detected includes contacting
local Health Departments and Ohio EPA via letters indicating the location of the potential illicit discharge.

- Follow-up to the notifications will occur as needed on an annual basis and ODOT maintains follow up information/correspondence.

ODOT currently uses ArcMap (GIS application) to plot the location of storm sewer system outfalls that are cross referenced with the Outfall inventory database. Project planning - analyze existing and proposed project drainage needs. ODOT assessed project drainage needs include proper storm sewer system pipe sizing, connection to existing drainage networks, removing and replacing failed existing drainage, and addressing any identified illicit discharges or connections during project planning, design, and construction.

**Part III.B.3.c.i-ii**

*Within five years of when ODOT's initial Small MS4 general permit coverage was granted, ODOT shall submit the following to Ohio EPA:*

i. A list of all on-site sewage disposal systems connected to discharge to ODOT's MS4 (a.k.a. home sewage treatment systems (HSTSs)) including the addresses;

ii. A storm sewer map showing the location of all HSTSs connected to ODOT's MS4. This map shall include details on the type and size of conduits/ditches in ODOT's MS4 that receive discharges from HSTSs, as well as the water bodies receiving the discharges from ODOT's MS4.

Because ODOT's statewide storm sewer system is complex and provides significant challenges to comprehensively map, ODOT utilizes a right-of-way permit process to identify permitted HSTS discharges as well as driveway pipes and municipal outlets as applicable; this does not cover field or drain tile discharge into ODOT's right-of-way. The permit application requires any applicant to provide a complete description of the outfall (i.e., size of pipe), a clean, clear effluent, and a signed OEPA permit for discharge of HSTS. ODOT maintains the right-of-way permit process as follows:

1. Each ODOT District accepts and reviews applications for new storm water discharges into the R/W or HSTS releases into the right-of-way. The permit application lists the location, size, and type of discharge.

2. ODOT does not allow any connections of HSTSs to the right-of-way without appropriate letters from the local Health Department and the appropriate EPA NPDES permit.

3. Permits may be disallowed if application does not meet ODOT's Right-of-Way permit requirements.

4. If granted, Districts keep the R/W permits on record in an accessible manner. The number of permits approved is reported to the Office of Environmental Services (OES) on a yearly basis by each District.

5. If a problem is discovered with an existing HSTS connection to the right-of-way, the permit can be referenced and used to forward to the local Health Department for notification.
Part III.B 3.d.

ODOT shall to the extent allowable under State or local law, effectively prohibit, through ordinance, or other regulatory mechanism, illicit discharges into ODOT’s storm sewer system and implement appropriate enforcement procedures and actions;

ODOT utilized the Right-of-way Use Permitting process to prohibit illicit discharges into its storm sewer system.

Part III.B.3.e.

ODOT shall develop and implement a plan to detect and eliminate non-storm water discharges, including illegal dumping, to ODOT’s system. At a minimum, for household sewage treatment systems (HSTSS), ODOT’s 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 HSTSSs 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 HSTSSs are operating as designed and intended and, for those not meeting these 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 HSTSS 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 HSTSSs.
Section 2 • Permit Requirement and Best Management Practice (BMP) Tables

ODOT has no authority to approve, deny, inspect, enforce, etc. HSTS installation/repair/replacement—this is done under the auspices of local health departments. Therefore, ODOT’s position is that it will only issue a R/W permit if applicant demonstrates that they are in full compliance with local health department requirements and/or OEPA general permit requirements for HSTS. ODOT will notify these agencies if evidence revealed that HSTS has failed and follow up with these agencies and document when corrections have been made and ODOT will close the file.

Part III.B.3.f.

*ODOT shall inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste;*

ODOT continues to train employees, on-site contractors, and consultants on the hazards and enforcement mechanisms associated with illicit discharges or illicit discharging, spills and maintenance related illicit discharges within ODOT's Right-of-Way. The BMPs and supporting activities under sections 2.1.2, 2.3.2 and 2.6.2 include additional information on how ODOT informs employees, on-site contractors, consultants, and system users.

Part III.B.3.g. and h.

*g. ODOT shall address the following categories of non-storm water discharges or flows (i.e., illicit discharges) only if ODOT identifies them as significant contributors of pollutants to ODOT's 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, de-chlorinated swimming pool discharges, street wash water, and discharges or flows from fire fighting activities (by definition, not an illicit discharge).*

ODOT modified the right-of-way use permitting process in 2005 to prohibit and minimize illicit discharges and identify HSTS and/or other non-storm water discharges that are in compliance with local and state permits. ODOT's right-of-way use permit continues to be reviewed and updated annually as ODOT moves forward with implementation associated with the IDDE program. The right-of-way use permit includes appropriate revisions to the allowable/permitted non-storm water discharges to ODOT storm sewer system.

*h. ODOT 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 permittee) to be significant sources of pollutants to the MS4, because of either the nature of the discharges or conditions ODOT has established for allowing these discharges to ODOT's MS4 (e.g., a charity car wash with appropriate controls on frequency, proximity to sensitive water bodies, BMPs on the wash water, etc.). ODOT must document in ODOT's SWMP any local controls or conditions placed on the discharges. ODOT must include a provision prohibiting any individual non-storm water discharge that is determined to be contributing significant amounts of pollutants to ODOT's MS4.*

ODOT modified the right-of-way use permitting process in 2005 to prohibit illicit discharges and identify HSTS and/or other non-storm water discharges that are in compliance with local and state...
permits. ODOT has developed and implements R/W Permits as a means to control local discharges into ODOT's storm water sewer system. This is also ODOT's enforcement mechanism to manage and control discharges in their system.

Part III.B.3.i.

The information presented in this permit section addresses program decisions associated with ODOT's storm water management program. ODOT has documented program decision processes for the development of ODOT's storm water management program. ODOT's storm water management program decision process includes the following information:

i. **How ODOT 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 ODOT used for the maps, and how ODOT plans to verify the outfall locations with field surveys. If already completed, describe how ODOT developed this map. Also, describe how ODOT's map will be regularly updated.**

Traditional mapping is not practical for ODOT's non-traditional MS4 regulated storm sewer system as indicated in the BMP description. In lieu of traditional mapping for ODOT's storm sewer system, ODOT maintains practical and detailed knowledge of their system through project records, an outfall inventory database, districts plan databases and ArcMap mapping of its outfalls.

ii. **The mechanism (ordinance or other regulatory mechanism) ODOT will use to effectively prohibit illicit discharges into the MS4 and why ODOT chose that mechanism. If ODOT needs to develop this mechanism, describe ODOT's plan and a schedule to do so. If ODOT's ordinance or regulatory mechanism is already developed, include a copy of the relevant sections with ODOT's program.**

ODOT will continue to require the right-of-way use permits as the primary tool to address illicit discharges within ODOT's right-of-way.

iii. **ODOT's plan to ensure through appropriate enforcement procedures and actions that ODOT's illicit discharge ordinance (or other regulatory mechanism) is implemented.**

ODOT will continue to require the right-of-way use permits as the primary tool to address illicit discharges within ODOT's right-of-way. ODOT will continue to notify OEPA and local health districts upon illicit discharge detection and follow up on the initial notification to ensure and document that the elimination has been addressed, action taken, or completed.

iv. **ODOT's plan to detect and address illicit discharges to ODOT's system, including discharges from illegal dumping and spills. ODOT's 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. ODOT shall describe the mechanisms and strategies ODOT will implement to ensure outfalls which have previously been dry-weather screened will not have future illicit connections. ODOT's plan shall also address on-site sewage disposal systems (including failing on-lot HSTSS and off-lot discharging HSTSSs) that flow into ODOT's storm drainage system.**
For permit sub-section iv, items a-c (below), beginning in 2011, ODOT continues to use the following methods for detection of illicit discharges:

- **MS4 Outfall Inventory Dry Weather Screening Method**
  - ODOT retains consultant services to assist with identification and updating MS4 Outfall Inventory on average once every 5 years.
  - Dry-weather screenings are documented for each outfall.
  - If an illicit discharge is suspected upstream of an outlet, the dry-weather flow is tracked to the location where it enters ODOT's right-of-way. ODOT shall verify whether a Right-of-Way permit exists prior to initiating any formal written notification to the OEPA/local health officials.
  - ODOT sends a letter to the local Health Department(s) and Ohio EPA informing them of the location of suspected discharges. ODOT keeps an active file with all letters sent and responses received.
  - Follow-ups to the responses received from the Health Departments and Ohio EPA can be performed on an as needed basis and any correspondence is retained on file.

- **Illicit Discharges Identified by ODOT Employees**
  - Any time an illicit discharge is identified by an ODOT employee, the employee shall fill out the IDDE form posted and accessed through ODOT's storm water webpage.
  - Once submitted, the form sends an email to the Office of Hydraulic Engineering (OHE).
  - OHE will investigate the ODOT employee reported discharges and verify whether a Right-of-Way permit exists.
  - ODOT sends a letter to the local Health Department(s) and Ohio EPA informing them of the location of suspected discharge. ODOT keeps an active file with all letters sent and responses received.
  - Follow-ups to the responses received from the Health Departments and Ohio EPA can be performed on an as needed basis and any correspondence is retained on file.

- **Illicit Discharges Identified by the Public or others**
  - A toll-free number is listed on the ODOT storm water webpage for illegal dumping and reporting of illicit discharges.
  - If contacted by the public, OHE will investigate the request and react as appropriate.
  - In the case of an illicit discharge, ODOT sends a letter to the local Health Department and the appropriate Ohio EPA district informing them of the location of suspected discharges. ODOT keeps an active file with all letters sent and responses received.
  - Follow-ups to the responses received from the Health Departments and Ohio EPA can be performed on an as needed basis and any correspondence is retained on file.
a. **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;**

b. **Procedures for tracing the source of an illicit discharge, including the specific techniques ODOT will use to detect the location of the source;**

c. **Procedures for removing the source of the illicit discharge; and**

d. **Procedures for program evaluation and assessment.**

Items a-d are addressed through implementation of the above requirements in part B. 3.iv. and the implementation status is reported in BMP Tables 3-1 and 3-2.

v. **How does ODOT plan to inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste? Include in ODOT’s description how this plan will coordinate with ODOT’s Statewide Public education minimum measure and ODOT’s pollution prevention/good housekeeping minimum measure programs.**

ODOT continues to offer training for employees, on-site contractors, and consultants on the hazards associated with illicit discharge. The BMP tables under section 2.1.2, 2.3.2 and 2.6.2 include additional information on how ODOT informs employees, on-site contractors, and system users.

vi. **Who is responsible for overall management and implementation of ODOT’s storm water illicit discharge detection and elimination program and, if different, who is responsible for each of the BMPs identified for this program.**

Each BMP table includes information on the responsible parties. Overall program management is the responsibility of the ODOT Office of Hydraulic Engineering and the contact information is included in Appendix B.

vii. **How ODOT will evaluate the success of this minimum measure, including how ODOT selected the measurable goals for each of the BMPs.**

The BMP tables include information associated with BMP effectiveness assessments. Success of the minimum control measure is discussed at the annual meetings and through other correspondence with staff.

**Part III.B.3.j. Performance Standards**

**ODOT’s storm water illicit discharge detection and elimination program shall include or have included an initial dry-weather screening of all ODOT storm water outfalls over the permit term. ODOT’s program shall establish priorities and specific goals for long-term system-wide surveillance of ODOT’s 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. ODOT’s comprehensive storm sewer system map shall be updated annually as needed.**
ODOT’s SWMP, policies, practices, and activities have been developed to address the MCM 3 permit requirements to the maximum extent practicable (MEP). ODOT has updated and revised the BMPs under this MCM to promote more efficient implementation and reporting on BMP activities and effectiveness.

**Part III.B.3.k. Annual Reporting**

*ODOT’s 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) provide schedules for elimination of illicit connections that have been identified but have yet to be eliminated and (6) summary of any storm sewer system mapping updates.*

The Annual Report provides BMPs and information that addresses this permit requirement.

**2.3.2 Illicit Discharge Detection and Elimination BMP Tables**

The BMP Tables 3-1, 3-2 and 3-3 contain implementation information associated with illicit discharge and elimination activities and measurable goals.
### BMP Table 3-1

<table>
<thead>
<tr>
<th>3.1</th>
<th>Storm Water Outfall and Storm Sewer System Mapping</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Office Responsible for BMP Implementation</strong></td>
<td><strong>Relevant Permit Requirements</strong></td>
</tr>
<tr>
<td>Hydraulic Engineering</td>
<td>Part III.B.3.b (p. 7): 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. Within five years of when your coverage under this NPDES Permit No.: OHQ000002 general permit was granted, 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. If you will be unable to develop your comprehensive storm sewer system map during this permit term, you shall provide an alternative schedule to complete with your 2009 Annual Report.</td>
</tr>
</tbody>
</table>

**Decision Rationale:** In lieu of a standard comprehensive system map, ODOT maintains basic knowledge of our storm sewer system through outfall location mapping. Comprehensive system mapping would provide minimal water quality benefit compared to the cost of completing a comprehensive system map due to ODOT’s non-traditional status. ODOT also maintains plan databases at each District Office that contains storm system design details which offers comprehensive storm sewer system mapping.

#### 2013 Annual Report Information and Status

<table>
<thead>
<tr>
<th>BMP Measurable Goals</th>
<th>Summary of 2013 Program Activities or Results</th>
</tr>
</thead>
<tbody>
<tr>
<td>Maintain and demonstrate a basic knowledge of ODOT’s storm sewer system through outfall mapping.</td>
<td>ODOT continues to collect and update new or modified storm systems through maintaining a plan database at the appropriate District. Storm system updates are included in maintenance and operational work programs as these system changes are filed.</td>
</tr>
<tr>
<td>Maintain comprehensive system knowledge at the District level through a plan database.</td>
<td>No additional system outfalls were added to ODOT’s outfall inventory database.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Effective?</th>
<th>Notes:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>ODOT will continue to evaluate and modify ODOT’s storm sewer system and outfall mapping information as part of this BMP.</td>
</tr>
</tbody>
</table>

#### 2014 Program Information

<table>
<thead>
<tr>
<th>BMP Measurable Goals</th>
<th>2014 Proposed Activities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Maintain a basic knowledge of ODOT’s storm sewer system through outfall mapping.</td>
<td>Continue to collect and update new or modified storm systems through maintaining a plan database at the appropriate District.</td>
</tr>
<tr>
<td>Maintain comprehensive system knowledge at the District level through a plan database.</td>
<td>ODOT’s SWMP will continue to use the services of the selected consultant to update the existing outfall inventory and address dry weather flow issues.</td>
</tr>
</tbody>
</table>

ODOT’s asset management databases and culvert inventory as other methods in support of maintaining knowledge of ODOT’s storm system.
### BMP Table 3-2

**3.2**  
**Appropriate Permitting and Mapping of Non-Storm Water Discharges**

<table>
<thead>
<tr>
<th>Office Responsible for BMP Implementation</th>
<th>Relevant Permit Requirements</th>
</tr>
</thead>
</table>
| Roadway Engineering /Hydraulic Engineering | Part III.B.3.c (p. 8): Within five years of when your initial Small MS4 general permit coverage was granted, you shall submit the following to Ohio EPA:  
A list of all on-site sewage disposal systems connected to discharge to your MS4 (a.k.a. Home sewage treatment systems (HSTs)) including the addresses; and  
i. A storm sewer map showing the location of all HSTs connected to your MS4. This map shall include details on the type and size of conduits/ditches in your MS4 that receive discharges from HSTs, as well as the water bodies receiving the discharges from your MS4. |

**Decision Rationale:** ODOT regulates acceptable discharges into ODOT’s storm sewer system through issuance of right-of-way use permits. Each ODOT District manages databases of permits issued within and outside of the MS4 boundary. Due to ODOT being a non-traditional entity, the probability for new HST connections within ODOT’s regulated MS4 boundary is minimal. Therefore, traditional mapping of HST outfalls into ODOT’s system offers limited benefit to improving water quality within ODOT’s MS4 regulated boundary.

### 2013 Annual Report Information and Status

**BMP Measurable Goals**

Track and report annually on the number of total permits issued associated with drainage, discharges or tie-into ODOT’s drainage system through R/W permits.  
Include any new right-of-way use permit locations into the District Office’s database.

**Summary of 2013 Program Activities or Results**

Right-of-Way use permits issued for drainage: (See Appendix G).

Right-of-Way use permits issued for NPDES permitted discharges: (See Appendix G).

Right-of-Way use permits issued for off lot wastewater discharges: (See Appendix G).

SWMP continues to provide technical assistance to district permit coordinators on reviewing and accepting new connections.

**Effective?** Yes  
**Notes:** All new concentrated discharges onto ODOT right-of-way are reviewed and authorized under ODOT’s right-of-way use permit policy.

### 2014 Program Information

**BMP Measurable Goals**

Track and report annually on the number of total permits issued associated with drainage.  
Include any new right-of-way use permit locations into the District Office’s database.

**2014 Proposed Activities**

Continue to issue right-of-way use permits for drainage, permitted NPDES discharges, HST discharges, and off-lot wastewater discharges.
### BMP Table 3-3

<table>
<thead>
<tr>
<th>Office Responsible for BMP Implementation</th>
<th>Illicit Discharge Detection Investigations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hydraulic Engineering</td>
<td>Relevant Permit Requirements</td>
</tr>
<tr>
<td></td>
<td>Part III.B.3.e (p. 8): You shall develop and implement a plan to detect and eliminate non-storm water discharges, including illegal dumping, to ODOT’s system.</td>
</tr>
</tbody>
</table>

**Decision Rationale:** ODOT implements illicit discharge detection and elimination through various methods including, outfall mapping and dry weather screening, internal and external reporting tools, construction plan notes and general maintenance and operation protocols.

<table>
<thead>
<tr>
<th>2013 Annual Report Information and Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>BMP Measurable Goals</td>
</tr>
<tr>
<td>Maintain and update mechanisms to detect illicit discharges as necessary.</td>
</tr>
<tr>
<td>Maintain policies and tools to eliminate illicit discharges.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Summary of 2013 Program Activities or Results</th>
</tr>
</thead>
<tbody>
<tr>
<td>ODOT maintained the SWMP website which provides a resource for employees and external public to report illicit discharges to the storm system.</td>
</tr>
<tr>
<td>ODOT maintained policies which require detection and elimination activities for construction projects and maintenance operations.</td>
</tr>
<tr>
<td>ODOT identified illicit discharges in 2013 = 0</td>
</tr>
<tr>
<td>ODOT eliminated illicit discharges in 2013 = 0</td>
</tr>
<tr>
<td>Consultant completed follow up dry weather screening in 2013. Consultant did not perform any additional outfall inventory in 2013.</td>
</tr>
</tbody>
</table>

| Effective? | Yes |
| Notes: | Implementing policies for maintenance and construction ensures that a large percentage of ODOT’s system is inspected for illicit discharges and if encountered eliminated. ODOT’s Statewide Public outreach also offers a mechanism for external and internal public to identify and report illicit discharges. |

### 2014 Program Information

<table>
<thead>
<tr>
<th>BMP Measurable Goals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Maintain and update mechanisms to detect illicit discharges as necessary.</td>
</tr>
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<td>Maintain policies and tools to eliminate illicit discharges.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>2014 Proposed Activities Report</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document illicit discharges identified via routine maintenance activities and construction.</td>
</tr>
<tr>
<td>Report any identified illicit discharges to proper authorities.</td>
</tr>
<tr>
<td>Continue to document IDDE activities.</td>
</tr>
</tbody>
</table>
2.4 Minimum Control Measure 4 – Construction Site Storm Water Runoff Control

2.4.1 MCM 4: MS4 OEPA Permit Requirements/ODOT SWMP Activity

Regulatory permit language below is shown as italicized and the ODOT program responses are shown in plain text. The permit language has been modified to be ODOT-specific.

Part III.B.4.a.i-vi.

*ODOT has developed and is implementing and enforcing a program to reduce pollutants in any storm water runoff to ODOT’s 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 ODOT’s program if that construction activity is part of a larger common plan of development or sale that would disturb one acre or more.*

ODOT uses Supplemental Specification 832 (SS 832), as the primary mechanism to address construction site storm water management. For ODOT construction projects, ODOT implements a process to reduce or eliminate pollutants contained in storm water runoff from construction sites. The process to maintain compliance is directly tied to utilizing the applicable OEPA construction storm water permits. The following are elements of ODOT’s construction general permit compliance:

- Proposed projects are reviewed and the project earth disturbed areas (EDA) are calculated to determine if an NOI is needed, as determined by the land disturbance threshold addressed in OEPA’s construction storm water general permit.
- The EDA is prominently displayed on the cover page of project plans as well as the Project Site Plan (*L&D Vol. 3, Section 1308*).
- SS 832 is added to the plans package.
- Estimated quantities of temporary sediment and erosion controls are calculated by the project design engineer.
- Central and/or District office submits project NOIs to OEPA.
- At pre-construction meetings, the selected contractor(s) are given a copy of the NOI with the OEPA approval letter.
- The contractor reviews and submits the project OEPA NPDES co-permittee/operator form. The contractor is responsible for oversight and compliance associated with all project sub-contractors relative to temporary sediment and erosion control and storm water quality management control practices.
- The Storm Water Pollution Prevention Plan (SWPPP) is developed by the contractor or a qualified sub-consultant that is registered as a professional Engineer and is CPESC certified that may or may not be employed directly by the contractor.
- The SWPP is designed and submitted to ODOT to conduct an acceptance review. Required inspections are performed by the contractor with oversight by SWPPP PE/CPESC engineer,
typically on a weekly basis. ODOT interacts with the contractor through weekly ODOT lead project progress meetings. As necessary, enforcement of permit requirements can be done through contract mechanisms. The Contractor's inspection staff shall be CESSWI certificated at a minimum.

- When the project is complete, ODOT submits the NOT to OEPA.

  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. ODOT's 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 ODOT's 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: OHC000003, OHCD00001 and OHC00001. If ODOT initially had coverage under a previous version of this permit ODOT shall revise ODOT's ordinance or other regulatory mechanism, if needed, within two years of when ODOT's coverage under this general permit was granted.**

  ODOT continues to update and revise Supplemental Specification 832 (SS 832) and related specifications/procedures to address OEPA's Construction General Permit, Storm Water Discharges Associated with Construction Activity statewide and within the Big Darby Creek Watershed and Storm Water Associated with Construction Activity within portions of the Olentangy River Watershed requirements. SS 832 and ODOT's L&D Vol. 2 are the primary, contractually-binding mechanisms ODOT uses to ensure project designs, inspection requirements, and other permit requirements are implemented at the project level.

  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;**

      Supplemental Specification 832, Section 832.08 – Maintenance.

  iv. **Procedures for storm water pollution prevention plan review which incorporate consideration of potential water quality impacts;**

      Supplemental Specification 832, Section 832.10 – SWPPP Acceptance.

  v. **Procedures for receipt and consideration of information submitted by the public;**

      Supplemental Specification 832 is a contract requirement for implementing erosion and sediment control during construction. ODOT's employee, consultant and contractor public all have input on development of the SWPPP. The facility stakeholder public has input on the project through the NEPA process and ODOT's Statewide Public communication network.
vi. Procedures for site inspection and enforcement of control measures.


Part III.B.4.b.

ODOT's storm water management program decision process includes the following information:

i. The mechanism (ordinance or other regulatory mechanism) ODOT will use to require erosion and sediment controls at construction sites and why ODOT chose that mechanism. If ODOT needs to develop this mechanism, describe ODOT's plan and a schedule to do so. If ODOT's ordinance or regulatory mechanism is already developed, include a copy of the relevant sections with ODOT's SWMP description;

The mechanism that ODOT implements to address this permit requirement is Supplemental Specification 832.

ii. ODOT's plan to ensure compliance with OEPA's erosion and sediment control regulatory mechanism, including the sanctions and enforcement mechanisms ODOT will use to ensure compliance. Describe ODOT's procedures for when ODOT will use certain sanctions. Possible sanctions include non-monetary penalties (such as stop work orders), fines, bonding requirements, and/or permit denials for non-compliance;

Supplemental Specification 832, Sections 832.04 and 832.10 address ODOT's contract provisions and the process for SWPPP acceptance.

iii. ODOT's 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;

ODOT's Construction and Material Specification (CMS) Item 202 describes the Department's specification for Removal of Structures and Obstructions; Item 203 describes Roadway excavation and embankment. Supplemental Specification 832, Section 832.04 – Requirements and Provisions. ODOT project NOIs are reported on OEPA's Construction NOI Storm Water General Permit List. This information can be located at OEPA's web site:

http://www.epa.state.oh.us/dsw/permits/gplist.aspx

iv. ODOT's procedures for pre-construction storm water pollution prevention plan review which incorporate consideration of potential water quality impacts. Describe the estimated number and percentage of sites that will have pre-construction site plans reviewed;

Supplemental Specification 832, Section 832.04 – Requirements and Provisions – States that a SWPPP shall be furnished that demonstrates compliance with OEPA's NPDES construction general permit. The SS 832 section cross references OEPA's CGP and related rules and requirements contained within. ODOT, also as part of SS 832.10, performs a SWPPP acceptance level review. Projects with unique environmental considerations are discussed with the contractor and District Environmental Coordinator (DEC) during the pre-
construction meeting, the discussion may include project erosion and sediment controls issues. ODOT process intends SWPPP acceptance reviews on 100 percent of ODOT-let projects requiring a SWPPP.

v. **ODOT’s procedures for receipt and consideration of information submitted by the public. Consider coordinating this requirement with ODOT’s Statewide Public education program;**

ODOT conducts public meetings associated with larger more complex design and construction projects, where the public can attend and contribute comments, suggestions, and concerns in full compliance with the National Environmental Policy Act (NEPA).

vi. **ODOT’s procedures for site inspection and enforcement of control measures, including how ODOT will prioritize sites for inspection;**

Supplemental Specification 832 and ODOT’s Construction Inspection Manual of Procedures outline ODOT’s inspection and enforcement of control measures. Since ODOT implements erosion and sediment control as a contract requirement, all projects may be considered an equal priority. However, projects having unique environmental considerations have increased oversight from internal staff. Typically, this oversight is coordinated through environmental commitments identified in the NEPA process.

vii. **Who is responsible for overall management and implementation of ODOT’s construction site storm water control program and, if different, who is responsible for each of the BMPs identified for this program.**

Each BMP table includes information on the responsible parties. Overall program management is the responsibility of ODOT’s Office of Hydraulic Engineering and the contact information is included in Appendix B.

viii. **Describe how ODOT will evaluate the success of this minimum measure, including how ODOT selected the measurable goals for each of the BMPs.**

The BMP tables include information associated with BMP effectiveness assessments. Success of the minimum control measure is discussed at the annual meetings and through other correspondence with staff.

**Part III.B.4.c. Performance Standards**

**ODOT’s construction site storm water control program shall include preconstruction 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 ODOT documents ODOT’s procedures for prioritizing inspections such as location to a waterway, amount of disturbed area, compliance of site, etc. If ODOT initially had coverage under a previous version of this permit ODOT shall revise ODOT’s program to satisfy these performance standards, if needed, within two years of when ODOT’s coverage under this general permit was granted.**
ODOT continues to assess and update the Specifications, L&D Manuals, Standard Drawings, and changes in permit requirements to ensure ODOT is addressing, reporting on, and providing the appropriate documentation, as well as guidance to ODOT's on-site contractors, consultants, and system users regarding construction storm water management activities and requirements.

**Part III.B.4.d. Annual Report**

*ODOT's annual report shall document the following: (1) number of applicable sites in ODOT's 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.*

ODOT's storm water management program addresses items 1-6 as follows:

1. ODOT continues to track active projects through contracts statewide.
2. ODOT conducts pre-construction meetings for each project. These address project specific erosion and sediment control needs. ODOT conducts SWPPP acceptance reviews as part of SS 832.10.
3. ODOT requires the selected project contractor to perform temporary E/S inspections based on the permit requirements and as stated in Supplemental specification 832 for compliance with the Construction General Permit.
4. Notice of Violations (NOVs) are addressed at the project level for standard NOV issues. ODOT maintains a regulatory liaison designated employee located in the Central Office, Office of Construction Administration that performs oversight of NOVs and responses as needed. This liaison maintains a close working relationship with all regulatory agencies.
5. ODOT maintains a regulatory liaison to aid in responding to enforcement actions.
6. Project complaints are accepted by the District through a “hotline” number. The District determines the level of response necessary.
7. OES has developed an environmental commitment tracking system (ECTS) that will allow ODOT to track project environmental commitments for the duration of the project. These commitments will include storm water management.

**2.4.2 Construction Site Storm Water Runoff Control BMP Tables**

The BMP Table 4-1 contains implementation information associated with BMP activities and measurable goals.
### BMP Table 4-1

<table>
<thead>
<tr>
<th>Office Responsible for BMP Implementation</th>
<th>Relevant Permit Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Construction Administration/Hydraulic Engineering/Office of Environmental Services</td>
<td>Part III.B.4.c (p. 12): ODOT’s construction site storm water control program shall include 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.</td>
</tr>
</tbody>
</table>

**Decision Rationale:** ODOT project designs are required to include Supplemental Specification 832, which defines ODOT’s procedures and contractor contract requirements for temporary erosion and sediment control during construction. The specification provides minimum quality standards to maintain compliance with Ohio EPA’s Construction General Permit. ODOT will continue to oversee contractor erosion and sediment control activities through regular project progress meetings and contract oversight reviews.

### 2013 Annual Report Information and Status

<table>
<thead>
<tr>
<th>BMP Measurable Goals</th>
<th>2013 Activities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reduce pollutants from construction site runoff through contract implementation.</td>
<td>NOI’s and NOT’s were executed through project files and contract documents for all applicable projects.</td>
</tr>
<tr>
<td>ODOT’s Statewide Public has working knowledge of implementing ODOT’s publications and specifications.</td>
<td>Provided training for ODOT employees, consultants, and contractors on compliance requirements, contract implementation and maintaining CPESC/CESSWI certifications. See Appendix E.</td>
</tr>
<tr>
<td>Maintain publications with current regulatory compliance BMPs.</td>
<td>SWMP staff offered technical expertise on projects in permit specific watersheds or environmentally sensitive areas.</td>
</tr>
<tr>
<td></td>
<td>SWMP staff continued to provide technical assistance as requested for Facility projects developed by OFCC.</td>
</tr>
<tr>
<td></td>
<td>ODOT maintained regulatory liaison through Construction Administration that addressed project compliance issues.</td>
</tr>
<tr>
<td></td>
<td>ODOT, through implementation and enforcement of supplemental Specification 832, and the SWPPP engineer shall at a minimum review any TMDL approved for the waterbody into which the site is discharging into and shall consider recommended BMPs as stated in the TMDL study to demonstrate compliance with the CGP as stated in SS 832.</td>
</tr>
<tr>
<td></td>
<td>Completed development of the environmental commitment tracking system (ECTS) for roll out in 2014.</td>
</tr>
<tr>
<td></td>
<td>ODOT continued to review SS 832 against 2012 new statewide and watershed-specific construction or alternative construction general permits to assure consistency between permit requirements and SS 832 requirements. These reviews resulted in SS 832 being revised in October 2013.</td>
</tr>
</tbody>
</table>

**Effective?** Yes

**Notes:** The intent of this BMP provides pollutant reduction strategies on land disturbing projects greater than 1 acre through contract execution. Projects that disturb 1 acre or greater are required via SS 832 to receive temporary erosion and sediment controls and inspection of BMP performance as a result of the implementation of the contract.

### 2014 Program Information

<table>
<thead>
<tr>
<th>BMP Measurable Goals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reduce pollutants from construction site runoff through contract implementation.</td>
</tr>
<tr>
<td>ODOT’s Statewide Public has working knowledge of implementing ODOT’s publications.</td>
</tr>
<tr>
<td>Maintain publications with current regulatory compliance BMPs.</td>
</tr>
<tr>
<td>2014 Proposed Activities</td>
</tr>
<tr>
<td>------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Continue, as part of the SWMP, to provide technical expertise in support of program</td>
</tr>
<tr>
<td>implementation.</td>
</tr>
<tr>
<td>Continue to review and approve SWPPP’s submitted by consultants or contractors for</td>
</tr>
<tr>
<td>projects within the Big Darby/Olentangy River Watersheds.</td>
</tr>
<tr>
<td>Continue to require CPESC and CESSWI certified professionals for every applicable</td>
</tr>
</tbody>
</table>
| ODOT project administered, in compliance with SS 832 and existing open Findings and Orders.
| Continue to evaluate appropriate revisions to SS 832 and L&D Manuals (i.e., Volumes 1, 2   |
| and 3) to further ensure the Contractor developed SWPPP include proper BMPs, as        |
| recommended by any approved TMDL watershed studies that ODOT’s project is being         |
| implemented within.                                                                     |
| Continue to review Facility design plans as requested by OFCC for compliance with SS 832. |
| Discuss approaches as to how ODOT should track, assess or review existing and pending    |
| TMDLs and incorporate recommended BMPs as required as part of the TMDL studies.           |
| Continue to review SS 832 against any new statewide and watershed-specific construction or|
| updated alternative construction general permits to assure consistency between permit      |
| requirements and SS 832 requirements.                                                    |
| Review and comment on the 2014 release of Ohio EPA’s Municipal Separate Storm Sewer System draft Permit |
2.5 Minimum Control Measure 5 – Post-Construction Storm Water Management for New Development and Redevelopment

2.5.1 MCM 5: MS4 OEPA Permit Requirements/ODOT SWMP Activity

Regulatory permit language below is shown as italicized and the ODOT program responses are shown in plain text. The permit language has been modified to be ODOT-specific.

Part III.B.5.a.

_**ODOT 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 discharges into ODOT’s small MS4. ODOT’s program shall ensure that controls are in place that will prevent or minimize water quality impacts;**_

Post-construction BMPs must be integrated into applicable ODOT projects as part of the planning and design process. ODOT's _L & D Vol. 2_ includes policy and procedures associated with post-construction BMP selection and design. BMPs are then installed as part of project construction in accordance with ODOT’s specifications.

Part III.B.5.b.

_**ODOT shall develop and implement strategies which include a combination of structural and/or non-structural BMPs appropriate for ODOT’s community;**_

ODOT’s _L&D Vol. 2_ includes policy and procedures (Sections 1115 through 1117) associated with incorporating post-construction controls within or as part of ODOT design/construction projects.

All consultants and employees developing ODOT projects are directed to use the latest version of the _L&D Manuals_ which is continuously updated to address current strategies for design and selection of post-construction BMPs.

Part III.B.5.c.

_**ODOT 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. ODOT’s 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 ODOT’s 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: OHC000003, OHCD00001 and OHC000001.**_

The _L&D Manuals_ are a contractually-binding set of design requirements for all projects within ODOT’s R/W and is referred to as an acceptable method for post-construction BMP design in Ohio EPA’s Construction General Permit. ODOT oversees development of design drawings for compliance with L&D requirements and NEPA commitments at the District and Central Office level. Contractors are contractually bound to construct and protect post-construction BMPs during the course of construction as shown on the construction documents through the project contract enforcement.
Part III.B.5.d.

**ODOT shall ensure adequate long-term operation and maintenance of BMPs.**

ODOT has a statewide maintenance program to maintain post construction controls within ODOT Right-of-Way, such as vegetated biofilters, roadside ditches, and additional roadside infrastructure. ODOT is currently addressing how best to track BMP location information at the County level to ensure that BMPs are consistently operated and maintained across ODOT Districts.

Part III.B.5.e.

ODOT's storm water management program post-construction BMP decision process includes the following information:

1. **ODOT's program to address storm water runoff from new development and redevelopment projects. Include in this description any specific priority areas for this program.**

   ODOT's *L&D Vol. 2* includes policy and procedures (Sections 1115 through 1117) associated with incorporating post-construction controls as part of ODOT design/construction projects. The manual references the Ohio EPA's statewide and watershed-specific Construction General Permits and must be approved by Ohio EPA prior to implementing major changes. Conformance with all applicable state NPDES permits is also an environmental commitment coordinated through the NEPA process on projects that are federally funded. This provides additional planning and design oversight on environmentally sensitive projects that address local or regional storm water impacts.

2. **How ODOT's program will be specifically tailored for ODOT's local community, minimize water quality impacts, and attempt to maintain pre-development runoff conditions.**

   ODOT's *L&D Vol. 2* includes policy and procedures (Sections 1115 through 1117) associated with incorporating post-construction controls as part of ODOT design/construction projects. The manual references the Ohio EPA's statewide and watershed-specific Construction General Permits and must be approved by Ohio EPA prior to implementing major changes. Conformance with all applicable state NPDES permits is also an environmental commitment coordinated through the NEPA process on projects that are federally funded. This provides additional planning and design oversight on environmentally sensitive projects that address local or regional storm water impacts.

3. **Any non-structural BMPs in ODOT's program, including, as appropriate: 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.

Non-structural BMPs include activities described in Minimum Control Measures 1 and 2 for public outreach and education and public involvement. ODOT employees and consultants must use the latest L&D Vol. 2 for design procedures associated with post-construction BMPs. ODOT also coordinates local or regional storm water impacts through the NEPA planning process on all federally funded construction projects. Therefore, ODOT’s non-structural BMPs associated with this MCM reach a large percentage of ODOT’s Statewide Public. The SWMP continuously reviews and monitors improvements to these non-structural BMPs and attempts to increase our public outreach efforts through local training, research, publication updates and ODOT’s communication network.

iv. **Any structural BMPs in ODOT’s program, including, as appropriate: 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.**

ODOT's L&D Vol. 2 includes policy and procedures (Sections 1115 through 1117) associated with incorporating appropriate post-construction controls.

v. **The mechanisms (ordinance or other regulatory mechanisms) ODOT will use to address post construction runoff from new developments and redevelopments and why ODOT chose the mechanism(s). If ODOT needs to develop a mechanism, describe ODOT’s plan and a schedule to do so. If ODOT’s ordinance or regulatory mechanism is already developed, include a copy of the relevant sections with ODOT’s program.**

ODOT's L&D Vol. 2 includes policy and procedures (Sections 1115 through 1117) associated with incorporating post-construction controls as part of ODOT design/construction projects. The manual references the Ohio EPA’s statewide and watershed-specific Construction General Permits and must be approved by Ohio EPA prior to implementing major changes. Conformance with all applicable state NPDES permits is also an environmental commitment coordinated through the NEPA process on projects that are federally funded. This provides additional planning and design oversight on environmentally sensitive projects that address local or regional storm water impacts. ODOT worked with OEPA to develop a response to the permit requirements.

vi. **How ODOT will ensure the long-term operation and maintenance (O&M) of ODOT’s selected BMPs. Options to help ensure that future O&M responsibilities are clearly identified include an agreement between ODOT and another party such as the post-development landowners or regional authorities.**

ODOT has a statewide maintenance program to maintain post-construction controls within ODOT Right-of-Way, such as vegetated biofilters, roadside ditches, and additional roadside infrastructure. ODOT is currently addressing how best to track BMP location information at the County level to ensure that BMPs are consistently operated and maintained across ODOT Districts. ODOT is evaluating preferred operations and maintenance procedures for each type of BMP to ensure these are maintained properly.
vii. Who is responsible for overall management and implementation of ODOT's post-construction SWMP and, if different, who is responsible for each of the BMPs identified for this program.

Each BMP table includes information on the responsible parties. Overall program management is the responsibility of ODOT's Office of Hydraulic Engineering, and the contact information is included as part of Figure 1-1 in Section 1.

viii. How ODOT will evaluate the success of this minimum measure, including how ODOT selected the measurable goals for each of the BMPs.

The BMP tables include information associated with BMP appropriateness assessments. Success of the minimum control measure is discussed at the annual meetings and through other correspondence with staff.

Part III.B.5.f. Performance Standards

ODOT's post-construction SWMP shall include 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. ODOT's program shall also ensure that long-term operation and maintenance (O&M) plans are developed and agreements in place for all applicable sites. If ODOT initially had coverage under a previous version of this permit ODOT shall revise ODOT's program to satisfy these performance standards, if needed, within two years of when ODOT's coverage under this general permit was granted.

ODOT is identified as a Non-traditional MS4 entity and therefore maintains flexibility in addressing these performance standards. As previously described, in MCM 4, and in previous sections in this MCM, ODOT maintains compliance with these performance standards through specifications, manuals, training and policies.

Part III.B.5.g. Annual Report

ODOT's annual reports shall document the following: (1) number of applicable sites in ODOT's 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.

ODOT's storm water management program addresses items 1-4 as follows:

1. ODOT continues to track applicable projects through engineering/design contracts statewide, as ODOT completes the NOI/NOTs for each appropriate project.
2. ODOT has oversight on projects that require post-construction BMPs through the design process and engineering/design contracts.
3. ODOT's operations and maintenance policies ensure on-going performance of the public infrastructure.
2.5.2 Post-Construction Control BMP Tables

The BMP Tables 5-1 and 5-2 contain implementation information associated with Post Construction BMP design, construction, operation and maintenance activities, and measurable goals.

**BMP Table 5-1**

<table>
<thead>
<tr>
<th>5.1</th>
<th>Design and Construction of Post Construction Storm Water Management BMPs</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Office Responsible for BMP Implementation</strong></td>
<td><strong>Relevant Permit Requirements</strong></td>
</tr>
<tr>
<td>Hydraulic Engineering /Construction Administration/ Maintenance Administration</td>
<td>Part III.8.5.a (p. 12): 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, and Part III B.5.b (p. 12) ODOT shall develop and implement strategies which include a combination of structural and non-structural BMPs.</td>
</tr>
</tbody>
</table>

**Decision Rationale:** ODOT incorporated post-construction BMP design requirements into the L&D Vol. 2. All projects designed under ODOT’s specifications shall incorporate the latest design criteria. The L&D Vol. 2 was incorporated into Ohio’s NPDES Construction General Permit for linear construction projects.

**2013 Annual Report Information and Status**

<table>
<thead>
<tr>
<th>BMP Measurable Goals</th>
<th>Summary of 2013 Program Activities or Results</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ensure post-construction BMP’s are selected, designed and constructed on appropriate ODOT projects.</td>
<td>Updates were made to the L&amp;D Vol. 2 to address OEPA recommendations associated with the research findings presented on the Ex-filtration trench.</td>
</tr>
<tr>
<td>Maintain L&amp;D Vol. 2 with current compliance strategies.</td>
<td>OFCC continued to be responsible for ensuring new or modified ODOT facilities incorporated appropriate post-construction water quality best management practices.</td>
</tr>
</tbody>
</table>

**2014 Program Information**

<table>
<thead>
<tr>
<th>BMP Measurable Goals</th>
<th>2014 Proposed Activities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ensure post-construction BMP’s are selected, designed and constructed on all appropriate projects.</td>
<td>Continue to update ODOT’s publications associated with post-construction BMPs as needed.</td>
</tr>
<tr>
<td>Maintain L&amp;D Vol. 2 with current compliance strategies.</td>
<td>Continue to track developments related to statewide or watershed-specific construction or alternative general permits and identify specific storm water management requirements unique to that watershed.</td>
</tr>
</tbody>
</table>

**Notes:** Implementing ODOT’s publications to address post-construction BMP designs ensures compliance with Ohio EPA’s NPDES programs on all appropriate ODOT projects.

**2014 Proposed Activities**

- Continue to provide support as requested by OFCC associated with new ODOT facility construction related to post-construction water quality or storm water quantity control.
### BMP Table 5-2

**5.2 Operation and Maintenance of Post Construction Storm Water Management BMPs**

<table>
<thead>
<tr>
<th>Office Responsible for BMP Implementation</th>
<th>Relevant Permit Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hydraulic Engineering/Maintenance Administration</td>
<td>Part III.B.5.e.vi (p. 13): How ODOT will ensure the long-term operation and maintenance (O&amp;M) of project designed BMPs.</td>
</tr>
</tbody>
</table>

**Decision Rationale:** ODOT incorporates long-term inspection and maintenance of post-construction BMPs into ODOT’s standard operating procedures. The Maintenance & Operations Manual describes employee responsibilities for maintaining the Department’s infrastructure assets including post-construction BMPs. Each District maintains responsibility for management of long-term inspection and maintenance through County work forces.

### 2013 Annual Report Information and Status

<table>
<thead>
<tr>
<th>BMP Measurable Goals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Maintain location database of all post-construction BMPs.</td>
</tr>
<tr>
<td>Maintain inspection and maintenance log for ODOT post-construction BMPs.</td>
</tr>
<tr>
<td>Ensure maintenance publication is updated with current BMP maintenance and operation practices.</td>
</tr>
</tbody>
</table>

**Summary of 2013 Program Activities or Results**

<p>| |</p>
<table>
<thead>
<tr>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Continued to include planning for maintenance forces and to provide an increased understanding of post-construction BMP operation and maintenance implementation.</td>
</tr>
<tr>
<td>ODOT completed and finalized both post-construction BMP research projects in 2013.</td>
</tr>
<tr>
<td>Continued research associated with material handling and disposal of waste products generated from standard BMP maintenance.</td>
</tr>
<tr>
<td>Performed training on maintenance procedures for permanent BMPs. Refer to Appendix E.</td>
</tr>
<tr>
<td>Continued to develop a system to track locations and record long-term maintenance activities performed on ODOT post-construction BMPs.</td>
</tr>
</tbody>
</table>

**Effective?** Yes

**Notes:** The intent of this BMP is to integrate maintenance and operations into the daily work routines of ODOT employees to ensure long-term commissioning and functionality of post-construction BMPs.

### 2014 Program Information

<table>
<thead>
<tr>
<th>BMP Measurable Goals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Maintain location database of all post-construction BMPs.</td>
</tr>
<tr>
<td>Maintain inspection and maintenance log.</td>
</tr>
<tr>
<td>Ensure maintenance publication is updated with current BMP maintenance and operation practices.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>2014 Proposed Activities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Continue to update/revise the MOM and/or County Work Plans associated with post-construction BMP operations and maintenance.</td>
</tr>
<tr>
<td>Continue to develop BMP location and inspection/maintenance database.</td>
</tr>
<tr>
<td>Continue to educate and train ODOT’s Statewide Public on correct operation and maintenance procedures.</td>
</tr>
</tbody>
</table>
2.6 Minimum Control Measure 6 – Pollution Prevention and Good Housekeeping Program Plan

2.6.1 MCM 6: MS4 OEPA Permit Requirements/ODOT SWMP Activity

Regulatory permit language below is shown as italicized and the ODOT program responses are shown in plain text. The permit language has been modified to be ODOT-specific.

Part III.B.6.a.

*ODOT 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.*

ODOT has developed operation and maintenance activities for ODOT facilities under BMPs 6.1 and 6.2, respectively. Training activities are described under MCMs 1 and 2.

Part III.B.6.b.

*Using training materials that are available from Ohio EPA or other organizations, ODOT's 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.*

ODOT has developed internal and external training programs activities and are described in MCMs 1 and 2. ODOT's employee public that oversee operations and maintenance activities receive training from the SWMP, Environmental Services, LTAP, Office of Training and district staff.

Part III.B.6.c.

1) *ODOT shall include a list of industrial facilities ODOT owns or operates 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 that ultimately discharge to ODOT's MS4. Include the Ohio EPA permit number or a copy of the Industrial NOI form for each facility. 2.) For ODOT's 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 (SWPPP) shall be developed and implemented in accordance with the SWPPP requirements of Ohio EPA's Industrial Storm Water General Permit (OHR000005). If ODOT initially had coverage under a previous version of this permit ODOT shall develop and implement SWPPPs for these facilities, if needed, within two years of when ODOT's coverage under this general permit was granted.*

1) ODOT has evaluated its facilities-based Ohio EPA’s Industrial Storm Water General Permit (OHR000005) requirements and has determined that based on the current operations and storage practices conducted at these facilities they do not meet the permit requirements associated with the Industrial General Permit.

2) ODOT is currently working on completing and updating Spill Pollution Control and Countermeasure plans (SPCC) plans for ODOT facilities that currently have above ground and
underground storage tank facilities as required in 40 CFR 112. ODOT is currently working on a process to develop SWPPPs for all facilities within the MS4 regulated boundary that conduct activities described in 40 CFR 122.26(b).

**Part III.B.6.d.**

ODOT's storm water management program decision process includes the following information:

**i. ODOT's operation and maintenance program to prevent or reduce pollutant runoff from ODOT's municipal operations. ODOT's program shall specifically list the municipal operations that are impacted by this operation and maintenance program.**

ODOT's MCM 6 BMPs address these requirements. See BMP Tables 6-1 and 6-2 for details. ODOT's maintenance operation continuously minimizes the use or application of materials that potentially impair water quality.

**ii. Any government employee training program ODOT 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 ODOT plans 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.**

ODOT has developed internal and external training program activities and are described in MCMs 1 and 2. ODOT's employee public that oversee operations and maintenance activities receive training from the SWMP, Environmental Services, LTAP, Office of Training and district staff.

**iii. ODOT's program description shall specifically address the following areas:**

- **a. Maintenance activities, maintenance schedules, and long-term inspection procedures for controls to reduce floatables and other pollutants to ODOT’s MS4.**

  Each ODOT district undergoes an Environmental Compliance Review (ECR) every two years which is overseen by Central Office, Office of Environmental Services staff. The Central Office staff works with the District Environmental Coordinator to perform compliance reviews at multiple maintenance facilities throughout the district. A schedule of compliance reviews performed in 2013 can be seen in the BMP table. The schedule indicates that each District Headquarter and County Garage will have an ECR at least every four years. The ECR looks at operations performed at the district and the maintenance practices including, but not limited to hazardous/solid waste management, paint booths, fueling operations, SPCC plans, equipment storage/repair, BMPs, sanitary facilities and salt management practices.

- **b. 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 ODOT operates. 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.

Controls for reducing or eliminating the discharge of pollutants are described in the BMP tables.

ODOT’s research focused on street sweeping and storm sewer system clean out materials and decanting of these materials proper disposal based on the hazardous nature of the spoil material.

ODOT’s snow and ice removal program includes a variety of treatment options adopted from established best practices and proven snow and ice removal methods that continue to provide more efficient delivery methods. These reduction practices help optimize application of deicing materials. Work strategies include anti-icing and deicing techniques. Anti-icing is a proactive approach geared towards preventing the formation of black ice and frost and to prevent a freeze bond of ice and snow to the pavement surface.

ODOT is a leader to many communities for deicing applications and continues to develop programs to optimize the application of deicers to the environment. Technology and innovation play key roles in ODOT’s approach to both efficient and effective operations associated with highway and facility winter weather deicing operation activities. ODOT continues to develop equipment and technology through research that offers education and outreach to many communities for optimizing deicing activities and potentially reducing the impacts to the environment. The practices offer a state-wide benefit that exceeds the MS4 permit requirements.

c. Procedures for the proper disposal of waste removed from ODOT’s MS4 and ODOT’s municipal operations, including dredge spoil, accumulated sediments, floatables, and other debris.

The SWMP, Office of Environmental Services and Facilities are currently working on educating ODOT’s Statewide Public on proper disposal procedures for the handling of wastes removed from ODOT’s system statewide. Based on ODOT’s linear system, this requirement is not easily addressed without offering major inefficiencies to operation activities. ODOT currently is working on multiple research projects (2012 -2013) that may offer solutions to optimizing this effort. This research, along with efforts conducted by the EPA, may provide beneficial reuse options for waste materials. The SWMP will continue to monitor ODOT’s current and future practices in attempts to increase awareness on material handling procedures.

d. 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.
ODOT addresses flood management and flood control issues on a project by project basis as part of their project development process and any necessary flood control elements are incorporated during project design. In addition, ODOT incorporates water quality controls (i.e., storm water management) as part of ODOT’s project development process.

iv. **Who is responsible for overall management and implementation of ODOT’s pollution prevention/good housekeeping program and, if different, who is responsible for each of the BMPs identified for this program.**

The SWMP, Office of Environmental Service, Maintenance Administration and Facilities share responsibilities associated with this MCM. SWMP program management is the responsibility of the ODOT Office of Hydraulic Engineering, and the contact information is included in Appendix B.

v. **How ODOT will evaluate the success of this minimum measure, including how ODOT selected the measurable goals for each of the BMPs.**

The BMP tables include information associated with BMP effectiveness assessments. Success of the minimum measure is discussed at the annual meetings and through other correspondence with staff.

**Part III.B.6.e. Performance Standards**

**ODOT's pollution prevention/good housekeeping program shall include, at a minimum, an annual employee training. ODOT's operation and maintenance programs shall include appropriate procedures, controls, maintenance schedules, and recordkeeping, to address Parts III.B.6.d.iii of this permit.**

MCMs 1 and 2 provide information on ODOT’s Statewide Public education/outreach and public involvement activities.

**Part III.B.6.f. Annual Report**

**ODOT's 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 ODOT's operation and maintenance program.**

**2.6.2 Pollution Prevention and Good Housekeeping BMP Tables**

The BMP Tables 6-1 and 6-2 contain implementation information associated with Maintenance and Operation activities and measurable goals.
### BMP Table 6-1

**Office Responsible for BMP Implementation**

**Relevant Permit Requirements**

<table>
<thead>
<tr>
<th>Maintenance Administration / Facilities / Hydraulic Engineering / Office of Environmental Services</th>
</tr>
</thead>
<tbody>
<tr>
<td>Part III.B.6.d.iii (p. 14): Your program shall specifically address the following areas:</td>
</tr>
<tr>
<td>1) Maintenance activities, maintenance schedules, and long-term inspection procedures for controls to reduce floatables and other pollutants to your MS4;</td>
</tr>
<tr>
<td>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;</td>
</tr>
<tr>
<td>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; and</td>
</tr>
<tr>
<td>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. If ODOT initially had coverage under a previous version of this permit ODOT shall develop and implement SWPPPs for these facilities, if needed, within two years of when ODOT’s coverage under this general permit was granted.</td>
</tr>
</tbody>
</table>

**Decision Rationale:** ODOT incorporates pollution prevention and good housekeeping strategies into standard operating procedures. The Maintenance & Operations Manual describes employee responsibilities maintaining the Department’s infrastructure assets. Each District maintains responsibility for implementing these pollution prevention strategies.

### 2013 Annual Report Information and Status

**BMP Measurable Goals**

- Reduce and minimize pollutants associated with roadside vegetation management.
- Prevent non-storm water spills from ODOT maintenance operations.
- Reduce pollutants from waste material storage and handling operations generated from maintenance activities.
- Reduce sediment discharge through storm water runoff and erosion and sediment control practices for maintenance projects.
- Reduce the discharge of pollutant from ODOT maintenance activities through increased education.
- Remove litter and trash from ODOT’s MS4 system Statewide.
- Reduce pollutants to ODOT’s MS4 system Statewide from deicing operations through updating ODOT publications and policies.
- Address flood control requirements through project planning and design.

**Summary of 2013 Program Activities or Results**

ODOT will continue to operate an Integrated Vegetation Management (IVM) program to properly manage impacts to the environment associated with vegetation management practices. The following are activities performed in support of this program:

- ODOT maintained current requirements associated with training and certifications for herbicide applicators in 2013.
- ODOT continued implementing modified mowing guidelines which will play a major role with reduced fuel consumption and may allow for increased vegetation growth and density. This may translate into promoted sheet flow and increased infiltration of storm water.
- Contracted mowing for all interstates and interstate look alikes. Mowing frequency associated with mowing contracts – urbanized areas 6 times /season; rural areas – 4 times per season and 1 mowback (mow to R/W) – 1 time per season.

Spill prevention control and countermeasure activities included:

- ODOT continued to require spill kits at all fueling operations and required for all contractor heavy equipment construction vehicles working on projects with 401/404 permits. ODOT no longer places spill kits in ODOT dump trucks – Rationale is that they present a safety and space issue.
- Prepare and update SPCC plans for all facilities that exceed thresholds established in...
| Effective? | Yes |
| Notes: | The intent of this BMP is to continue to integrate pollution prevention and good housekeeping into the daily work routines of ODOT employees. |

### 2014 Program Information

**BMP Measurable Goals**

- Reduce pollutants associated with roadside vegetation management.
- Prevent non-storm water spills from ODOT maintenance operations.
- Reduce pollutants from waste material storage and handling operations generated from maintenance activities.
- Reduce sediment discharge through storm water runoff from maintenance projects.
- Reduce the discharge of pollutant from ODOT maintenance activities through increased education.
- Remove litter and trash from ODOT’s MS4 system Statewide.
- Reduce pollutants to ODOT’s MS4 system Statewide from deicing operations through updating ODOT publications and policies.
- Address flood control requirements through project planning and design.
- Reduce pollutants associated with roadside vegetation management.

**2014 Proposed Activities**

- ODOT will continue to operate an Integrated Vegetation Management (IVM) program to properly manage impacts to the environment associated with vegetation management practices.
- Continue to address spill prevention control and countermeasure activities.
- Complete revisions to Highway Maintenance Environmental checklist and supporting manual.
- Begin to complete ODOT facility storm water pollution prevention plans.
- Provide public education/outreach and public involvement as described in MCM’s 1 and 2. Through the publications, programs and research, ODOT attempted to reduce long-term pollutant impacts to the environment.
- Continue to revise and update MOM to include storm water management activities and stormwater requirements for ODOT maintenance projects.
- Continue to update and revise appropriate manuals, specifications and standard drawings as needed to address storm water management program needs.
Section 2 • Permit Requirement and Best Management Practice (BMP) Tables

BMP Table 6-2

<table>
<thead>
<tr>
<th>Office Responsible for BMP Implementation</th>
<th>Relevant Permit Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Maintenance Administration / Facilities Management / Hydraulic Engineering</td>
<td>Part III.B.6.d.iii (p. 14): Your program 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; and 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. If ODOT initially had coverage under a previous version of this permit ODOT shall develop and implement SWPPPs for these facilities, if needed, within two years of when ODOT’s coverage under this general permit was granted.</td>
</tr>
</tbody>
</table>

Decision Rationale: ODOT incorporates pollution prevention and good housekeeping strategies into standard operating procedures at ODOT facilities. ODOT publications describe employee responsibilities at facilities. Each District maintains responsibility for implementing these pollution prevention strategies.

2013 Annual Report Information and Status

BMP Measurable Goals
- Prevent non-storm water spills at ODOT facilities through spill prevention, control and countermeasure procedures.
- Reduce pollutants from waste material storage and handling operations generated from maintenance activities.
- Educate ODOT’s Statewide Public on Best Management Practices associated with facility and maintenance operations.
- Replace outdated equipment and facilities in efforts to reduce pollutants and optimize statewide operations at ODOT facilities.

Summary of 2013 Program Activities or Results
- Spill prevention control and countermeasure activities at ODOT facilities
  - Prepare and update SPCC plans for all facilities that exceed thresholds established in 40 CFR 112.
  - ODOT completed 15 Spill Prevention Control and Countermeasure Plans (SPCC) and 20 updates.
  - Performed Environmental Compliance Reviews for Districts 1, 2, 3, 4.
  - District Environmental Coordinators were responsible for performing ECR’s at ODOT’s facilities.
  - ODOT has a tank program within the Office of Environmental Services that removes old underground storage tanks and replaces them with new aboveground storage tanks. ODOT continued to develop this program.
- Provide public education/outreach and public involvement as described in MCM’s 1 and 2. Through the following publications, programs and research, ODOT attempted to reduce long-term pollutant impacts to the environment:
  - The SWMP provided technical assistance to the Office of Facilities on compliance strategies for internal facility construction projects.
  - Conducted research on waste materials generated from ODOT facilities and maintenance activities. Research will be used to provide treatment or disposal optimization options at ODOT facilities for generated wastes.
  - ODOT published Ohio’s Salt Storage Guidance Document in cooperation with the Ohio Water Resource Council partners.
Office of Facilities and Equipment Management continued to develop a statewide planning program to optimize ODOT’s equipment and facility operations.

<table>
<thead>
<tr>
<th>Effective?</th>
<th>Yes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Notes:</td>
<td>The intent of this BMP is to continue to integrate pollution prevention and good housekeeping into the daily work routines of ODOT employees.</td>
</tr>
</tbody>
</table>

2014 Program Information

**BMP Measurable Goals**

- Prevent non-storm water spills at ODOT facilities through spill prevention, control and countermeasure procedures.
- Reduce pollutants from waste material storage and handling operations generated from maintenance activities.
- Educate ODOT’s Statewide Public on Best Management Practices associated with facility and maintenance operations.
- Replace outdated equipment and facilities in efforts to reduce pollutants and optimize statewide operations at ODOT facilities.

**2014 Proposed Activities**

- Develop and implement a program for preparing Stormwater Pollution Prevention Plans, continuing education and inspection protocols at ODOT facilities.
- Begin to complete ODOT facility storm water pollution prevention plans.
- Continue to address spill prevention control and countermeasure activities.
- Provide public education/outreach and public involvement as described in MCM’s 1 and 2. Through publications, programs and research, ODOT attempted to reduce long-term pollutant impacts to the environment.
- Continue to support research on pollution prevention activities associated with ODOT facility operations.
- Continue to update and revise appropriate manuals, specifications and standard drawings as needed to address storm water management program needs.
2.7 Reviewing and Updating ODOT’s Storm Water Management Program

1. SWMP Review: ODOT shall do an annual review of your SWMP in conjunction with the preparation of the annual report.

As part of ODOT’s development of the 2013 Annual Report, ODOT reviewed the permit requirements and ODOT’s responses to the requirements. In addition, ODOT reviewed the measureable goals, 2013 program activities and activities ODOT is forecasting to be completed as part of this program for 2014.

2. SWMP Update: ODOT can change their SWMP during the life of the permit in accordance with the following procedures:

   a. Changes adding components, controls or requirements to the SWMP may be added at any time upon written notification from Ohio EPA.

   b. Changes replacing ineffective or in feasible BMPs specifically identified in the SWMP with an alternate BMP may be requested at any time.

The following summarize the significant program modifications for 2013:

- Minimum Control Measure 5 – One of the tools in the post-construction water quality tool box based on research findings was removed in 2013 per OEPA. ODOT has under taken a review, evaluation and assessment as to the viability of implementing an In-lieu-fee program that would require a feasibility assessment be conducted in order to determine that no current BMPs that ODOT has in the toolbox are feasible for the specific ultra urban project. At this point ODOT will review the feasibility study and determine if the fee-in-lieu is appropriate.

2.8 Evaluating, Record Keeping and Reporting

A. Evaluating

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

Each program BMP is evaluated annually to determine how appropriately it addresses ODOT’s storm water program needs. In the past, ODOT has merged, redefined, renamed, or in other ways changed the format of the BMPs associated with each MCM to maintain appropriate measurable goals and activities.

B. Record keeping

1. You shall retain copies of all reports required by this permit, a copy of the NPDES permit, and record 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 and the SWMP, available to the public if requested to do so in writing.
Section 2 • Permit Requirement and Best Management Practice (BMP) Tables

ODOT will organize, file, and maintain SWMP records for the required three-year retention period.

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 a previous version of this permit you shall submit your 2008 annual report by the required due date of that previous generation permit. The first report required by this permit is due April 1, 2010. 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;

For Table of Organization see Appendix B.

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;

ODOT’s SWMP has been developed to integrate ODOT’s policies, practices, and programs into storm water management education, controls, implementation, and training. The SWMP objective being to eliminate, reduce or minimize pollutants from entering ODOT’s owned and operated storm sewer system as a result of ODOT’s operation and maintenance practices and other pollutant sources within ODOT right-of-way.

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;

Table 2-1 provides a summary of current and recently completed research that ODOT either has sponsored in conjunction with FHWA or is involved with through pooled funds with other DOT’s or has sponsored directly. The intent of this table is to provide a snapshot of the types of water quality or storm water research the department is investing in as approaches towards increasing storm water and storm water runoff quality.

<table>
<thead>
<tr>
<th>Table 2-1. ODOT Research and Pooled Funds</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Title of Research</strong></td>
</tr>
<tr>
<td>Exfiltration Trenches for Post-Construction Storm Water Management for Linear Transportation projects</td>
</tr>
<tr>
<td>Vegetated Biofilter for Post-Construction Storm Water</td>
</tr>
<tr>
<td>Title of Research</td>
</tr>
<tr>
<td>---------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Management for Linear Transportation projects</td>
</tr>
<tr>
<td>Qualifying the effects of highway construction on the peak rate and volume of storm water runoff in rural and moderately urbanized watersheds</td>
</tr>
<tr>
<td>Evaluation and Analysis of Liquid Deicers for Winter Maintenance</td>
</tr>
<tr>
<td>Evaluation of the Effectiveness of Salt Neutralizers for Washing Snow and Ice Equipment</td>
</tr>
<tr>
<td>Procedures for Waste Management from Street Sweeping and Storm Water Systems</td>
</tr>
<tr>
<td>Alternative Stream Channel Maintenance at Bridge Crossings</td>
</tr>
<tr>
<td>The Value of Balanced Growth Plans for Transportation</td>
</tr>
<tr>
<td>Range Scale and costs of Climate Change Effects to ODOT</td>
</tr>
<tr>
<td>Targeted Climate Change Research Scan and Expert Outreach</td>
</tr>
<tr>
<td>Clear Roads</td>
</tr>
<tr>
<td>No Boundaries Roadway Maintenance Practices</td>
</tr>
</tbody>
</table>
4. **A summary of the storm water activities you plan to undertake during the next reporting cycle (including an implementation schedule);**

ODOT has included the upcoming year's proposed BMP activities as part of the BMP Tables in Section 2.0 of this Report.

5. **Proposed changes to your SWMP, including changes to any BMPs or any identified measurable goals that apply to the program elements;**

ODOT has summarized program BMP changes or revisions in Section 5 of this Report.

6. **Identify and summarize any variances granted under your storm water program regulations and requirements.**

No variances have been applied for or granted from the Ohio EPA MS4 Permit. ODOT maintains its status as a non-traditional MS4 entity and therefore, does not follow the permit where not applicable. Tools from the Federal MS4 Permit and AASHTO on effectively developing a DOT program have been utilized for Best Management Practice guidelines.
### 1.4 Public Information Officers (PIOs) - Storm Water Management Education and State/County Fair Displays

- **1.1 Publications**
  - Storm Drain Grate Stamping
  - ODOT Storm Water Web Site
  - External Training
- **1.2 Storm Drain Grate Stamping**
  - ODOT Web Site
  - ODOT Storm Water Brochure and Public Meetings
- **1.3 ODOT Storm Water Web Site**
  - ODOT Web Site
  - ODOT Storm Water Outfall Inventory and Mapping
- **1.4 ODOT Web Site**
  - ODOT Storm Water Web Site
  - Illicit Discharge Detection Investigations
- **1.5 General Storm Water Brochure**
  - General Storm Water Brochure
  - External Training
  - Annual Ohio Transportation Engineers Conference (OTEC)
  - Adopt-A-Highway and other public involvement/participation
- **1.6 General Storm Water Brochure**
  - External Training
  - Annual Ohio Transportation Engineers Conference (OTEC)
  - Adopt-A-Highway and other public involvement/participation
  - ODOT Web Site
  - ODOT Storm Water Outfall Inventory and Mapping
  - Illicit Discharge Detection Investigations
  - ODOT Storm Water Web Site
  - ODOT Web Site

### 3.1 Storm Water Outfall Inventory and Mapping

- **3.1b Statewide Inventory**
  - Statewide Inventory
  - Statewide Inventory
  - Statewide Inventory
  - Statewide Inventory
  - Statewide Inventory
- **3.2 Appropriate Permitting and Mapping of Non-Storm Water Systems (HSTS)**
  - Survey and complete map of Home Sewage Treatment Systems (HSTS)
  - Survey and complete map of Home Sewage Treatment Systems (HSTS)
  - Survey and complete map of Home Sewage Treatment Systems (HSTS)
  - Survey and complete map of Home Sewage Treatment Systems (HSTS)
  - Survey and complete map of Home Sewage Treatment Systems (HSTS)

### 4.1 Transportation Projects, Facilities Construction, Maintenance Activities, and TMDL's

- **4.2 Filter Strips for Overland Flow**
  - Filter Strips for Overland Flow
  - Filter Strips for Overland Flow
  - Filter Strips for Overland Flow
  - Filter Strips for Overland Flow
  - Filter Strips for Overland Flow
- **4.3 Sediment and Erosion Controls During Transportation Projects, Facilities Construction, and Maintenance Activities**
  - Sediment and Erosion Controls During Facilities Transportation Projects, Facilities Construction, and Maintenance Activities
  - Sediment and Erosion Controls During Facilities Transportation Projects, Facilities Construction, and Maintenance Activities
  - Sediment and Erosion Controls During Facilities Transportation Projects, Facilities Construction, and Maintenance Activities
  - Sediment and Erosion Controls During Facilities Transportation Projects, Facilities Construction, and Maintenance Activities
  - Sediment and Erosion Controls During Facilities Transportation Projects, Facilities Construction, and Maintenance Activities

### 5.1 Grass Swales/Drainage ditches

- **5.2 Exfiltration Trench**
  - Exfiltration Trench
  - Exfiltration Trench
  - Exfiltration Trench
  - Exfiltration Trench
  - Exfiltration Trench
- **5.3 Manufactured Systems**
  - Manufactured Systems
  - Manufactured Systems
  - Manufactured Systems
  - Manufactured Systems
  - Manufactured Systems
- **5.4 Vegetated Biofilter**
  - Vegetated Biofilter
  - Vegetated Biofilter
  - Vegetated Biofilter
  - Vegetated Biofilter
  - Vegetated Biofilter
- **5.5 Post-Construction Technology Evaluation Program**
  - Post-Construction Technology Evaluation Program
  - Post-Construction Technology Evaluation Program
  - Post-Construction Technology Evaluation Program
  - Post-Construction Technology Evaluation Program
  - Post-Construction Technology Evaluation Program
- **5.6 Exfiltration Trench**
  - Exfiltration Trench
  - Exfiltration Trench
  - Exfiltration Trench
  - Exfiltration Trench
  - Exfiltration Trench
- **5.7 State Architect’s Office Requirements – Office of Facilities**
  - State Architect’s Office Requirements – Office of Facilities
  - State Architect’s Office Requirements – Office of Facilities
  - State Architect’s Office Requirements – Office of Facilities
  - State Architect’s Office Requirements – Office of Facilities
  - State Architect’s Office Requirements – Office of Facilities
- **5.8 Infiltration Type BMPs**
  - Infiltration Type BMPs
  - Infiltration Type BMPs
  - Infiltration Type BMPs
  - Infiltration Type BMPs
  - Infiltration Type BMPs
- **5.9 Constructed Wetlands**
  - Constructed Wetlands
  - Constructed Wetlands
  - Constructed Wetlands
  - Constructed Wetlands
  - Constructed Wetlands
- **5.10 State Architect’s Office Requirements – Office of Facilities**
  - State Architect’s Office Requirements – Office of Facilities
  - State Architect’s Office Requirements – Office of Facilities
  - State Architect’s Office Requirements – Office of Facilities
  - State Architect’s Office Requirements – Office of Facilities
  - State Architect’s Office Requirements – Office of Facilities

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

- **6.2 Pollution Prevention/Good Housekeeping at ODOT**
  - Pollution Prevention/Good Housekeeping at ODOT
  - Pollution Prevention/Good Housekeeping at ODOT
  - Pollution Prevention/Good Housekeeping at ODOT
  - Pollution Prevention/Good Housekeeping at ODOT
  - Pollution Prevention/Good Housekeeping at ODOT
- **6.3 In Field Vehicle Fueling**
  - In Field Vehicle Fueling
  - In Field Vehicle Fueling
  - In Field Vehicle Fueling
  - In Field Vehicle Fueling
  - In Field Vehicle Fueling
- **6.4 In Field Maintenance/Management of Storm Water BMPs**
  - In Field Maintenance/Management of Storm Water BMPs
  - In Field Maintenance/Management of Storm Water BMPs
  - In Field Maintenance/Management of Storm Water BMPs
  - In Field Maintenance/Management of Storm Water BMPs
  - In Field Maintenance/Management of Storm Water BMPs
- **6.5 Vehicle Maintenance (Wash water recycling, vehicle washing)***
  - Vehicle Maintenance (Wash water recycling, vehicle washing)
  - Vehicle Maintenance (Wash water recycling, vehicle washing)
  - Vehicle Maintenance (Wash water recycling, vehicle washing)
  - Vehicle Maintenance (Wash water recycling, vehicle washing)
  - Vehicle Maintenance (Wash water recycling, vehicle washing)
- **6.6 Spill Response Clean up and Disposal**
  - Spill Response Clean up and Disposal
  - Spill Response Clean up and Disposal
  - Spill Response Clean up and Disposal
  - Spill Response Clean up and Disposal
  - Spill Response Clean up and Disposal

### Notes

The explanation and rationale of each change in BMP name and content is documented within the Annual Report from that same year.
Stormwater Management Program
Table of Program Implementation
March 2014

Office of Hydraulic Engineering
Office Administrator: Jeffery Dyer, P.E.
614-272-1173
Assistant Administrator: Becky Humphreys, P.E.
614-387-1125

Hydraulic Engineering

- Construction Administration (MCM 1,4)
- Roadway Engineering (MCM 3)
- Maintenance Administration (MCM 1,2,4,5,6)
- Training (MCM 1,2)
- Facilities (MCM 4,6)
- LTAP (MCM 1,2)
- Statewide Planning & Research (MCM 2)
- Environmental Services (MCM 1,2,4,5,6)

Central Office

- Stormwater Management Program Manager: Becky Humphreys, P.E.
  Email: becky.humphreys@dot.state.oh.us
  Phone: 614-387-1125

Hydraulic Engineering

- Maintains S832 for temporary E&S on ODOT construction projects, CMS & MOP
- Maintains specification for post-construction BMPs – L&D Vol 2 & 3
- Maintains procedures for R/W Use Permits
- Maintains maintenance & operation policies and E&S on maintenance projects outside facilities
- Manages and tracks ODOT employee internal training
- Maintains all facility/equipment policies & operations
- Provides public outreach to ODOT audiences through MCM training sessions
- Provides stormwater and water quality research
- Maintains environmental policies and training for project level compliance with environmental permits through

Regulatory liaison for construction

District Construction Administrator (MCM 4)

- District Construction Administrator
  - Acceptance of SWPPP & contract implementation of S832
  - Oversight of Area Engineer & Project Engineer implementing S832 on construction projects

District Environmental Coordinator (MCM 1,4,5,6)

- District Environmental Coordinator
  - Overall project environmental compliance & environmental permit coordination
  - Construction projects
  - Maintenance & operation compliance
  - District facility ECOs

District Maintenance Engineer

- District Maintenance Engineer
  - Reviews, accepts, and maintains R/W Use Permits
  - Maintains district compliance on project (facility) including employee training associated w/ HR waste & solid waste
  - Manages all maintenance and operation activities in District
  - Manages individual facility daily operations including SPCC implementation

Management/coordination of maintenance projects for:
- Stormwater system inspection/maintenance
- Post-construction BMPs maintenance
- Coordinates maintenance projects
- Responds to public SW requests
- Winter Weather Operations

County Manager

- County Manager
  - Stormwater Planning
  - Post-construction BMPs

District Environmental Coordinator

- District Environmental Coordinator
  - NEPA Compliance
  - SPCC/WVPPP

Environmental Training

404/401 Permits

Facility Manager (MCM 6)

- Facility Manager (MCM 6)
  - Post-construction BMPs

Environmental Services Coordinator

- Environmental Services Coordinator
  - Facility EC/FP: Develop SPCC plans

Stormwater Management Program Program Implementation
March 2014

The SWMP maintains program development of all MCMs in connection with Central Office & District personnel. The chart indicates Offices and their responsibilities to the SWMP.
Appendix D
MS4 Permit
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 7 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 payment of applicable fees, submittal of a complete NOI Application form and storm water management program (SWMP), and written approval of coverage from the director of Ohio EPA.

Laura H. Powell
Assistant Director

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.

By [Signature] Date: 1-29-09
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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 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 under 40 CFR §122.32(a)(1) to obtain coverage under this permit, then you were required to submit an NOI and your SWMP or apply for an individual permit by March 10, 2003.

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

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  
50 West Town Street, Suite 700  
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;

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 selected each of the BMPs and measurable goals for your SWMP. You shall develop and implement your program within five years of initially being granted Small MS4 general permit coverage unless a more accelerated timeframe is specified.
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., 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., 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 rational 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. Within five years of when your coverage under this
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 identify 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 rational 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 HSTSSs and off-lot discharging HSTSSs) 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) provide schedules for elimination of illicit connections that have been identified but have yet to be eliminated 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: OHC000003, OHCD000001 and OHCO000001. If you initially had coverage under a 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 and percentage 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 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. If you initially had coverage under a previous version of this permit you shall revise your program to satisfy these performance standards, if needed, within two years of when your coverage under this general permit was granted.

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: OHC000003, OHCD00001 and OHCO00001. If you initially had coverage under a 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: 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: 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 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. If you initially had coverage under a previous version of this permit you shall revise your program to satisfy these performance standards, if needed, within two years of when your coverage under this general permit was granted.

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’s 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 EPA 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 (OHR000004). If you initially had coverage under a previous version of this permit you shall develop and implement SWP3s for these facilities, if needed, within two years of when your coverage under this general permit was granted.

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 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.

   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 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 a previous version of this permit you shall submit your 2008 annual report by the required due date of that previous generation permit. The first report required by this permit is due April 1, 2010. 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;

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.

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 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 the 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 CWA, any substances or parameters at any location.

K. Permit Actions

This permit may be modified, revoked and reissued, or terminated for cause.

L. Permit Transfers

Permit transfers shall be in accordance with OAC 3745-38-09.

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.

**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://www.epa.state.oh.us/dsw/rules/laws.html](http://www.epa.state.oh.us/dsw/rules/laws.html)

Please see the following web site for Storm Water Program forms and other guidance documents associated with this general permit:  [http://www.epa.state.oh.us/dsw/storm/index.html](http://www.epa.state.oh.us/dsw/storm/index.html)

**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.

**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.


**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.

**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 authorised 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.”

“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 E - Internal and External Training

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## Appendix E - Internal and External Training

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<tr>
<td></td>
<td>1/23/2013</td>
<td>16 Employees</td>
<td></td>
</tr>
<tr>
<td></td>
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<td>19 Employees</td>
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</tr>
<tr>
<td></td>
<td>1/29/2013</td>
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<td></td>
</tr>
<tr>
<td></td>
<td>3/1/2013</td>
<td>5 Employees</td>
<td></td>
</tr>
<tr>
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<td>3/3/2013</td>
<td>3 Employees</td>
<td></td>
</tr>
<tr>
<td></td>
<td>3/4/2013</td>
<td>5 Employees</td>
<td></td>
</tr>
<tr>
<td></td>
<td>3/7/2013</td>
<td>11 Employees</td>
<td></td>
</tr>
<tr>
<td></td>
<td>3/8/2013</td>
<td>4 Employees</td>
<td></td>
</tr>
<tr>
<td></td>
<td>10/2/2013</td>
<td>20 Employees</td>
<td></td>
</tr>
<tr>
<td></td>
<td>10/4/2013</td>
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</tr>
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<td>10/10/2013</td>
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<tr>
<td></td>
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</tr>
<tr>
<td></td>
<td>10/17/2013</td>
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<tr>
<td></td>
<td>10/21/2013</td>
<td>25 Employees</td>
<td></td>
</tr>
</tbody>
</table>
# Appendix E - Internal and External Training

<table>
<thead>
<tr>
<th>Course</th>
<th>Dates</th>
<th>Attendance</th>
<th>Intended Audience</th>
</tr>
</thead>
<tbody>
<tr>
<td>Snow and Ice Refresher</td>
<td>10/22/2013</td>
<td>35 Employees</td>
<td>Employees</td>
</tr>
<tr>
<td></td>
<td>10/23/2013</td>
<td>28 Employees</td>
<td>Employees</td>
</tr>
<tr>
<td></td>
<td>10/24/2013</td>
<td>54 Employees</td>
<td>Employees</td>
</tr>
<tr>
<td></td>
<td>10/25/2013</td>
<td>12 Employees</td>
<td>Employees</td>
</tr>
<tr>
<td></td>
<td>10/28/2013</td>
<td>42 Employees</td>
<td>Employees</td>
</tr>
<tr>
<td></td>
<td>10/29/2013</td>
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<td>Employees</td>
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<td>10/30/2013</td>
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<td>10/31/2013</td>
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<td></td>
<td>11/1/2013</td>
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<td>Employees</td>
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<td></td>
<td>11/4/2013</td>
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</tr>
<tr>
<td></td>
<td>11/5/2013</td>
<td>45 Employees</td>
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</tr>
<tr>
<td></td>
<td>11/6/2013</td>
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<td>Employees</td>
</tr>
<tr>
<td></td>
<td>11/7/2013</td>
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<td>Employees</td>
</tr>
<tr>
<td></td>
<td>11/8/2013</td>
<td>46 Employees</td>
<td>Employees</td>
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<tr>
<td></td>
<td>11/12/2013</td>
<td>51 Employees</td>
<td>Employees</td>
</tr>
<tr>
<td></td>
<td>11/13/2013</td>
<td>63 Employees</td>
<td>Employees</td>
</tr>
<tr>
<td></td>
<td>11/18/2013</td>
<td>6 Employees</td>
<td>Employees</td>
</tr>
<tr>
<td></td>
<td>11/19/2013</td>
<td>2 Employees</td>
<td>Employees</td>
</tr>
<tr>
<td></td>
<td>11/20/2013</td>
<td>54 Employees</td>
<td>Employees</td>
</tr>
<tr>
<td></td>
<td>11/21/2013</td>
<td>51 Employees</td>
<td>Employees</td>
</tr>
<tr>
<td></td>
<td>11/22/2013</td>
<td>19 Employees</td>
<td>Employees</td>
</tr>
<tr>
<td></td>
<td>11/26/2013</td>
<td>43 Employees</td>
<td>Employees</td>
</tr>
<tr>
<td></td>
<td>12/3/2013</td>
<td>1 Employees</td>
<td>Employees</td>
</tr>
<tr>
<td></td>
<td>12/5/2013</td>
<td>2 Employees</td>
<td>Employees</td>
</tr>
<tr>
<td></td>
<td>12/6/2013</td>
<td>2 Employees</td>
<td>Employees</td>
</tr>
<tr>
<td></td>
<td>12/16/2013</td>
<td>5 Employees</td>
<td>Employees</td>
</tr>
<tr>
<td></td>
<td>12/23/2013</td>
<td>3 Employees</td>
<td>Employees</td>
</tr>
<tr>
<td></td>
<td>12/27/2013</td>
<td>3 Employees</td>
<td>Employees</td>
</tr>
<tr>
<td>Snow and Ice/Loader Refresher</td>
<td>2/21/2013</td>
<td>2 Employees</td>
<td>Employees</td>
</tr>
<tr>
<td></td>
<td>12/3/2013</td>
<td>11 Employees</td>
<td>Employees</td>
</tr>
<tr>
<td></td>
<td>12/12/2013</td>
<td>15 Employees</td>
<td>Employees</td>
</tr>
<tr>
<td></td>
<td>12/16/2013</td>
<td>4 Employees</td>
<td>Employees</td>
</tr>
<tr>
<td></td>
<td>12/18/2013</td>
<td>20 Employees</td>
<td>Employees</td>
</tr>
<tr>
<td></td>
<td>1/1/2014</td>
<td>2 Employees</td>
<td>Employees</td>
</tr>
</tbody>
</table>

## Research Project Updates

| EXFILTRATION TRENCHES - Research | SWMP Involvement | 10/23/2013 | 30 OTEC |

## Office of Environmental Services Trainings

<table>
<thead>
<tr>
<th>Categorical Exclusion</th>
<th>SWMP Involvement</th>
<th>5/13/2013</th>
<th>27 Employees, Consultants</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>10/29/2013</td>
<td>23 Employees, Consultants</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Managing the Environmental and Project Development Process (NEPA)</th>
<th>SWMP Involvement</th>
<th>2/4/2013</th>
<th>16 Consultants</th>
</tr>
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<tbody>
<tr>
<td></td>
<td></td>
<td>9/9/2013</td>
<td>18 Consultants</td>
</tr>
<tr>
<td></td>
<td></td>
<td>10/7/2013</td>
<td>18 Consultants</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Ecological Training</th>
<th>SWMP Involvement</th>
<th>8/6/2013</th>
<th>27 Consultants</th>
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<tbody>
<tr>
<td></td>
<td></td>
<td>10/29/2013</td>
<td>23 Consultants</td>
</tr>
</tbody>
</table>
## Appendix E - Internal and External Training

<table>
<thead>
<tr>
<th>Course</th>
<th>Dates</th>
<th>Attendance</th>
<th>Intended Audience</th>
</tr>
</thead>
<tbody>
<tr>
<td>Waterway Permits Training</td>
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<td>Consultants</td>
</tr>
<tr>
<td></td>
<td>10/3/2013</td>
<td>18</td>
<td>Consultants</td>
</tr>
<tr>
<td>Environmental Updates</td>
<td>6/25/2013</td>
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<td>Employees</td>
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<tr>
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<td>12/12/2013</td>
<td>88</td>
<td>Employees</td>
</tr>
<tr>
<td>District Environmental Coordinator Training (E&amp;S Training)</td>
<td>6/11/2013</td>
<td>12</td>
<td>Employees</td>
</tr>
<tr>
<td></td>
<td>12/10/2013</td>
<td>12</td>
<td>Employees</td>
</tr>
<tr>
<td>District Environmental Coordinator Training (E&amp;S Training-field)</td>
<td>9/19/2012</td>
<td>7</td>
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<td>District Environmental Coordinator Update</td>
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<td>19</td>
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<td></td>
<td>12/4/2012</td>
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<td>Employees</td>
</tr>
<tr>
<td>Tanks, Product and Waste Management Conference</td>
<td>4/10/2012</td>
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<td>Employees</td>
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<td>SPCC Spill Prevention, Control, and Countermeasures Plan</td>
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<td></td>
<td>12/2/2013</td>
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<td>12/16/2013</td>
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</tr>
<tr>
<td></td>
<td>12/30/2013</td>
<td>3</td>
<td>Employees</td>
</tr>
</tbody>
</table>

Totals shown here do not break down the intended audience totals. These totals include Central Office coordinated training courses and do not include District level training courses that may have occurred. Some course content that are shown may or may not have consistent messages towards water quality improvements. Course content was developed with water quality improvement topics, but have not been reviewed by the SWMP. The content may vary depending on instructor and intended messages. Only classes that have SWM Program involvement shown, have oversight of water quality improvement messages.
<table>
<thead>
<tr>
<th>Adopt A Highway Program</th>
<th>Bags Removed by Participants</th>
<th>Estimated # of Participants</th>
<th>Total Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>25,499</td>
<td>15,373</td>
<td>$146,245</td>
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</table>

<table>
<thead>
<tr>
<th>Deer Removal</th>
<th>Deer/Carcasses Removed by ODOT</th>
<th>Total Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>14,681</td>
<td>$661,316</td>
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</table>

<table>
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<tr>
<th>Department of Corrections</th>
<th>Bags Removed by DRC</th>
<th>Total Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>62,257</td>
<td>$176,581</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>ODOT Forces</th>
<th>Bags Removed by ODOT</th>
<th>Total Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>279,123</td>
<td>$3,571,096</td>
</tr>
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</table>
### 2013 Right of Way Permit Use Permits Summary

<table>
<thead>
<tr>
<th>District</th>
<th>All permits involving drainage(^1)</th>
<th>Permits for off-lot wastewater treatment systems</th>
<th>Permits for discharges with a NPDES permit</th>
<th>Non-permitted illegally connected discharges</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>25</td>
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</tr>
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<td>8</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td>6</td>
<td>0(^2)</td>
<td>0(^2)</td>
<td>0(^3)</td>
<td>0(^2)</td>
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<tr>
<td>7</td>
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<td>0</td>
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</tr>
<tr>
<td>9</td>
<td>0(^2)</td>
<td>0(^2)</td>
<td>0(^2)</td>
<td>0(^2)</td>
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<td>1</td>
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<td>6</td>
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<td>0</td>
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<td>TOTALS</td>
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<td>5</td>
<td>0</td>
<td></td>
</tr>
</tbody>
</table>

\(^1\)Drainage permits are only to include those permits for discharge, not to include ditch enclosure (pipes).

\(^2\)Information was not available from District(s) at time of publication.
### District 1

#### 2013 Right of Way Permit Use Permits Summary

<table>
<thead>
<tr>
<th>Total # of Permits Issued:</th>
<th>25</th>
</tr>
</thead>
<tbody>
<tr>
<td>All permits involving drainage (storm water, treated sanitary, curtain drains, outlet tiles, etc.)</td>
<td>All drainage permits issued in District one, were for grading existing ditches, outleting to our existing CB’s, tiles or open ditches. We had nothing that would qualify under the other criteria.</td>
</tr>
<tr>
<td>Permits for off-lot wastewater treatment systems. An &quot;off-lot&quot; wastewater treatment system discharges treated sanitary wastewater through a pipe into the right of way (ditch) instead of allowing the wastewater to infiltrate into the ground through a leach field. Permits involving curtain drains should not be included.</td>
<td>Comments:</td>
</tr>
<tr>
<td>Permits for discharges with a NPDES permit. An NPDES permit is issued by Ohio EPA for certain wastewater or storm water discharges. If a home septic tank is new or being replaced and it discharges &quot;off-lot&quot; as described above, then an NPDES permit is needed (permit no OHK 000001).</td>
<td>Comments:</td>
</tr>
<tr>
<td>Permits for illegally connected discharges. Discharges discovered and then issued a permit.</td>
<td>Comments:</td>
</tr>
</tbody>
</table>

### Location Information:

(Purpose is to map discharges. Provide street address and, if known, the coordinates (latitude/longitude))

<table>
<thead>
<tr>
<th>Off-lot wastewater treatment systems:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Discharges with a NPDES permit:</th>
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<tbody>
<tr>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Illegally connected discharges:</th>
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</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>
## District 2

### 2013 Right of Way Permit Use Permits Summary

<table>
<thead>
<tr>
<th>Total # of Permits Issued:</th>
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</tr>
</thead>
<tbody>
<tr>
<td><strong>All permits involving drainage</strong> (storm water, treated sanitary, curtain drains, outlet tiles, etc.)</td>
<td>19</td>
</tr>
<tr>
<td><strong>Permits for off-lot wastewater treatment systems.</strong> An &quot;off-lot&quot; wastewater treatment system discharges treated sanitary wastewater through a pipe into the right of way (ditch) instead of allowing the wastewater to infiltrate into the ground through a leach field. Permits involving curtain drains should not be included.</td>
<td>0</td>
</tr>
<tr>
<td><strong>Permits for discharges with a NPDES permit.</strong> An NPDES permit is issued by Ohio EPA for certain wastewater or storm water discharges. If a home septic tank is new or being replaced and it discharges &quot;off-lot&quot; as described above, then an NPDES permit is needed (permit no OHK 000001).</td>
<td>0</td>
</tr>
<tr>
<td><strong>Permits for illegally connected discharges.</strong> Discharges discovered and then issued a permit.</td>
<td>0</td>
</tr>
</tbody>
</table>

### Location Information:

(Purpose is to map discharges. Provide street address and, if known, the coordinates (latitude/longitude))

**Off-lot wastewater treatment systems:**

<p>| |</p>
<table>
<thead>
<tr>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
</tbody>
</table>

**Discharges with a NPDES permit:**

<p>| |</p>
<table>
<thead>
<tr>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
</tbody>
</table>

**Illegally connected discharges:**

<p>| |</p>
<table>
<thead>
<tr>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
</tbody>
</table>
All permits involving drainage (storm water, treated sanitary, curtain drains, outlet tiles, etc.)

Permits for off-lot wastewater treatment systems. An "off-lot" wastewater treatment system discharges treated sanitary wastewater through a pipe into the right of way (ditch) instead of allowing the wastewater to infiltrate into the ground through a leach field. Permits involving curtain drains should not be included.

Permits for discharges with a NPDES permit. An NPDES permit is issued by Ohio EPA for certain wastewater or storm water discharges. If a home septic tank is new or being replaced and it discharges "off-lot" as described above, then an NPDES permit is needed (permit no OHK 000001).

Permits for illegally connected discharges. Discharges discovered and then issued a permit.

Location Information:
(Purpose is to map discharges. Provide street address and, if known, the coordinates (latitude/longitude))

<table>
<thead>
<tr>
<th>Storm Water Discharge:</th>
</tr>
</thead>
<tbody>
<tr>
<td>ERIE COUNTY</td>
</tr>
<tr>
<td>9213 River Road, Huron 44839 SR 13 SLM 4.6</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>MEDINA COUNTY</th>
</tr>
</thead>
<tbody>
<tr>
<td>2325 Medina Road Medina 44256 SR 18 SLM 16.77</td>
</tr>
</tbody>
</table>

| SR 57 SML 1.79 Wadsworth 44281 |

| 5980 Ashland Road Wooster 44691 US 250 SLM 5.3 |

<table>
<thead>
<tr>
<th>Off-lot wastewater treatment systems:</th>
</tr>
</thead>
<tbody>
<tr>
<td>HURON COUNTY</td>
</tr>
<tr>
<td>Location</td>
</tr>
<tr>
<td>----------------------------------</td>
</tr>
<tr>
<td><strong>2744 US 224 Willard (New Haven) 44890 US 224 SLM 44890</strong></td>
</tr>
<tr>
<td><strong>LORAIN COUNTY</strong></td>
</tr>
<tr>
<td><strong>Discharges with a NPDES permit:</strong></td>
</tr>
<tr>
<td><strong>WAYNE COUNTY</strong></td>
</tr>
<tr>
<td><strong>Illegally connected discharges:</strong></td>
</tr>
<tr>
<td><strong>NONE</strong></td>
</tr>
</tbody>
</table>
### District 4
#### 2013 Right of Way Permit Use Permits Summary

<table>
<thead>
<tr>
<th>Total # of Permits Issued:</th>
</tr>
</thead>
<tbody>
<tr>
<td>All permits involving drainage (storm water, treated sanitary, curtain drains, outlet tiles, etc.)</td>
</tr>
<tr>
<td>Permits for off-lot wastewater treatment systems. An &quot;off-lot&quot; wastewater treatment system discharges treated sanitary wastewater through a pipe into the right of way (ditch) instead of allowing the wastewater to infiltrate into the ground through a leach field. Permits involving curtain drains should not be included.</td>
</tr>
<tr>
<td>Permits for discharges with a NPDES permit. An NPDES permit is issued by Ohio EPA for certain wastewater or storm water discharges. If a home septic tank is new or being replaced and it discharges &quot;off-lot&quot; as described above, then an NPDES permit is needed (permit no OHK 000001).</td>
</tr>
<tr>
<td>Permits for illegally connected discharges. Discharges discovered and then issued a permit.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Location Information:</th>
</tr>
</thead>
<tbody>
<tr>
<td>(Purpose is to map discharges. Provide street address and, if known, the coordinates (latitude/longitude))</td>
</tr>
<tr>
<td>Off-lot wastewater treatment systems:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Discharges with a NPDES permit:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chris Mullens</td>
</tr>
<tr>
<td>2532 Ravenna Ave NE</td>
</tr>
<tr>
<td>Canton OH  44730   NPDES  3GK04202'AG</td>
</tr>
</tbody>
</table>

| Illegally connected discharges: |
### District 5
2013 Right of Way Permit Use Permits Summary

<table>
<thead>
<tr>
<th>Total # of Permits Issued:</th>
<th>8</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>All permits involving drainage</strong> (storm water, treated sanitary, curtain drains, outlet tiles, etc.)</td>
<td>Comments: issued 8, but only 7 were constructed (all Storm Water except 1 which was dewatering outlet).</td>
</tr>
<tr>
<td><strong>Permits for off-lot wastewater treatment systems.</strong> An &quot;off-lot&quot; wastewater treatment system discharges treated sanitary wastewater through a pipe into the right of way (ditch) instead of allowing the wastewater to infiltrate into the ground through a leach field. Permits involving curtain drains should not be included.</td>
<td>0</td>
</tr>
<tr>
<td><strong>Permits for discharges with a NPDES permit.</strong> An NPDES permit is issued by Ohio EPA for certain wastewater or storm water discharges. If a home septic tank is new or being replaced and it discharges &quot;off-lot&quot; as described above, then an NPDES permit is needed (permit no OHK 000001).</td>
<td>0</td>
</tr>
<tr>
<td><strong>Permits for illegally connected discharges.</strong> Discharges discovered and then issued a permit.</td>
<td>0</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Location Information:</th>
</tr>
</thead>
<tbody>
<tr>
<td>(Purpose is to map discharges. Provide street address and, if known, the coordinates (latitude/longitude))</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Off-lot wastewater treatment systems:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Discharges with a NPDES permit:</td>
</tr>
<tr>
<td>Illegally connected discharges:</td>
</tr>
</tbody>
</table>
### District 7
#### 2013 Right of Way Permit Use Permits Summary

<table>
<thead>
<tr>
<th>Total # of Permits Issued:</th>
</tr>
</thead>
<tbody>
<tr>
<td>All permits involving drainage (storm water, treated sanitary, curtain drains, outlet tiles, etc.)</td>
</tr>
</tbody>
</table>

**Permits for off-lot wastewater treatment systems.** An "off-lot" wastewater treatment system discharges treated sanitary wastewater through a pipe into the right of way (ditch) instead of allowing the wastewater to infiltrate into the ground through a leach field. Permits involving curtain drains should not be included.

**Permits for discharges with a NPDES permit.** An NPDES permit is issued by Ohio EPA for certain wastewater or storm water discharges. If a home septic tank is new or being replaced and it discharges "off-lot" as described above, then an NPDES permit is needed (permit no OHK 000001).

**Permits for illegally connected discharges.** Discharges discovered and then issued a permit.

---

**Location Information:**
(Purpose is to map discharges. Provide street address and, if known, the coordinates (latitude/longitude))

**Off-lot wastewater treatment systems:**

**Discharges with a NPDES permit:**

**Illegally connected discharges:**
### District 8
#### 2013 Right of Way Permit Use Permits Summary

<table>
<thead>
<tr>
<th>Category</th>
<th>Permits Issued</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>All permits involving drainage (storm water, treated sanitary, curtain drains, outlet tiles, etc.)</td>
<td>10</td>
<td>4 storm, 1 outlet, 5 sanitary</td>
</tr>
<tr>
<td>Permits for off-lot wastewater treatment systems. An &quot;off-lot&quot; wastewater treatment system discharges treated sanitary wastewater through a pipe into the right of way (ditch) instead of allowing the wastewater to infiltrate into the ground through a leach field. Permits involving curtain drains should not be included.</td>
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<td>Comments:</td>
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<td>0</td>
<td>Comments:</td>
</tr>
<tr>
<td>Permits for illegally connected discharges. Discharges discovered and then issued a permit.</td>
<td>0</td>
<td>Comments:</td>
</tr>
</tbody>
</table>

#### Location Information:
(Purpose is to map discharges. Provide street address and, if known, the coordinates (latitude/longitude))

| Off-lot wastewater treatment systems: | |
|--------------------------------------| |
| Discharges with a NPDES permit:      | |
| Illegally connected discharges:      | |

Total # of Permits Issued: **869**
**District 10**

**2013 Right of Way Permit Use Permits Summary**

<table>
<thead>
<tr>
<th>Total # of Permits Issued:</th>
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</thead>
</table>

<table>
<thead>
<tr>
<th>All permits involving drainage  (storm water, treated sanitary, curtain drains, outlet tiles, etc.)</th>
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<tr>
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<tr>
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<th>1</th>
<th>Comments:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Permits for illegally connected discharges. Discharges discovered and then issued a permit.</th>
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<th>Comments:</th>
</tr>
</thead>
</table>

**Location Information:**

(Purpose is to map discharges. Provide street address and, if known, the coordinates (latitude/longitude))

**Off-lot wastewater treatment systems:**

**Discharges with a NPDES permit:**

Toral Wimer - 12333 SR 93N Logan, Ohio 43138 / (740) 380-2747

**Illegally connected discharges:**
All permits involving drainage (storm water, treated sanitary, curtain drains, outlet tiles, etc.)

Permits for off-lot wastewater treatment systems. An "off-lot" wastewater treatment system discharges treated sanitary wastewater through a pipe into the right of way (ditch) instead of allowing the wastewater to infiltrate into the ground through a leach field. Permits involving curtain drains should not be included.

Permits for discharges with a NPDES permit. An NPDES permit is issued by Ohio EPA for certain wastewater or storm water discharges. If a home septic tank is new or being replaced and it discharges "off-lot" as described above, then an NPDES permit is needed (permit no OHK 000001).

Permits for illegally connected discharges. Discharges discovered and then issued a permit.

<table>
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<tr>
<th>Location Information:</th>
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<td>Total # of Permits Issued:</td>
<td><img src="image" alt="Table" /></td>
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<tr>
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<td>3</td>
</tr>
<tr>
<td>Permits for illegally connected discharges. Discharges discovered and then issued a permit.</td>
<td><img src="image" alt="Comments" /></td>
</tr>
</tbody>
</table>

Location Information:
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Off-lot wastewater treatment systems:

Discharges with a NPDES permit:
CAR-9-13.00
BEL-250-4.81
CAR-9-15.94

Illegally connected discharges:
### District 12
#### 2013 Right of Way Permit Use Permits Summary

| Total # of Permits Issued: |  
| All permits involving drainage (storm water, treated sanitary, curtain drains, outlet tiles, etc.) | 6 | Comments: 010G13, 147CW13, 204G13, 206CW13, 286CI13, 331G13  
| Permits for off-lot wastewater treatment systems. An "off-lot" wastewater treatment system discharges treated sanitary wastewater through a pipe into the right of way (ditch) instead of allowing the wastewater to infiltrate into the ground through a leach field. Permits involving curtain drains should not be included. | 0 | Comments:  
| Permits for discharges with a NPDES permit. An NPDES permit is issued by Ohio EPA for certain wastewater or storm water discharges. If a home septic tank is new or being replaced and it discharges "off-lot" as described above, then an NPDES permit is needed (permit no OHK 000001). | 0 | Comments:  
| Permits for illegally connected discharges. Discharges discovered and then issued a permit. | 0 | Comments:  

### Location Information:
(Purpose is to map discharges. Provide street address and, if known, the coordinates (latitude/longitude))

| Off-lot wastewater treatment systems: |  
| Discharges with a NPDES permit: |  
| Illegally connected discharges: |  

Not sure if these pertain to what you are looking for:
<table>
<thead>
<tr>
<th>Permit</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>010G13/Geauga County Engineers</td>
<td>To install one (1) CB 2-3 Catch Basin, one (1) Headwall (HW-4B) and 20 L.F. of 15” diameter HDPE culvert pipe on the southeast corner of SR 168 and Shedd Road in Troy Township, per attached plans. The HW-4B Headwall shall be placed at the upstream, daylighted end of the pipe. Work to be performed in Geauga County along the east side of SR 168, south of Shedd Road.</td>
</tr>
<tr>
<td>137CW13/Nestly Research &amp; Development</td>
<td>To install 30 L.F. of 12” PVC storm sewer pipes, temporary rock check dam and ½ headwall along US 422 eastbound right-of-way, as per the attached plan sheets. The temporary rock check dam shall be removed after the job is complete. Storm drainage shall be detained on the Permittee’s property and released into the US 422 drainage system at the pre-development rate. US 422 eastbound at Cannon Road.</td>
</tr>
<tr>
<td>204G13/Clinton C. Miller</td>
<td>To replace 100 L.F. of 12” diameter Type-C culvert pipe at 14410 Main Market Road (Parcel #32-045900), Troy Township per attached plan. One 2-2B Catch Basin shall be installed on the east side of the residential driveway. Work to be performed in Geauga County along the north side of USR 422, 600 feet east of Jug Road.</td>
</tr>
<tr>
<td>205CW13/City of Solon and Nestly Research &amp; Development</td>
<td>To excavate Cannon Road for approximately +/- 460’ under US 422’s overpass (SFN 1814885(L) &amp; 1814893(R), CUY-422-1597, L &amp; R) placing one 6” diameter forcemain and removing the existing 4” diameter forcemain along the south side of Cannon Road, per attached plans. Nestle Research &amp; Development will be installing the line. The City of Solon shall inspect and approve the proposed forcemain line before ownership is turned over to the City of Solon. Work to be performed in Cuyahoga County under US 422 at Cannon Road.</td>
</tr>
<tr>
<td>286CI13/Northeast Ohio Regional Sewer District</td>
<td>To install a sewage flow regulating and drop structure near I-480WB/SR 176 SB ramp, located on the north side of I-480, approximately 0.4 miles east of Broadview Road between the West 12th and 13th Street cul-de-sacs, and on the north side of the sound barrier. The installation will be a baffle-style drop structure that will direct sewage flow from an existing 66” sewer owned and maintained by the City of Cleveland to an existing 114” interceptor sewer owned and maintained by the NEORSD. The flow regulating structure is a chamber with an outside dimension of 15.5’x16.5’ (horizontal) and 14’ (vertical) that intercepts a 66” diameter sewer owned and maintained by the City of Cleveland. Work to be performed in Cuyahoga County along I-480 at SR 176 intersection.</td>
</tr>
</tbody>
</table>
331G13, Geauga County Water Resource: To install approximately 60 L.F. of 10" PVC (SDR 26) sewer at 0.28% in a 20" steel casing, by directionally drilling under SR 306, for Russell Township Sanitary Sewer Extension, as per attached plan sheets. The 10" PVC sewer line shall be installed longitudinally along the north side of Kinsman Road (SR 87) and along the east side of SR 306, within the proposed 22' sanitary easement. Work to be performed in Geauga County under SR 306, 50 feet north of Kinsman Road (SR 87).

All these permits are in ODOT D-12 Plan Index if you would like to see them.
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