

Ohio EPA Storm Water Seminar

MS4 Evaluations

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NPDES Small MS4 Storm Water Update

Phase I MS4s

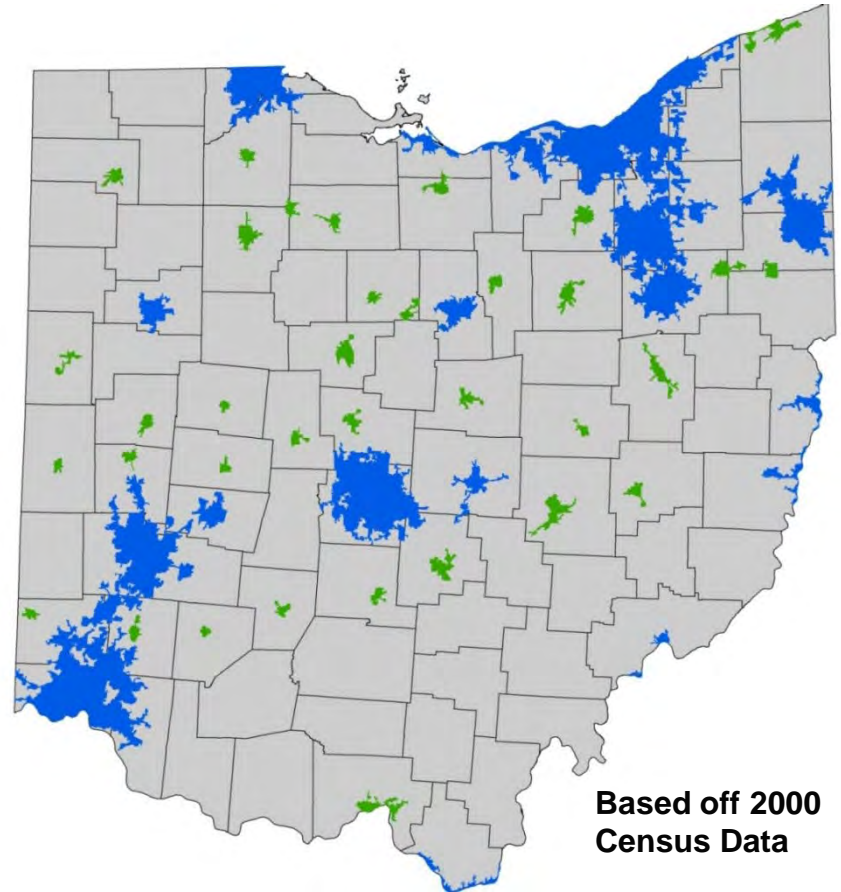
“Medium & Large MS4s

Akron, Columbus, Dayton &
Toledo

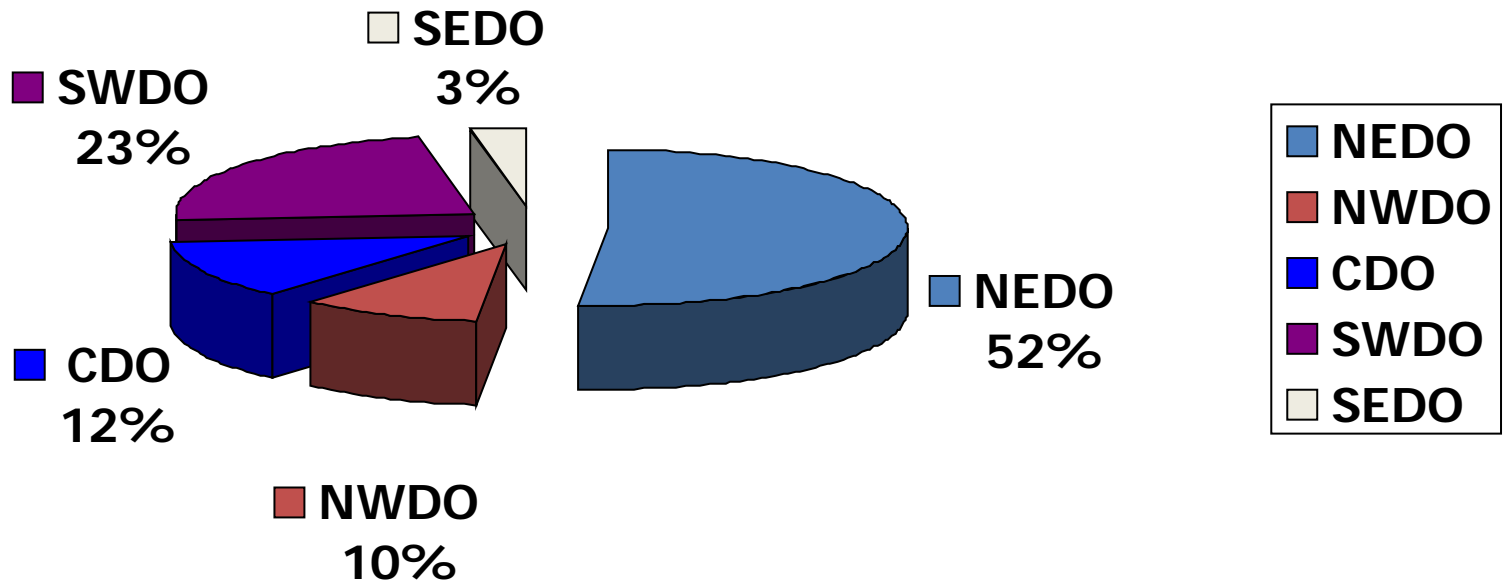
Phase II MS4s

“Small MS4s”

539 Small MS4s covered under
284 general permits



539 Regulated Small MS4s



NPDES Small MS4 Storm Water Update

- New MS4s based off 2010 Census
 - 50 Small MS4s notified on July 15, 2016
 - 3 Appendix 7 Small MS4s notified on December 23, 2016
- Regulated Small MS4s should have submitted updated SWMPs no later than December 22, 2016
- Expect more OEPA field presence for MS4 evaluations
- Federal MS4 General Permit Remand Rule
 - OEPA feels that our current general permit satisfies the federal “Comprehensive General Permit” option; due to, the performance standards providing clear, specific and measurable requirements

MCMs 1 & 2 (Public Education / Outreach / Involvement)

Public Education Performance Standard:

Storm Water Public education and outreach program shall include more than one mechanism and target at least five different storm water themes or message over the permit term. At a minimum, one theme or message shall target the development community. Program must reach 50 percent of your population of permit term

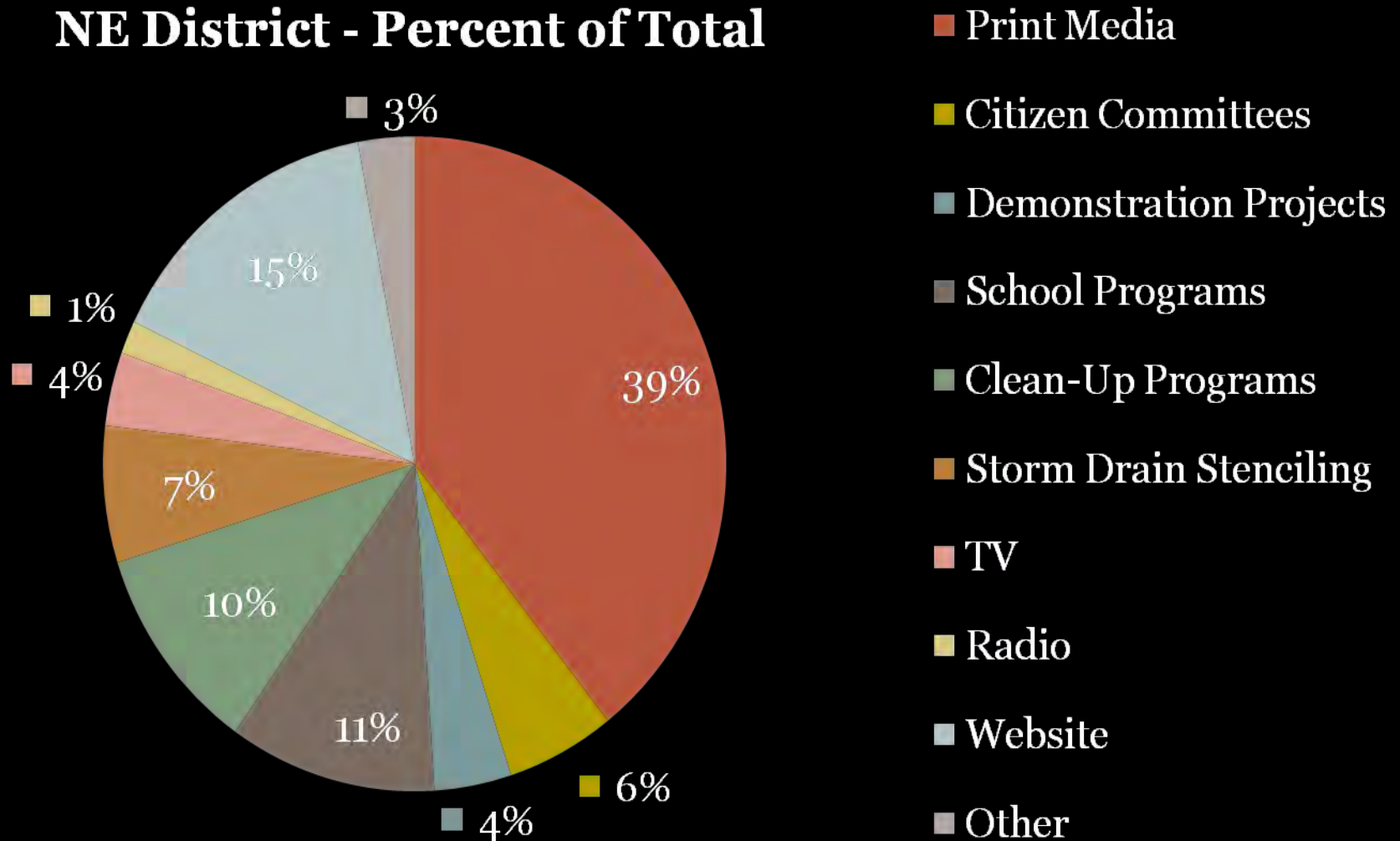
Public Involvement/participation Performance Standard:

Public involvement / participation program shall include, at a minimum, five public involvement activities over the permit term.

MCMs 1 & 2

Outreach/Education/Involvement

NE District - Percent of Total



PIPE Problems (MCMs 1&2)

- Poor theme development
- No strategy specific to themes
- Printed materials dominate
- Effectiveness?

MCM 3 Illicit Discharge Detection and Elimination (IDDE)

Items requiring completion at this point

1. Legal Authority Established
2. Map of all outfalls
3. Comprehensive Map of MS4
4. List and Map of all discharging HSTS to MS4
5. Establishment of Working relationship with Health Department
6. IDDE Elimination Plan

IDDE Problems (MCM 3)

- Dry weather screening follow up
- Maps incomplete
- No plans for failing HSTS
- If HDs not involved, no lists of HSTS
- Failure to develop IDDE Plan

MCM 4 Construction Activities

Required items at this point:

1. Legal authority to review, inspect, and enforce
2. Legal authority must address minimum components of Ohio EPA General Permit
3. Conduct Monthly Inspections.
4. Enforcement Protocols

MCM #4: Construction Site Control

- MS4 does not verify NPDES permit coverage
- Plan reviewers verify that there is a sediment and erosion control plan, but are not verifying compliance with requirements, standards and specifications
- Inspectors lack training, time and tools
 - Inadequate staffing compared to construction activities
 - Inspector does not know how to interpret SWP3 or does not use approved plan to guide inspection
 - No tracking system for inspections and results

MCM #5: Post-Construction

- No inspection of post-construction BMPs to assure proper construction
- No on-going program to assure long-term maintenance
- No inventory/ MAP of BMPs
- Not enough focus on non-structural BMPs or incentives to go “beyond the pond”

MCM 6: Pollution Prevention Good Housekeeping for Municipal Operations

Performance Standards:

- 1. Develop program to reduce pollutant run-off from Municipal Operations.**
- 2. Develop Training for all Employees**
- 3. Develop SWPPP for Municipal Operations**
- 4. Implement and Maintain BMP's at Municipal Operations.**

MCM 6 - P2/Good Housekeeping for Municipal Operations

- Improper management of catch basin cleanings and street sweepings.
- Poor salt storage practices
- Composting considerations
- Poor employee training
- Equipment/Vehicle Washing illicit discharges
- Failure to develop/implement SWPPP

Ohio EPA Evaluations/Enforcement

- 539 Small MS4s covered under 284 general permits
 - 12 remaining initial Small MS4 evaluations to complete
- To date:
 - 15 enforcement actions for failure to submit annual report(s)
 - 12 enforcement actions for failure to implement required ordinance(s)

For additional information

- **Storm Water Program Web Page:**
<http://epa.ohio.gov/dsw/storm/index.aspx>
- **Storm Water Program Archived Webinars and Resources:**
<http://epa.ohio.gov/dsw/storm/index.aspx#108452497-outreach>
- **Ohio EPA eBusiness Center:**
<https://ebiz.epa.ohio.gov/login.html>
- **STREAMS Guidance Documents:**
<http://epa.ohio.gov/dsw/ebs.aspx#170645014-guidance>

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