

UNINCORPORATED FRANKLIN COUNTY AND TOWNSHIPS STORMWATER MANAGEMENT PROGRAM 2009 – 2013

Draft for Comment



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Executive Summary

The Franklin County Stormwater Partnership and program was initiated in 2003 to join programs related to drainage management, water quality management and stormwater regulation compliance. The partnership was formed between the County Engineer, Economic Development and Planning, Sanitary Engineer, Board of Health, Franklin Soil and Water Conservation District and 17 townships. More recently, Public Facilities Management, Fleet Management and Mid Ohio Regional Planning Commission have joined the partnership. The County Commissioners are the Permittee with the County Engineer and townships as Co-Permittees, for compliance with the Small MS4 general permit under the Ohio EPA Stormwater regulation program.

Stormwater regulations are authorized out of the Federal Clean Water Act, mandated by the US Environmental Protection Agency and executed by the Ohio Environmental Protection Agency, Division of Surface Water. The stormwater program is part of a progressive effort to reduce the volume of stormwater and manage pollution captured by stormwater that is conveyed through municipal storm sewers to community streams during storm events. The stormwater program requires urbanized communities to increase community awareness of and involvement in managing stormwater; maintaining accurate records on the location of municipal storm sewers including structures, pipes, and grassed swales; identifying and eliminating illegal discharges into storm sewers and ditches; regulating and inspecting active construction sites and completed developments to ensure compliance with state regulations; and managing stormwater runoff from municipal properties and community roadways.

The program is organized by six minimum control measures as required by the stormwater permit. Under each minimum measure are best management practices as outlined by annual reporting requirements. Planned activities are outlined under each best management practice and have been developed after a review of permit requirements, county and township operations, pollutants of concern and the community environment. These planned activities are intended to meet permit requirements while making the best use of available resources, knowledge and experience of existing agencies, partners and staff.

Highlights of continued and new targets for the stormwater program include:

- multi faceted stormwater communications and education efforts with support from all partners that are tied to current research and innovative approaches;
- continued resolution of illicit discharges including failing Household Sewage Treatment Systems (HSTS) within Franklin County;
- continued mapping of township storm sewers to be added to existing drainage and stream resource maps;
- updated county regulations and procedures for construction site and post construction management through zoning and subdivision regulations;
- participation of all county and township building and fleet managers in pollution prevention programs; and
- all county and township fleet and storage facilities to have completed Storm Water Pollution Prevention Plans (SWPPP).

In summary, the Franklin County and Townships Stormwater Management Program is necessary to comply with state regulations and the Federal Clean Water Act. This effort has strong support from many county agencies and partners. Due to the comprehensive nature of this stormwater permit and the number of partners involved in compliance, leadership and organization will continue to be important to the success of this program. Permit compliance and program needs range from awareness in day to day operations, to development of internal policies and procedures, to funding for program implementation and adoption of regulations. Continued awareness and action from multiple county agencies and the county commissioners will be essential to compliance with the stormwater permit.

Introduction and Background

1. Purpose

The primary purpose of the Stormwater Management Program is to comply with federal and state stormwater regulations. Polluted stormwater runoff is often transported to municipal separate storm sewer systems (MS4s) and ultimately discharged into local rivers and streams without treatment. To address this reality, federal and state regulations require the establishment of an MS4 stormwater management programs to improve the Nation's waterways by reducing the quantity of pollutants that stormwater picks up and carries into storm sewer systems during storm events. Common pollutants include oil and grease from roadways, pesticides from lawns, sediment from construction sites, bacteria from failing septic systems, and carelessly discarded trash. When deposited into nearby waterways through MS4 discharges, these pollutants can impair the waterways, thereby discouraging recreational use of the resource, contaminating drinking water supplies, and interfering with the habitat of fish, other aquatic organisms, and wildlife.

Franklin County and its townships are required to develop, implement, and support a Stormwater Management Program (SWMP) 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 Federal Clean Water Act. The SWMP should include management practices, control techniques, system designs, and engineering methods and shall be modified to include provisions as Ohio Environmental Protection Agency (EPA) determines appropriate after its review of the program for the control of stormwater pollutants.

Requirements for the SWMP are outlined under Municipal Separate Storm Sewer System (MS4) NPDES Permit # OHQ000002. A USEPA factsheet further providing an overview of this program can be found in Appendix A. The MS4 Stormwater Permit outlines six minimum measures that a SWMP must address. These minimum measures are: public education and outreach, public participation / involvement, illicit discharge detection and elimination (IDDE), construction site runoff control, post-construction runoff control, and pollution prevention / good housekeeping for municipal operations. The stormwater program shall include best management practices (BMP) for each minimum measure and a table of organization indicating lines of communication, authority and responsibility. Each minimum measure shall include statements as to legal authority and rationale.

The Stormwater Management Program (SWMP) also overlaps with other congruent county objectives including addressing Household Sewage Treatment System failures, improving and expanding digital natural resource data available to land use managers, and promoting a green initiative through *Go Green Franklin County*. These objectives are considered when developing and managing the Franklin County Stormwater Program. Urban stormwater management looks to address the following causes of water degradation: soil erosion, alteration of stream channels, loss of buffer of trees and shrubs along streams, loss of floodplains, runoff from parking lots and road ways, fertilizer and pesticide use on urban land, failing septic systems, combined sewer overflows, household hazardous waste, and illegal dumping.

2. Stormwater Partnership:

The County Stormwater Partnership was initiated on May 27, 2003 with the appointment of Dean Ringle, the County Drainage Engineer, under Resolution County 503-03. This development was aimed at combining resources to improve communication and ideas regarding improved drainage management, water quality initiatives and stormwater regulation. This was a significant achievement which continues to speak to the cooperative nature among county agencies and townships.

As a result of this partnership, the Franklin County Board of Commissioners and 17 townships have decided to submit a joint permit as allowed by NPDES Permit # OHQ000002. This was a logical choice as 11 townships' zoning and subdivision regulations are managed by the Franklin County Economic Development and Planning Department (EDP). All 17 townships, Franklin County Drainage Engineer (FCDE), Franklin County Engineer (FCE), Franklin County Board of Health (FCBOH), Franklin County EDP, Franklin Soil and Water Conservation District (FSWCD), and Franklin County Sanitary Engineers (FCSE) already have a strong working relationship as developed through the Franklin County Technical Review Committee. These organizations now make up the core of the Franklin County Stormwater Partnership. Franklin County Fleet Management and Public Facilities Management have joined the partnership to better address Pollution Prevention and Good Housekeeping requirements, and Mid Ohio Regional Planning Commission (MORPC) has also joined the partnership as an additional resource and supporter through the Central Ohio Greenways Program.

The joint permit for the small MS4 general permit renewal in 2009 required that each co-permittee complete and submit a separate co-permittee NOI form. There continues to be no additional application fee for co-permittees therefore reducing the overall costs for the permit application process. It was clarified in a letter by Ohio EPA on February 4, 2009 as to how counties are to submit their NOI's when partnering with the County Engineers office. The permit requires operators to apply for permit coverage. Ohio EPA believes that both the County Engineers and County Commissioners can be operators. In these situations they have required the county commissioners to submit the NOI and the County Engineers to submit a MS4 Co-Permittee NOI.

The Franklin County Stormwater Partnership is organized under the Executive Stormwater Committee. This Committee has representatives from each partnership agency and a representative from the townships. The regulated agencies in this partnership are Franklin County and the 17 townships.

Involvement of the agencies and organizations include:

- The FCDE was organized to provide oversight to the Franklin County Stormwater Program with the goal of working with existing partnerships to address stormwater quantity and quality needs through the Franklin County Stormwater Partnership.
- The FCE staff provides engineering support for all drainage and stormwater pollution prevention plan reviews. Additional guidance is provided to supplement township knowledge of good housekeeping and pollution prevention for government operations.
- Franklin Soil and Water provides support to the program as the county's natural resource expert. Staff provides the following services: construction site plan reviews and inspections for compliance with stormwater regulations, public outreach and education, stormwater mapping, and illicit discharge detection and elimination support. Franklin Soil and Water also provides support for

providing information to townships, organizing county stormwater meetings as needed, providing coordination support for Good Housekeeping and annual reporting to Ohio EPA.

- Franklin County EDP is responsible for all regulations relating to county stormwater including coordinating review and approvals from the County Planning Commission, Rural Zoning Commission, and Franklin County Commissioners. EDP administers zoning for 11 of the 17 townships and subdivision regulations for all 17 townships.
- FCBOH provides leadership and legal authority for addressing and resolving failing Household Sewage Treatment System (HSTS) issues in partnership with the Franklin County Sanitary Engineers. Staff also provides support for township communications for NPDES Phase II, including pollution prevention updates.
- The FCSE provides funding, political support, and oversees construction of county sanitary sewer extensions.
- Franklin County Fleet Management manages two facilities that serve county agencies.
- Franklin County Public Facilities management oversees construction of buildings and management of parking lots.
- Mid Ohio Regional Planning Commission (MORPC) provides coordination with existing regional planning committees and forums that they organize and facilitate including Central Ohio Greenways.

The table of organization (Appendix A), required by the MS4 NPDES Stormwater permit, outlines more specifically the individuals, positions and organization responsibilities in relation to the Unincorporated Franklin County Stormwater Management Program.

3. Development of the SWMP

A SWMP was developed in 2003 with NPDES Permit # OHQ000002. This process started with county and township work groups facilitated by FSWCD and FCDE.

The process led to a working group involving all townships, county agencies, and stakeholders. This working group developed recommendations for each minimum measure. A stormwater management program was then developed by the Executive Committee consisting of representatives from each of the partnership agencies and a township representative. This plan served as the template with a few revisions through 2008.

With a better understanding of stormwater program management gained through the first generation permit, Franklin County Stormwater Partnership updated the program plan in 2009. The County Stormwater Partnership decided to use a similar process to revise the stormwater management program plan to comply with the new permit regulations. Again, all partnership agencies came together and divided into work groups related to the six minimum measures with a total of 28 staff participating. The comments for each group were then used, along with expertise from county agencies, to draft a SWMP plan. This plan will be adaptable and available for public comment.

4. Community Description

Ohio water quality standards, watershed plans and reports, and community statistics are the basis for identifying BMP's, target audiences, targeted pollution sources and planned activities for the County's Stormwater Management Program.

Franklin County is one of Ohio's 88 counties and is centrally located in Ohio at the intersection of north/south interstate 71 and east/west interstate 70. Franklin County is home to the most populated city and capital of the state, Columbus. According to 2009 estimates made available by the Mid Ohio Regional Planning Commission, Franklin County is comprised of an estimated 1,164,725 residents. Of this population, 91.6% live in cities and incorporated villages of Franklin County and the remaining 8.4% of the population, or 98,106 people, live in one of the 17 townships.

Franklin County is diverse in its development ranging from the densely populated urban core to the rural sections on the western and southern sections of the county. In 2000, there was a development restriction placed within lands of the Darby Watershed, and at that time, the Darby Accord was formed through participation of watershed communities. The resulting product was the Big Darby Watershed Master Plan developed in 2006 and adopted by all communities in 2008. The plan provides a framework for managing, developing, and protecting the unique natural resources and water quality in the Big Darby Creek state and national scenic river.

Franklin County encompasses 543.9 square miles and contains the following ten primary watersheds and associated creeks and rivers comprising 339 miles of major rivers and creeks: Alum Creek, Big Darby Creek, Big Walnut Creek, Blacklick Creek, Hellbranch Run, Little Darby Creek, Olentangy River, Rocky Fork Creek, Scioto River, and Walnut Creek. Of special note are the Little Darby Creek and the Olentangy River, both of which have sections designated as state scenic rivers. An additional estimated 800 miles of headwater streams and tributaries contribute to the major rivers and creeks. All main stem streams, a majority of the tributaries, and surface drainage are digitally mapped and characterized for Franklin County. The combination of tributaries and main stem streams comprise watersheds which are defined as the area of land draining to those streams.

Managing water quality in our streams and rivers is important to drinking water, recreation and public health. Today, three reservoirs provide 85% of the more than 130 million gallons of water used daily. The remaining 15% is drawn from the wells in southern Franklin County.¹ The Scioto River and Big Walnut Creek serve as sources of drinking water. The Scioto River begins as a small creek about 80 miles north in Hardin County, northwest of Kenton, Ohio. Rolling through woods and farmlands, this river remains a main water source for Columbus. The Griggs and O'Shaughnessy Reservoirs, located on the Scioto River, have a combined storage capacity of 6.2 billion gallons, holding only a small percentage of the water that flows through Columbus, and providing water for downtown, west and northwest Franklin County. Family picnics, fishing, boating, and waterskiing in the recreation area surrounding and including both reservoirs are enjoyed by thousands every summer. Big Walnut Creek forms about 20 miles northeast of Columbus and feeds Hoover Reservoir. This reservoir can hold 20.8 billion gallons of water; it supplies water for the entire northeast portion of Franklin County and provides a beautiful recreation area for boating and fishing. In the late 1960s it became apparent that an additional water supply would be needed.

A study of southern Franklin County found a large underground water supply between the Scioto River and Big Walnut Creek. Construction began on four large Ranney Collector Wells that ranged from 68 to 109 feet deep with laterals totaling more than 6,000 feet reaching into the aquifer. These wells supply an average of 20 million gallons of water daily to residents in southern Franklin County. The southern portion of Franklin County relies on ground water as their drinking water source, and has established a source water protection area to conserve this resource.

¹ *Columbus Public Utilities: Water Sources* <http://utilities.columbus.gov/Conservation/WaterSources.htm> (accessed August 2010)

Recreation on Franklin County streams and rivers includes fishing, kayaking, canoeing, biking, birding and hiking. In 2009, 17,260 hunting licenses and 48,715 fishing licenses were sold² and 26,586 boats were registered³ in Franklin County.

Under the Clean Water Act, every state must adopt water quality standards to protect, maintain and improve the quality of the nation's waters. Water quality standards are related to ambient standards (in-stream water quality) as opposed to end of pipe or discharge standards. Ambient standards are determined by calculating what the streams water pollution assimilative capacity is through procedures known as Total Maximum Daily Loads (TMDLs) or waste load allocations. These loads or allocations regulate the discharge of pollutants into surface waters under the National Pollutant Discharge Elimination System (NPDES) permit program. Water quality standards have three major categories which are Beneficial Use Standards, Numeric Water Quality Criteria, and Antidegradation. An overview of Ohio water quality standards can be found in Appendix B.

In Franklin County, main stem stream segments are in generally good to excellent condition with few exceptions. In contrast to the larger rivers and streams, the water quality of the majority of smaller waterways is degraded.⁴ Watersheds that have stream segments in non-attainment with Ohio water quality standards have been listed by Ohio EPA as impaired waters. The Total Maximum Daily Load (TMDL) program, established under Section 303(d) of the Clean Water Act ([33 U.S.C. 1313](#)), focuses on identifying and restoring polluted rivers, streams, lakes and other surface water bodies. A TMDL is a written, quantitative assessment of water quality problems in a water body and contributing sources of pollution. It specifies the amount a pollutant needs to be reduced to meet water quality standards (WQS), allocates pollutant load reductions, and provides the basis for taking actions needed to restore a waterbody. Watersheds in Franklin County with completed a completed TMDL include Big Walnut, Big Darby and Olentangy River Watersheds.

Ohio's Watershed Coordinator Program supports local led and written watershed action plans. The purpose of these watershed plans is to develop locally identified and supported plans to maintain and improve water quality on a watershed basis. These plans take existing state information and bring this information down to the local level. The action plans are voluntary and the existence of plans can open up opportunities for state funding. Currently in Franklin County the Olentangy, Big Walnut and Alum Creek Watersheds have approved Watershed Action Plans.

A. Priority Pollutants of Concern

For unincorporated Franklin County the causes of impairment to water quality are related to urbanization and stormwater runoff. This includes siltation and channelization from urban development, changes in hydrology due to increased impervious services and stream modifications, pollution from urban runoff, nutrient loading from agriculture, home sewage treatment systems (HSTS) and lawn fertilizer, and bacterial pollution from failing HSTS. Water quality is also impacted by agricultural and urban activities upstream from Franklin County. An overview of information on Franklin County streams and water quality attainment is summarized in Figure 1.

² Ohio Department of Natural Resources Division of Wildlife: License Sales By County 2009; Publication 62 (R510) <http://www.ohiodnr.com/wildlife/dow/regulations/PDF/pub062-2009.pdf>, (accessed August 2010)

³ Ohio Department of Natural Resources Division of Water Craft: Statistics: Ohio Boat Registrations <http://ohiodnr.com/watercraft/statistics/reg05-09/tabid/2784/default.aspx> (accessed August 2010)

⁴ Central Scioto Water Quality Management Plan, Ohio Environmental Protection Agency, 2002

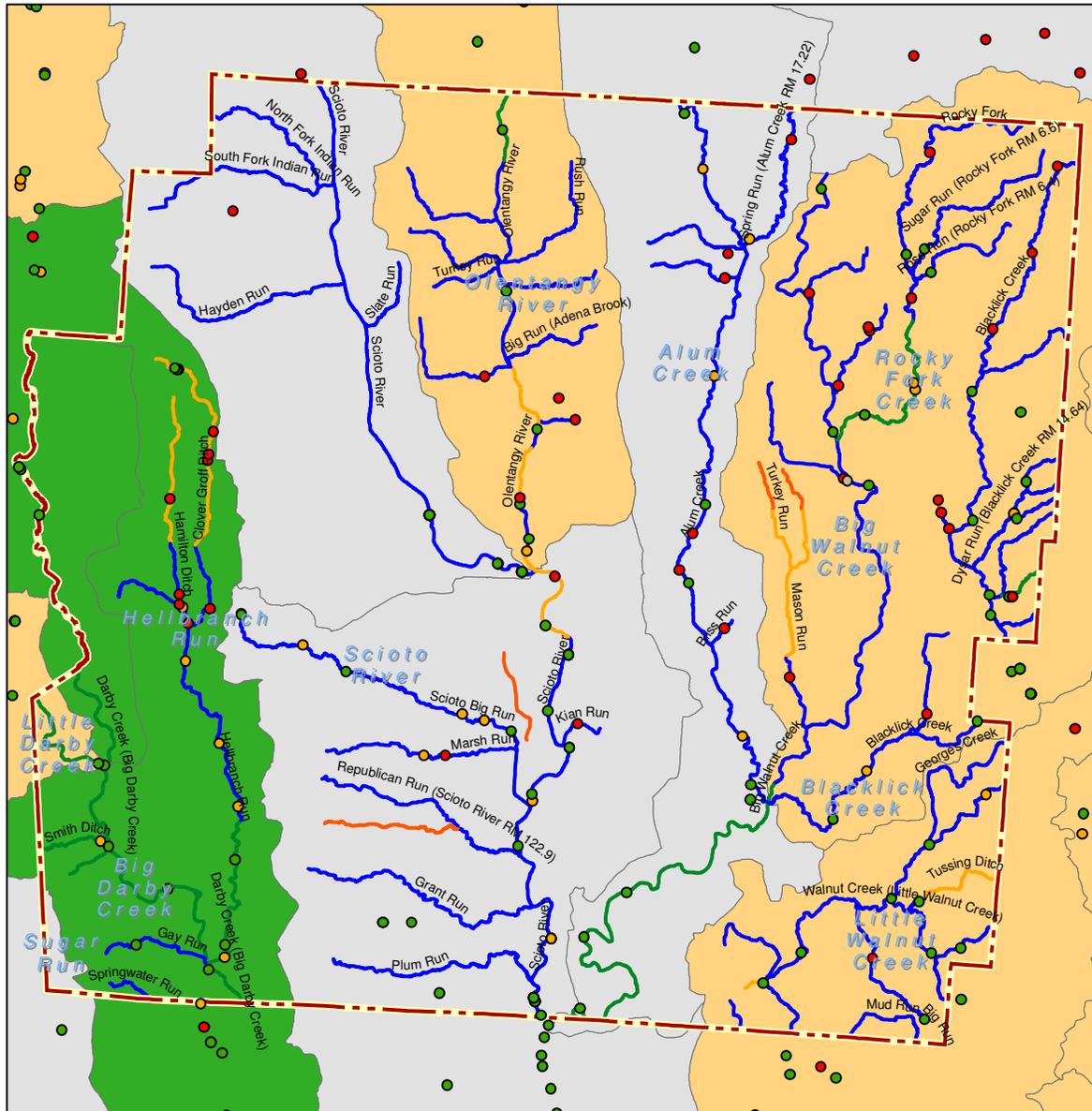
Unique challenges in stormwater management in unincorporated Franklin County include pockets of older communities with failing septic systems due to either the age of the systems and/ or the inability of the soils to manage such systems. The remaining undeveloped portions of the county are less likely to have soils suitable to development while a growing population continues to create a market for new development. Remaining undeveloped land has a high presence of hydric soils (soils that formed under conditions of saturation, flooding, or ponding). These areas are more expensive to build on, pose problems for infiltration of septic systems, and are more likely to contain wetlands.

5. Conclusion

It is the intent of Ohio's MS4 NPDES Stormwater Program that urbanized communities develop a program to address their stormwater management needs. It is with an understanding of unincorporated Franklin County's attributes and challenges that the Stormwater Management Program has been developed and will continue to be implemented. It is recognized by the partnership that a comprehensive stormwater program will benefit the quality of life and sustainability of our communities while meeting state and federal stormwater regulations.

This program benefits from a multi-agency and local government partnership. The county stormwater partnership will allow for consistent stormwater management over a larger area and better utilize limited local resources by reducing duplication of efforts and increasing available resources.

Figure 1: Surface Water Quality Designations and Attainment Status for the Protection of Aquatic Life



Legend

Designations

- Warmwater Habitat
- Exceptional WarmW. H.
- Modified WarmW. H.
- Limited Warmwater H.

Watershed

- Attains
- Impaired
- Insufficient Data

Site Attainment

- Full
- Partial
- Non
- PHWH

Data Source: Ohio EPA Division of Surface Water

Site Attainment Status assessments performed from 2000 through 2008

For additional information visit their website: www.epa.ohio.gov/dsw/

http://www.epa.ohio.gov/portals/35/rules/01-07_eff031510.pdf and

<http://epa.ohio.gov/portals/35/tmdl/2010IntReport/Section%20F.pdf>

The Program

This Stormwater Management Program is organized by Minimum Control Measures. The SWMP Plan includes best management practices (BMPs), measurable goals, rationale, decision process, responsible parties, time schedules, a statement of our opinion about our legal authority to implement the BMP, and other appropriate information. This section is designed to correspond with annual reporting forms provided by Ohio EPA.

1. *Public Education and Outreach*

A. Introduction

The first minimum control measure (MCM) requires Franklin County and its townships to distribute educational materials or provide equivalent outreach activities to the community about the impacts of stormwater discharges including the steps the public can take to reduce pollutants in stormwater runoff. An informed and knowledgeable community is important to a successful stormwater program. This lays the foundation for community participation in responsible land management, compliance with local and state regulations, resolution of failing HSTS impacts and support for community projects and programs needed for a successful stormwater program.

Benefits to Franklin County and the townships include a successful stormwater program, increased pride in the community, and the recognition of Franklin County and the townships as responsible communities and great places to live.

Requirements from Ohio EPA Permit:

- Develop a plan to inform individuals and households about the steps they can take to reduce stormwater pollution including measurable goals, target audiences, target pollutants, and outreach strategy. Five different stormwater themes or messages need to be targeted over the permit term. One of the five messages will be targeted at the development community.
- Develop a rationale for target audiences and pollutants that will make the greatest difference for stormwater quality.
- Identify approaches and mechanisms (e.g., printed brochures, newspapers, media, workshops, etc.) to reach target audiences, and how many people will be reached over the permit term. At least 50 percent of the population needs to be reached over the permit term.
- Evaluate the success of this minimum measure, including how you selected the measurable goals for each of the BMPs.

B. Decision Process

The partnership in Franklin County provides some unique opportunities to provide education and outreach opportunities to unincorporated Franklin County residents. The nature of township governance allows for more direct communication with residents. Sixteen of seventeen townships have a web site where stormwater information could be published and twelve townships publish a newsletter that reaches the majority of their residents. Reaching out to the development community is being achieved by Franklin County EDP. The development community in Franklin County is also reached through an annual Central Ohio Stormwater and Erosion Control Expo, as well as *The Urban Review* newsletter distributed quarterly by FSWCD. Additionally, MORPC and FSWCD staff liaises with the Central Ohio Building Industries Association (BIA) Green Committee to further develop

relationships with the construction /development community. Additional participation and awareness involving the development community will be provided by the six townships that have their own zoning department.

Local elected officials, municipal and township employees, and community activists have several other opportunities throughout the year to meet for surface and stormwater education, outreach, and networking. MORPC facilitates several workgroups for central Ohio, including Central Ohio Greenways, Sustainable Growth Workgroup, and Big Darby Accord Open Space Advisory Committee. MORPC also holds an annual Summit on Sustainability and the Environment which engages community leaders and stakeholders in depth on a variety of topics. FSWCD hosts several web seminars throughout the year offered by the Center for Watershed Protection, USEPA, USEPA Region 5, and USDA on stormwater issues. FSWCD also facilitates the Central Ohio Stormwater Roundtable which meets quarterly for education and networking, *Central Ohio Rain Garden Initiative*, and *Terrific Resources in Environmental Education*. Both MORPC and FSWCD are strong supporters of local watershed groups.

The dispersed nature of the unincorporated areas of the county presents difficulties in effectively and affordably reaching Commercial / Industrial / Institutional audiences. Chambers of Commerce are not an option in some areas since they are in nearby incorporated cities/villages and don't always reach the majority of small businesses in unincorporated areas. It may be possible to work with the township fire departments to have fire inspectors drop off a stormwater pollution prevention fact sheet when inspections are done. Since these are done yearly at every business, coverage would be complete even in unincorporated areas. Township trustees need to approach the local fire departments for approval. This avenue will be investigated but is not in the Measurable Goals and Planned Activities at this time.

C. Best Management Practices

The following BMPs will be used for public education and outreach.

- i. Distribute educational information through articles and illustrative photographs.
- ii. Provide educational presentations and interactive displays to students K-12.
- iii. Organize and advertise community events and demonstrations that engage residents in conservation practices and activities that benefit stormwater quality.
- iv. Provide educational information and discussion through community meetings and events.

D. Themes

Franklin County will address at least five different education themes during the duration of this permit. The themes will target existing and potential community pollution sources as defined under community description on page 10-11.

Possible education themes for consideration are the following.

- i. **Put things where they belong (PTWTB)**, will focus on proper disposal of household, business, and community waste. This will incorporate proper household hazardous waste disposal and recycling opportunities.
- ii. **Only rain down the drain (ORDTD)**, will relay to residents of curb and gutter communities that storm drains convey water to the streams not the treatment plant.
- iii. **Stewardship for small businesses (SFSB)**, will focus on stormwater pollution prevention opportunities for small businesses.
- iv. **Responsible use (RU)**, will focus on responsible application of landscaping chemicals.

- v. **Backyard conservation (BC)**, will focus on the use of composting, rain barrels, rain gardens, native vegetation, and trees to capture stormwater, prevent erosion, and protect stream corridors.
- vi. **Better site design (BSD)**, will focus on how to properly manage construction projects from planning through post-construction maintenance for better water quality, infiltration, and regulation compliance. Targets development community.
- vii. **Green infrastructure (GI)**, will focus on using stormwater infiltration practices and vegetation for better stormwater management, healthier streams, and cleaner water. Targets development community, local governments, and landowners.
- viii. **Managing your HSTS (HSTS)**, will focus on educating home owners on the responsibilities and proper management of an on-site sewage treatment system.

E. Target Audiences

- i. **Residents of townships** are targeted for improvements to general urban runoff pollution.
- ii. **Commercial and industrial businesses** are targeted for improvements in urban runoff pollution and stormwater retention and infiltration.
- iii. **Landowners** are targeted for implementation of conservation implementation that can improve urban runoff and stormwater. Specific landowner audiences that may receive particular attention include:
 - a. Stream side landowners
 - b. Homeowners with HSTS systems
 - c. Landowners considering improvements to their property
 - d. Landowners interested in conservation practices
- iv. **Students and Youth** are targeted because they are the future landowners and decision makers.
- v. **Community groups** are targeted for their ability to reach a larger audience of residents, landowners and businesses and include:
 - a. Watershed groups
 - b. Environmental groups
 - c. Homeowners associations
 - d. Civic associations
 - e. Water Quality Partnership areas
 - f. Scout Troops

F. Responsible Party and Legal Authority

The employee designated by each township will be responsible for the overall management and implementation of the stormwater public education and outreach program. FSWCD will provide assistance with educational materials and presentations. These activities are well within the authority and ability of the townships, in partnership with FSWCD. No additional regulation development will be required.

G. Public Education and Outreach: Measurable Goals and Planned Activities

BMP	Measurable Goal	Theme or Message	Target Audience	Estimated # reached	Summary of Planned Activities	Proposed Schedule & Responsible Party
1) Distribute educational information through articles and illustrative photographs.	a. Each township will publish one theme-specific educational article in a township newsletter and / or website each year. Township stormwater contact may choose theme to fit with township's greatest need as long as five are covered during permit period.	All	Township residents.	50% of households in townships	<p>i. Each township will publish a stormwater education news article to be disseminated to all township residents once per year through newsletter, or web site if no newsletter.</p> <p>ii. Townships will post the article on their township web site if available.</p> <p>iii. In the one township with neither newsletter nor website, other avenues will be considered.</p>	<p>Annually,</p> <p>Township Designated Staff</p> <p>FSWCD Communications Specialist</p>
	b. Most townships with a web presence will have a page or document on their web site on the impacts of stormwater discharges on water bodies and the steps the public can take to reduce pollutants in stormwater runoff.			12 township websites	<p>i. Website development and maintenance is an educational tool used by all partners.</p> <p>ii. FSWCD has stormwater impacts pages. Some townships have stormwater impacts pages already.</p> <p>iii. Stormwater information will be made available on all partner websites. This activity will be documented and retained for annual reporting.</p>	<p>Annually,</p> <p>Township Designated Staff</p> <p>FSWCD Communications Specialist</p>
	c. General interest quarterly conservation newsletter, <i>Frankly Speaking</i> , distributed to over 4,000 interested Franklin County residents, and to special populations including developers, consultants, and contractors.		Franklin County Residents	4,000 residents	<p>i. <i>Frankly Speaking</i> will continue to be distributed to all individuals expressing an interest in receiving conservation updates.</p>	<p>Semi Quarterly,</p> <p>FSWCD Communications Specialist</p>

G. Public Education and Outreach: Measurable Goals and Planned Activities

BMP	Measurable Goal	Theme or Message	Target Audience	Estimated # reached	Summary of Planned Activities	Proposed Schedule & Responsible Party
	d. Developing lands newsletter will be distributed to design, construction, development, and regulatory community three times each year.	BSD GI	Development and local government professionals	400 people	<i>i. The Urban Review</i> will continue to be distributed to all parties engaged in development in unincorporated Franklin County.	Semi Quarterly FSWCD Urban Conservation Specialist
	e. <i>Conservation Tip of the Month</i> , which appears on the Franklin County Homepage, will twice each year focus on a stormwater theme so that over the five year permit period each of the general themes will have been covered at least once.	HSTS PTWTB ORDTD RU BC	Franklin County Employees and Residents	At least 30,000 website visitors	i. Each month a new conservation tip with a link to additional information appears on the Franklin County homepage	Monthly FSWCD Communications Specialist
	f. Electronic media will be used to provide information and updated to interested residents, stakeholders and partners at least six times per year.	HSTS PTWTB ORDTD RU BC	Franklin County residents, elected officials, and conservation professionals	At least 500 people	i. Electronic media will continue to be used to distribute updates and information by FSWCD and MORPC at least monthly. ii. Documentation of occurrences, target audience, and contact numbers will be retained for annual reporting.	Monthly FSWCD Communications Specialist MORPC Outreach Specialist
	g. Ten press releases per year will be distributed to the media on a timely stormwater related topic.	HSTS PTWTB ORDTD RU BC	Franklin County Residents	100% of Columbus Dispatch Circulation Area	i. Press releases will be distributed widely not only to the media but also to stakeholders and employees. ii. Documentation of press releases, including resulting press by the media, target audience, and contact numbers will be retained for annual reporting purposes.	Quarterly FSWCD Communications Specialist

G. Public Education and Outreach: Measurable Goals and Planned Activities

BMP	Measurable Goal	Theme or Message	Target Audience	Estimated # reached	Summary of Planned Activities	Proposed Schedule & Responsible Party
<p>2) Provide environmental educational presentations and interactive displays to students K-12.</p>	<p>a. Provide programming to all schools in unincorporated Franklin County .</p>	<p>PTWTB ORDTD BC</p>	<p>K-12 Students</p>	<p>2,000 students</p>	<p>i. Provide targeted stormwater education programming in coordination with state curriculum standards for students K-12 attending schools in unincorporated Franklin County.</p> <p>ii. With central Ohio partner organizations including Soil and Water Districts in contiguous counties, COSI, and Metro Parks,; FSWCD has facilitated an annual series of workshops for both formal and non-formal teachers.</p> <p>iii. Advertise available resources and programs for stormwater education through education newsletter.</p> <p>iv. Loan out education kits, displays and materials for use by environmental educators.</p> <p>iv.v. Documentation of occurrences, target audience, and contact numbers will be retained for annual reporting.</p>	<p>Annually, FSWCD Education Specialist</p>

G. Public Education and Outreach: Measurable Goals and Planned Activities

BMP	Measurable Goal	Theme or Message	Target Audience	Estimated # reached	Summary of Planned Activities	Proposed Schedule & Responsible Party
3) Organize and advertise events and demonstrations that engage residents in conservation practices and activities that benefit stormwater quality.	a. Each township will annually advertise household hazardous waste collection day through newsletter, website, flier posting, or newspaper of general circulation.	PTWTB	Township residents	10% of residents annually	i. SWACO has a series of HHW mobile collection sites around Franklin County throughout the year. Townships find the nearest drop off and publicize this event to their residents.	Annually Township designated staff
	b. Use existing forums, workshops, and events to provide stormwater information.	HSTS PTWTB ORDTD RU BC	Franklin County residents, businesses, and stakeholders.	Audience dependent on event	i. Participate in the Central Ohio Rain Garden Initiative (CORGI), Terrific Resources in Environmental Education (TREE), Central Ohio Stormwater & Erosion Control Expo, MORPC Summit on Sustainability and the Environment, MORPC Central Ohio Greenways, MORPC Center for Energy and the Environment Advisory Committees, Darby Accord and related committees, Central Ohio Stormwater Roundtable, ii. Progress, target audience, and participation of all events will be documented and retained for annual reporting.	Monthly, FSWCD Communication Specialist MORPC Outreach Specialist
	c. Provide a stormwater related display at township community events.	All	Township residents	2% of residents annually	Stormwater themed display present at township open house, community festival, or other township public event.	Annually, Township designated staff, FSWCD Education Specialist

2. Public Participation and Involvement

A. Introduction

This minimum measure requires Franklin County to engage the public for input and involvement in the county stormwater management program (SWMP) and the county illicit discharge detection and elimination (IDDE) plan. Public participation and involvement follows good public education and outreach to ensure compliance with local and state regulations, resolution of failing HSTS impacts and support for community projects and programs needed for a successful stormwater program. The anticipated results are broader public support, improvements to the program plan and implementation, shorter implementation schedules, additional resources, and greater benefits to water quality in the county.

Benefits to the county include identification of resources and opportunities outside of existing county operations. Participation supports the county's tradition of serving the community.

Requirements from Ohio EPA Permit:

- Describe public involvement opportunities in developing and implementing your stormwater management program.
- Describe target audiences for public involvement including residents, businesses, landowners, educational organizations, and community groups.
- Describe public involvement activities with a minimum of five public involvement activities over the permit term.
- Evaluate the success of this minimum measure, including how you selected the measurable goals for each of the BMPs.

B. Decision Process

To address this minimum control measure, the townships of Franklin County will engage in a stormwater management program that allows for and encourages community participation. In order to involve the community effectively, local elected officials' leadership and support will continue to be important. For example, township trustees who often have close ties with residents, need to understand the need for and support the implementation of the stormwater program. For successful program implementation, local elected official engagement and cooperation will be integral to effective public participation.

After the first draft of the stormwater management program is developed, it will be made available to stakeholders for their comment and review. Stakeholders are identified as residents, businesses, landowners, educational organizations, and community groups, especially watershed groups. Stakeholder input will assist in further development of activities and targets. Once the program has had an opportunity for public comment, comments received will be recorded and addressed. All township trustee meetings comply with Ohio public notice and open records laws.

As required by Stormwater Regulations and as a logical progression of the County SWMP specific focus areas for public involvement will include businesses, developers and communities impacted by HSTS. HSTS education will include focused presentations to affected communities on the IDDE plan under development. This plan will include the identification of geographic areas of pollution discharge that present risks to public health, a prioritization of these locations, a timeframe and methods for eliminating these risks, and opportunities for public input and comment. Individuals

with failing HSTS will be actively involved with FCBH in connecting to sanitary sewer or replacing failing systems.

Participation and involvement opportunities include:

- i. Regular township trustee meetings that are open to and attended by residents.
- ii. Township open house, picnic, harvest homecoming, etc. as available.
- iii. Involvement of youth groups including after-school clubs, scouting organizations, or religious fellowship groups in watershed activities.
- iv. Involvement of adult civic or religious organizations in watershed activities.
- v. Notices in township newsletters and / or websites seeking comment on NOI and SWMP.

C. Best Management Practices

The following BMPs will be used for public education and outreach.

- i. Provide opportunity for and consideration of public input into stormwater management program.
- ii. Involve residents in implementation of stormwater program and improvement of water quality.
- iii. Support existing watershed protection efforts.

D. Themes

Franklin County will address at least five different education themes during the duration of this permit. The themes will target existing and potential community pollution sources as defined under community description on page 10-11.

Possible education themes for consideration are the following.

- i. **Put things where they belong (PTWTB)**, will focus on proper disposal of household, business, and community waste. This will incorporate proper household hazardous waste disposal and recycling opportunities.
- ii. **Only rain down the drain (ORDTD)**, will relay to residents of curb and gutter communities that storm drains convey water to the streams not the treatment plant.
- iii. **Stewardship for small businesses (SFSB)**, will focus on stormwater pollution prevention opportunities for small businesses.
- iv. **Responsible use (RU)**, will focus on responsible application of landscaping chemicals.
- v. **Backyard conservation (BC)**, will focus on the use of composting, rain barrels, rain gardens, native vegetation, and trees to capture stormwater, prevent erosion, and protect stream corridors.
- vi. **Better site design (BSD)**, will focus on how to properly manage construction projects from planning through post-construction maintenance for better water quality, infiltration, and regulation compliance.
- vii. **Green infrastructure (GI)**, will focus on using stormwater infiltration practices and vegetation for better stormwater management, healthier streams, and cleaner water.
- viii. **Managing your HSTS (HSTS)**, will focus on educating home owners on the responsibilities and proper management of an on-site sewage treatment system.

E. Target Audiences

- i. **Residents of townships** are targeted for improvements to general urban runoff pollution.
- ii. **Commercial and industrial businesses** are targeted for improvements in urban runoff pollution and stormwater retention and infiltration.
- iii. **Landowners** are targeted for implementation of conservation implementation that can improve urban runoff and stormwater. Specific landowner audiences that may receive particular attention include:

- a. Stream side landowners
- b. Homeowners with HSTS systems
- c. Landowners considering improvements to their property
- d. Landowners interested in conservation practices
- iv. **Students and Youth** are targeted because they are the future landowners and decision makers.
- v. **Community groups** are targeted for their ability to reach a larger audience of residents, landowners and businesses and include:
 - a. Watershed groups
 - b. Environmental groups
 - c. Homeowners associations
 - d. Civic associations
 - e. Water Quality Partnership areas
 - f. Scout Troops

F. Types of Public Involvement

- i. Active participation by resident representatives, i.e. the township trustees, in stormwater decisions
- ii. Township meeting attendance and comment
- iii. Working with citizen volunteers to educate others in the community
- iv. Clean-up activities

G. Public Participation and Involvement: Measurable Goals and Planned Activities

BMP (mechanism)	Measurable Goal	Theme or Message	Target audience	Estimated # Participating	Summary of Planned Activities	Proposed Schedule & Responsible Party
1) Provide opportunity for and consideration of public input into stormwater management program.	a. Allow for public input into the stormwater management program through township trustee participation.	All	Residents and landowners of township through their elected representatives, the trustees.	At least one trustee from each township covered by the permit.	i. Township representation on County Executive Stormwater Committee planning meetings.	Annually, Township designated representative.
	b. Allow for public comment of stormwater management program.	All	All stakeholder groups including watershed groups, Sierra Club, and Central Ohio Greenways.	Comments received from at least 3 stakeholder groups.	i. Post link to SWMP on websites and in newsletters as applicable. ii. Request review from targeted stakeholder groups.	December 2010, Township designated representative. FSWCD, Communications Specialist FCDE, Drainage Engineer
	c. Put SWMP on trustee meeting agenda once each year.	All	Township trustees and residents	All township trustees and residents attending public meetings.	i. Trustees will put on agenda and invite County Stormwater Exec Committee member to provide update.	Annually, Township designated representative
	d. IDDE plan will include input from community members in impacted communities.		Townships residents in targeted communities.	50% of households in targeted communities.	i. Schedule and advertise public meetings in strategic locations including local media, newsletters and websites. ii. Present overview of IDDE plan and seek comments from residents.	January – December 2010, FCBOH, Environmental Health Director

G. Public Participation and Involvement: Measurable Goals and Planned Activities

BMP (mechanism)	Measurable Goal	Theme or Message	Target audience	Estimated # Participating	Summary of Planned Activities	Proposed Schedule & Responsible Party
<p>2) Involve residents in implementation of stormwater program</p>	<p>a. Conduct community projects for stormwater management.</p>	<p>All</p>	<p>Commercial and industrial businesses Community Groups</p>	<p>Community project in all 17 townships over the permit term.</p>	<p>i. Township will have notice in newsletter and/or web site asking employee groups to consider stream clean-up, storm drain marking, etc. for make-a-difference day or other volunteer day. ii. Township will have at least one community activity over the permit term.</p>	<p>Annually, Township designated representative.</p>
<p>3) Support existing watershed protection efforts.</p>	<p>a. Participate in Central Ohio Watershed Council and encourage participation in common goals.</p>	<p>All</p>	<p>Watershed groups</p>	<p>Attendees at COW council meetings.</p>	<p>i. Work with and support citizen volunteers to educate others in the community regarding stormwater.</p>	<p>Semi Quarterly, FSWCD Communication Specialist and Director MORPC Outreach Specialist</p>

3. Illicit Discharge Detection and Elimination

A. Introduction

This minimum measure requires Franklin County and townships to implement and enforce a program to detect and eliminate illicit discharges, and includes comprehensive mapping of the Municipal Separate Storm Sewer System (MS4). As defined by Environmental Protection Agency (EPA), an MS4 is: the conveyance or system of conveyances (including roads, catch basins, curbs, gutters, ditches, man-made channels, or storm drains) that are owned or operated by a public body, designed and used for collecting storm water, is not a combined sewer, and is not part of a Publically Owned Treatment Works (POTW).

An illicit discharge is any discharge to an MS4 that is not composed entirely of stormwater with some exceptions. These exceptions include waterline flushing, springs, water from crawl space and sump pumps, footer drains, landscape irrigation, lawn watering, diverted stream flows, rising ground waters, individual residential car washing, uncontaminated groundwater, foundation drains, uncontaminated pumped groundwater, air conditioning condensation, dechlorinated swimming pool waters, potable water sources, flow from riparian habitats and wetlands, street wash water, and discharges or flows from fire fighting activities. Addressing this minimum measure includes mapping, legal prohibition and enforcement, and a plan to detect and address discharges.

Benefits to the County include the ability to comprehensively map and view storm sewer, stream, surface drainage, and other related features and problem areas simultaneously, and to make this information available electronically for desktop analysis and data distribution. This process will also provide the means of mapping and documenting the information required to support sewer extensions if and where needed. Identifying and actively address water quality issues at the local level supports the recognition of Franklin County as a “green” community, ensures that this remains a great place to live, and serves as a regional example for improving water quality for other counties and townships.

Requirements from Ohio EPA Permit:

- Develop, implement and enforce a program to detect and eliminate illicit discharges into your small MS4.
- Complete 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. The comprehensive storm sewer system map shall also include your MS4 system, including catch basins, pipes, ditches, flood control facilities (retention/detention ponds), post-construction water quality Best Management Practices (BMPs) and private post construction water quality BMPs. The map must be updated annually and as needed.
- Mapping must contain a list of all Household Sewage Treatment Systems (HSTSs) connected to discharge 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.
- Prohibit, through ordinance, or other regulatory mechanism, illicit discharges into the storm sewer system and implement appropriate enforcement procedures and actions.
- Develop and implement a plan to detect and eliminate non-stormwater discharges, including illegal dumping, to your MS4.
- Identify residences with existing individual discharging HSTSs that can be legally, feasibly and economically connected to sanitary sewers.

- Develop or enhance an operation and maintenance program which determines if existing HSTs are operating as designed and intended and if not, then a program that requires elimination, upgrade or replacement of the systems.
- Investigate the source of contamination in outfalls identified during the dry weather screening process.
- Work with local waste water authorities to evaluate the planned or possible future installation of sewers for areas which contain high densities of discharging HSTs.
- Inform public employees, businesses and the general public of hazards associated with illegal discharges and improper disposal of waste.
- Identify and address non-stormwater discharges (illicit discharges) that are significant contributors to your MS4, such as landscape irrigation, lawn watering, diverted stream flows, etc..
- Priorities and goals shall be revised annually based on data collected and evaluated.

B. Decision Process

Franklin County Phase II NPDES Stormwater Permit partner agencies have made significant strides in mapping our MS4s and illicit discharges in the unincorporated areas of Franklin County. The County Stream Geodatabase includes comprehensive mapping of most streams, tributaries and outfalls creating a very extensive GIS layer for stream management, setback regulation mapping, pollution source tracking and more. This is the base for which remaining HSTs and MS4 mapping are referenced to or based from. While the county exceeds the norm both at the local, state and national level for mapping and information for surface waters, there are some significant challenges to meeting some of the minimum mapping requirements as stated in the state permit.

FCSE and FCBH have been actively involved in identifying areas where water quality is impacted by failing septic systems and are working to finalize agreements with City of Columbus to extend sewer into these water quality partnership areas. This program while separate does overlap with the Illicit Discharge Detection and Elimination (IDDE) requirements. As part of this effort, Franklin County identified priority areas as Water Quality Partnership Tier I areas and started eliminating approximately 1,000 failed HSTs through the installation of sanitary sewers. This effort led to the elimination of many illicit discharges to MS4s. Recently, the Franklin County Commissioners were awarded national stimulus money. This stimulus funding will be used to install new sanitary sewer mains in some of the remaining Water Quality Partnership Tier I Areas which will eliminate an additional 250 to 350 failed HSTs and associated illicit discharges. As such, Franklin County is in a position to update its priority areas and strategically plan for addressing illicit discharge issues throughout the remainder of the county. Data from dry weather screening and sampling stormwater discharges from suspicious outfalls that has and continues to be accumulated will be analyzed to prioritize the extension of sanitary sewers to areas that are now served by failed or failing HSTs. The prioritization process will involve public participation.

With the updated requirements for illicit discharge mapping in the current permit, the strategic plan will also address the task of completing the mapping of MS4s, and the HSTs illicitly connected to these MS4's, for the remainder of the county. A database and associated GIS map will be developed of all of the HSTs in Franklin County as part of the Franklin County Board of Health (FCBH) operation and maintenance program. This effort will require a thorough, cooperative effort between Franklin County Drainage Engineer (FCDE), FCBH, FSWCD and each of the 17 townships.

Currently the county and township outfall and surface drainage mapping stands at approximately 96%. The remainder of surface drainage and outfalls is to be completed within the time period of this permit. Nearly all of the work that needs to be completed for the MS4 mapping is of the sub-surface infrastructure and will require a substantial amount of funding and personnel resources to complete. These resources are not currently available and must be secured before the remainder of the mapping can be completed. While funding is being sought, FCDE will initiate this effort by mapping the subsurface piping of the MS4 owned by FCE. As part of this mapping process FCDE and FSWCD will develop a process and standards that will facilitate the addition of the township MS4 mapping data as funding becomes available to the townships.

C. Summary of Planned Activities

The following describes how Franklin County plans to proceed with the requirements for NPDES permit:

- i. Review IDDE activities completed, data collected during initial permit period and define new priority areas.
- ii. Begin a comprehensive and strategic planning process to evaluate all unsewered, moderately – to – densely populated areas to determine which of them present the greatest risk to the public health due to surface and ground water contamination by potential human pathogens from illicit discharges and evaluate those areas where significant numbers of illicit discharges may cause the receiving waters to violate USEPA / OEPA recreational water pathogen or nuisance standards. This evaluative process will include community input, discussions, and decisions about:
 - a. connecting at risk unincorporated geographical areas or subdivisions with illicit discharges and/or failed HSTS to a sanitary sewer extension;.
 - b. improving sanitary sewer extension funding and maintenance;.
 - c. improving jurisdictional cooperation on annexation issues;.
 - d. providing public notice, education, and participation;.
 - e. repairing, upgrading or replacing illicit discharges and/or failed HSTS in at risk unincorporated geographical areas or subdivisions with without access to sanitary sewers to meet current water quality standards;.
 - f. funding the repair, upgrade or replacement of illicit discharges and/or failed HSTS;.
 - g. requiring continuous inspection, operation, and maintenance programs of all existing HSTS; and
 - h. establishing flexible, reasonable and transparent time frames.
- iii. Continue the dry-weather-screening and sampling throughout each of the townships for the remainder of 2009 and incorporate updated data collection procedures to enable sub-surface mapping in 2010, including mapping of catch basins, outfalls, ditches, etc.
- iv. Initiate strategic planning sessions involving FCSE, FCBH, FSWCD with input from FCE and FCDE, and the township trustees to evaluate the next tier of unsewered areas where the installation of sanitary sewers or upgraded HSTS must occur. This IDDE plan will be presented to impacted communities for input and is expected to be completed by late 2010. The plan will include all of the requirements set forth in the current permit.
- v. Address the issue of mapping sub-surface MS4 components during the strategic planning sessions. This requirement is currently viewed as the most resource laden requirement and there will be various avenues to completion defined in the IDDE plan, all of which will have extended time frames likely forecast to 10-ten plus years to reach adequate levels of funding to achievable status of near-completion. The ultimate goal will be to complete a GIS layer that includes directionality of flow of all MS4s to enable visual and eventually modeled flow patterns throughout Franklin County.

- vi. Evaluate effectiveness of existing activities and identify additional IDDE needs by evaluating water quality sampling data, complaints, and resolution of those complaints.
- vii. Develop recommendations and update plan to improve effectiveness of activities and address additional IDDE needs.

D. Illicit Discharge Detection and Elimination: Measurable Goals and Planned Activities

BMP	Measureable Goal	Summary of Planned Activities	Proposed Schedule and Responsible Party
<p>1) Prohibit illicit discharges through ordinance.</p>	<p>a. FCBH Regulations prohibiting new HSTS illicit discharge into MS4 adopted.</p> <p>b. Zoning regulations prohibiting illicit discharges adopted in County zoning regulations.</p>	<p>i. Facilitate the adoption of HSTS regulations at least as stringent as current Franklin County and state mandated rules for each of the Franklin county townships. (FCBH)</p> <p>ii. Draft zoning regulations to consider for adoption.</p> <p>iii. Zoning regulations prohibiting illicit discharges adopted in county regulations.</p> <p>iv. Educate public and businesses about areas of public health risks based upon ORI data, and prohibitions against illicit discharges.</p>	<p>December 31, 2010, <i>depending on results of 2009 legislative session</i> FCBH, Director of Environmental Health</p> <p>December 31, 2010, Franklin County EDP Planning Staff</p> <p>Ongoing</p>
<p>2) Develop a comprehensive storm sewer map.</p>	<p>a. A comprehensive storm sewer map (MS4) is completed to reasonable extents and formats allowed by available funding.</p>	<p>i. Secure necessary funding to support remaining mapping needs and finalize a course of action based on available funds.</p> <p>ii. Complete a comprehensive storm sewer map of County and township infrastructure using GPS and GIS. If sufficient funding and resources are not available each township will be provided with paper copy base maps showing roads, hydro, political subdivisions, and other layers needed to complete the mapping manually.</p> <p>iii. Complete a comprehensive storm sewer map of County infrastructure by utilizing a combination of GPS and GIS technologies when sufficient funding and resources become available utilizing the products produced in activity.</p>	<p>December 31, 2010, FCDE, County Engineer Township designated representative</p> <p>December 31, 2013, FCDE Engineering Intern FSWCD GIS Natural Resource Specialist Township designated representative</p> <p>December 31, 2020, FCDE Engineering Intern FSWCD GIS Natural Resource Specialist Township designated representative</p>

D. Illicit Discharge Detection and Elimination: Measurable Goals and Planned Activities

BMP	Measureable Goal	Summary of Planned Activities	Proposed Schedule and Responsible Party
<p>3) Complete a list of HSTS discharging to MS4.</p>	<p>a. Complete a excel spreadsheet showing the addresses and Parcel ID's of all HSTS connected to the MS4.</p>	<p>i. Secure necessary funding to support this BMP.</p> <p>ii. Complete the preliminary database that was developed under our initial permit by planning and executing an investigative approach that will cost effectively identify HSTS connected to MS4s consisting of searching electronic sewer billing databases, current electronic files of HSTS on record at the FCBH, paper HSTS records, orthophotographic aerial satellite imagery, and field verification if necessary.</p>	<p>TBD</p> <p>FCBH, Director of Environmental Health</p> <p>FCDE, County Engineer</p> <p>FSWCD GIS Natural Resource Specialist</p>
<p>4) Compile a map of HSTSs discharging to MS4.</p>	<p>a. A GIS map showing all conduits, ditches, and bodies of water and all HSTS connected to these MS4's is completed.</p>	<p>i. Combine 2 GIS layers.</p>	<p>TBD</p> <p>FCBH, Director of Environmental Health</p> <p>FSWCD GIS Natural Resource Specialist</p>
<p>5) Describe procedures for locating priority areas; tracing and removing illicit discharges .</p>	<p>a. Number of illicit discharges removed from MS4's.</p>	<p>i. As part of the IDDE Plan (See Summary of Planned Activities), identify priority areas based upon Dry Weather Screening (DWS), public health risk, and MS4 discharge sample results to remove illicit discharges or failed HSTS from MS4's.</p> <p>ii. Perform outreach to prioritized communities educating HSTS owners about areas of public health risks based upon ORI data, the requirement to remove sources of illicit discharge, or upgrade to Best Available Technology (BAT) Where where sewers will not soon be available (>10-15 yrs)</p>	<p>TBD</p> <p>FCBH, Director of Environmental Health</p> <p>FSWCD GIS Natural Resource Specialist</p> <p>FCBH, Director of Environmental Health</p>

D. Illicit Discharge Detection and Elimination: Measurable Goals and Planned Activities

BMP	Measureable Goal	Summary of Planned Activities	Proposed Schedule and Responsible Party
<p>Continued</p> <p>5) Describe procedures for locating priority areas; tracing and removing illicit discharges .</p>		<p>iii. Mobilize Registered Sanitarians within the Water Quality Section of the Environmental Health Division to dye test and sample discharges from individual illicit or failed HSTS and use current enforcement authority as described in the Ohio Revised Code Chapter 3718; or current Ohio Administrative Code HSTS Rules, or current Franklin County Board of Health HSTS Regulation 720, to eliminate public health nuisances and replace illicit or failed HSTS with a new HSTS.</p> <p>iv. If non-compliance occurs, use Franklin County Prosecutor support and the court system.</p>	<p>TBD</p> <p>FCBH, Director of Environmental Health</p> <p>FSWCD GIS Natural Resource Specialist</p> <p>FCBH, Director of Environmental Health</p>
<p>6) Develop and implement a plan to detect and eliminate <u>non-stormwater discharges.</u></p>	<p>a. A completed and updatable IDDE plan that considers stormwater discharges, and significant non-stormwater discharges.</p> <p>b. Implement IDDE including ongoing education, participation and program evaluation.</p> <p>c. Coordinate IDDE Program with MS4 IDDE efforts.</p>	<p>i. Facilitate the completion of IDDE plan in coordination with County Partners.</p> <p>ii. Evaluate significant non-stormwater, stormwater and MS4 IDDE data , and outside input when developing, evaluating and updating the IDDE Plan.</p> <p>ii. Complete IDDE Plan.</p> <p>iii. Measure (MCM) are given and documented at one Township Trustee meeting in each Township per year or by invitation to other public meetings, businesses, etc.</p> <p>iv. Annually review and evaluate the effectiveness of the IDDE Plan and document results in Annual Reporting.</p>	<p>January 1- December 31, 2010</p> <p>FCSE, FCBH, FSWCD with input from FCE and FCDE</p> <p>December 31, 2010</p> <p>FCBH, Director of Environmental Health ; assistance from FSWCD and FCSE</p> <p>Annually and Ongoing</p> <p>FCBH with support from county partners.</p> <p>Annually during evaluation, reporting and updating starting February 15, 2011 through December 31, 2010</p>

D. Illicit Discharge Detection and Elimination: Measurable Goals and Planned Activities

BMP	Measureable Goal	Summary of Planned Activities	Proposed Schedule and Responsible Party
<p>6) Continued....</p> <p>Develop and implement a plan to detect and eliminate <u>non-stormwater discharges.</u></p>		<p>v. Annually report the number of HSTS converted to Sanitary Sewer and the number of number of HSTS removed from the County’s Stormwater Sewer System.</p> <p>vi. Update IDDE Plan as needs are identified.</p>	<p>Annually during evaluation, reporting and updating starting February 15, 2011 through December 31, 2010</p>
<p>7) Dry weather screening of outfalls.</p>	<p>a. Completion of ‘dry weather screening.’</p> <p>b. Priority areas, long-term surveillance and evaluation, and mapping updates to be documented in IDDE Plan.</p>	<p>i. Long term surveillance plan for dry weather screening in MS4 detailed in IDDE Plan.</p> <p>ii. Results of dry weather screening incorporated into GIS layer.</p> <p>iii. Annual Reporting of dry weather screening results including number of outfalls screened and flows identified and number of illicit discharges identified and eliminated.</p> <p>iv. Complete ‘dry weather screening’ of all outfalls and annual sampling of suspicious outfalls in each townships to the extent current funding allows.</p>	<p>December 31, 2010, FCBH, Director of Environmental Health</p> <p>Ongoing, FSWCD, GIS Natural Resource Specialist</p> <p>December 31, 2013, FSWCD, GIS Natural Resource Specialist</p> <p>FCBH, Director of Environmental Health</p>
<p>8) Evaluate Effectiveness of IDDE Plan</p>	<p>a. Documentation of evaluation in Annual Reporting.</p> <p>b. Re-sampling results from MS4’s.</p> <p>c. Number of HSTS converted to Sanitary Sewer.</p> <p>d. Number of HSTS removed from MS4’s.</p>		<p>Annually during reporting starting February 15, 2011 December 31, 2010 FCBH, Director of Environmental Health; assistance from FSWCD and FCSE</p>

4. Construction Site Stormwater Runoff Control

A. Introduction

This minimum control measure addresses management of stormwater runoff from construction activity that results in the land disturbance of one acre or greater. Stormwater runoff management addresses both how water is retained and released during and after stormwater events and how erosion is minimized through design, management of construction activity, and use of erosion control practices until a site is stabilized with permanent vegetation. Sediment is the number one pollutant of concern in Ohio. During a short period of time, construction sites can contribute more sediment to streams than can be deposited naturally during several decades.

During construction, the design and installation of long term stormwater management controls are also reviewed and inspected along with temporary erosion and sediment controls. These controls may use overlapping or separate Best Management Practices.

Benefits to Franklin County and townships include reduced erosion and sedimentation along waterways and ditches, improved quality of streams for recreation and fishing, and continued availability of a quality drinking water supply.

Requirements from Ohio EPA Permit:

- Develop an ordinance or other regulatory mechanism to require erosion and sediment controls, as well as sanctions to ensure compliance. The regulation will be equivalent with the technical requirements set forth in the Construction General Stormwater Permits.
- Require construction site operators to implement appropriate erosion and sediment control BMPs.
- Require 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.
- Develop procedures for stormwater pollution prevention plan review which incorporate consideration of potential water quality impacts.
- Develop procedures for receipt and consideration of information submitted by the public.
- Develop procedures for site inspection and enforcement of control measures.

B. Decision Process

Franklin County has had an active construction site runoff control program since 1986. This program is coordinated and led under the authority of Franklin County EDP and with assistance from and coordination with FCE, FSWCD, FBH, and townships. A committee called the technical review committee meets on a regular basis to review development plan proposals and construction site management challenges. Franklin County Planning Commission, Rural Zoning Commission and Township Trustees with local zoning are also involved in final approval of development proposals and commenting on regulation changes. Plans are reviewed by technical review committee and planning commission. Frequent site inspections are conducted by Franklin Soil and Water Conservation District Staff.

The Franklin County Stormwater Partnership will continue to develop and implement a plan to establish and enforce stormwater runoff controls on construction projects that disturb one acre or more of land. Reduction of pollutants in stormwater discharges from construction activity disturbing less than one acre shall be included if that construction activity is part of a larger common plan of development or sale that would disturb one acre or more. Franklin County EDP is currently updating

the Subdivision Regulations which are expected to be completed by mid 2010. Current regulations and procedures are believed to meet most of the minimum requirements.

In order to control polluted runoff from construction sites, Franklin County and townships with their own zoning are in the process of adopting regulatory mechanisms in their zoning codes that, in most cases, improve existing zoning requiring erosion and sediment control on construction sites, including sanctions and enforcement mechanisms. Franklin County and townships will also update enforcement mechanisms that better capture commercial construction and better control wastes such as discarded building materials, litter, chemicals and sanitary waste. The County Engineers have agreed to assist in reviewing stormwater calculations for the townships

C. Responsible Party and Legal Authority

Franklin County EDP, County Engineer and Franklin Soil and Water Conservation District will be responsible for the overall management and implementation of the construction site stormwater runoff control program. Requirements will be addressed by documenting the creation and implementation of BMPs. The County Engineer and Franklin County EDP will review the success, and document achievement of the measurable goals of the construction site stormwater runoff control program and BMPs.

D. Construction Site Runoff Control: Measureable Goals and Planned Activities

BMP	Measurable Goal	Summary of Planned Activities	Proposed Schedule & Responsible Party
1) Ordinance or Other Regulatory Mechanism	a. Update regulatory mechanism requiring implementation of proper erosion and sediment controls and stormwater pollution prevention for all development sites disturbing over one acre and in compliance with General Construction Permit.	i. Enforce sediment and erosion control of one acre or more with existing regulations and state regulations.	Ongoing, County EDP, Planning Staff FSWCD, Urban Conservationist FCE, Drainage Engineer
		ii. Continue updates to regulatory mechanism	April 30, 2009, County EDP, Planning Staff
		iii. Adopt and implement updated regulatory mechanisms.	December, 2010, County EDP, Planning Staff Townships with own zoning, designated staff
		iv. Cite local code(s) being used (If available, web link for code(s)) will be reported in the annual report).	Annually, County EDP, Planning Staff and Townships with own zoning, designated staff
2) Sediment and Erosion Control Requirements	a) Enforce regulatory mechanism requiring implementation of proper erosion and sediment controls.	i. Enforce sediment and erosion control of one acre to ensure compliance with existing regulations and state regulations. ii. Annually report inspection results.	Annually, FSWCD, Urban Conservationist

D. Construction Site Runoff Control: Measureable Goals and Planned Activities

BMP	Measurable Goal	Summary of Planned Activities	Proposed Schedule & Responsible Party
3) Complaint Process	a. All complaints documented and forwarded to correct agency to address.	i. Number of complaints received and followed-up on results recorded. ii. Complaint database results will be included in the annual report.	Annually FSWCD, Urban Conservationist, FCDE, Engineering Technician
4) Site Plan Review Procedures	a. Develop and implement procedures for reviewing construction plans for sites over one acre for erosion and sediment control and stormwater pollution prevention, including commercial sites for Franklin County and the 6 townships with their own zoning.	i. Implement existing procedures for construction site plan review. ii Update procedures for construction site plans reviews to reflect changes in state and local regulations. iii. Incorporate procedures for site plan review for all 17 townships into revised subdivision regulations. iv. Number of sites requiring plans and number of plans reviewed will be reported in the annual report.	Ongoing, FCE, Engineering Staff County EDP, Planning Staff Townships with own zoning, designated staff FSWCD Urban Conservationist December 2010, County EDP, Planning Staff December 2010, County EDP, Planning Staff Annually, FSWCD, Urban Conservationist
5) Site Inspection Procedures	a. Continue site inspection schedule in compliance with site inspection procedures adopted by each agency. The frequency of inspections must be no less than monthly and after major storm events.	i. Review procedures with relevant county and township staff. ii. Number of sites, number of inspections, and average frequency of inspections will be reported in the annual report.	Annually FSWCD, Urban Conservationist

D. Construction Site Runoff Control: Measureable Goals and Planned Activities

BMP	Measurable Goal	Summary of Planned Activities	Proposed Schedule & Responsible Party
6) Enforcement Procedures	a. Continue to implement enforcement procedures in regulatory mechanisms for erosion and sediment controls, construction site waste controls and stormwater pollution prevention to ensure all requirements are being met.	i. Continue to enforce non-compliance with existing procedures. ii. Begin review and update of enforcement procedures.. iii. Adopt updated procedures and begin to implement and enforce them. iv. Number of violation letters and number of enforcement actions will be reported in the annual report.	Ongoing, County EDP, Planning Staff Townships with own zoning, Designated Representatives September 2009, County EDP, Planning Staff Townships with own zoning, Designated Representatives December 2010, County EDP, Planning Staff Townships with own zoning, Designated Representatives Annually, Franklin SWCD, Urban Conservationist

5. Post-Construction Stormwater Management in New Development and Redevelopment

A. Introduction

These measures start at development plan review and continue through ongoing management of stormwater management practices that remain on site after construction. Well designed and maintained post construction stormwater management addresses both water quantity and quality for the long term. This includes use of non-structural Best Management Practices (BMPs) including wise placement of green space and stream buffers which can reduce costs of ongoing maintenance. Benefits of managed stormwater runoff includes increased infiltration for ground water recharge, decreased stream erosion through reduction of stormwater volumes, and improved water quality through by capturing pollutions from runoff using well designed BMPs or treatment trains.

Requirements from Ohio EPA Permit:

- Develop, continue to implement and enforce a program to address stormwater 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 our small MS4. We will ensure that controls are in place that will prevent or minimize impacts;.
- Develop and implement strategies which include a combination of structural and/or non-structural BMPs appropriate for our community.
- 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. The ordinance or regulatory mechanism we adopt will, at a minimum, be equivalent with the technical requirements set forth in the Ohio EPA NPDES General Stormwater Permit (s) for Construction Activities applicable for our permit area which have been issued at the time of issuance of this permit. This includes the following Ohio EPA NPDES General Stormwater Permits for Construction Activities: OHC000003, OHCD00001 and OHCO00001. If we need to revise an ordinance or regulatory mechanism we will do so within 2two years of the issuance of this permit.
- The plan will ensure adequate long-term operation and maintenance of BMPs.

B. Decision Process

Franklin County will address stormwater 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, with controls that prevent or minimize water quality impacts. This may include retrofits to existing basins to improve the water quality of existing sites' runoff and decrease the quantity of water going into receiving streams. This may also include an educational component on the specifics of what best management practices will best accomplish these retrofits and what best management practices will accomplish post-construction stormwater management on new development sites.

To promote post-construction nonstructural BMPs, Franklin County EDP, Franklin SWCD and townships will work together to establish policies and ordinances that direct growth away from environmentally sensitive areas and protect valuable natural resources. Some examples of these

policies may include conservation development regulations, riparian setback regulations, wetland setback regulations, and tree ordinances.

To promote post-construction structural BMPs, Franklin County will work towards adopting the Franklin County Stormwater Manual for stormwater best management practices that is currently in draft form. This manual will ensure there is an emphasis placed on green infrastructure and ways to minimize pollutants entering our waterways through stormwater quality management planning and design.

As development moves forward within Franklin County, operation and maintenance plans will be required for all post-construction BMPs and an agreement will need to exist that clearly identifies who the responsible parties are for maintaining the BMPs. When selecting BMPs for this minimum control measure community demographics, land use, potential pollution sources, existing water quality, and stormwater system information will be considered.

C. Responsible Party and Legal Authority

The Franklin County Engineer and Drainage Engineer's office will be responsible for the overall management and implementation of the post-construction stormwater management program. Franklin Soil and Water will provide support with technical guidance and educational opportunities to assist the County in training and meeting this minimum control measure.

Franklin County will need to adopt an ordinance and procedures for addressing post-construction runoff from new development and redevelopment projects to the extent allowable under State or local law and coordinate with the Ohio EPA NPDES General Construction permit. This ordinance or regulatory mechanism will need to address implementation, maintenance, inspection and enforcement. This will include continuing to consider, plan and adopt ordinances regarding riparian setbacks, wetland setbacks, open space requirements and green infrastructure.

**D. Post-Construction Stormwater Management in New Development and Redevelopment:
Measureable Goals and Planned Activities**

BMP	Measurable Goal	Summary of Planned Activities	Proposed Schedule & Responsible Party
1) Ordinance or Other Regulatory Mechanism	a). Develop, adopt and enforce a regulatory mechanism requiring implementation of post-construction runoff controls for all development sites over 1onnr acre, including redevelopment sites.	i. Begin development of draft regulatory mechanism. ii. Adopt and implement regulatory mechanism. iii. Cite local code(s) being used.	September 2009, County EDP, Planning Director December 2010, County EDP, Planning Director Township with zoning, Administrators Annually, County EDP, Planning Director
2) Post-Construction Requirements	a). Establish nonstructural BMPs such as policies and ordinances that direct growth away from environmentally sensitive areas and protect valuable natural resources.	i. Develop and adopt policies or ordinances such as riparian ordinances, tree ordinances, wetland ordinances, and conservation development to be adopted by the county and 6six townships with their own zoning.	Ongoing, EDP Planning Director, FSWCD, Urban Conservationist Townships with zoning, Administrators
	b). Establish structural BMPs by adopting the Franklin County Stormwater Manual, currently in draft form, that focuses on green infrastructure structural BMPs .	i. Conduct final edits to County Stormwater Manual. ii. Adopt County Stormwater Manual. iii. Structural and nonstructural standards being used will be listed in the annual report.	TBD, FCDE and EDP planning staff Annually, FSWCD Urban Conservationist

**D. Post-Construction Stormwater Management in New Development and Redevelopment:
Measureable Goals and Planned Activities**

BMP	Measurable Goal	Summary of Planned Activities	Proposed Schedule & Responsible Party
<p>3) Site Plan Review Procedures</p>	<p>a). Develop and implement procedures for reviewing stormwater pollution prevention plans for sites over 1one acre for post-construction BMPs, both structural and nonstructural, including commercial sites.</p>	<p>i. Incorporate procedure for site plan review for all 17 townships into subdivision regulations.</p> <p>ii. Adopt procedures for Franklin County and 6six townships with own zoning to have stormwater pollution prevention plans reviewed.</p> <p>iii. County Engineers will assist in reviewing stormwater calculations for these plans for the townships in addition to the townships that do not have their own zoning.</p> <p>iv. Number of sites requiring plans and number of plan reviews will be reported in the annual report.</p>	<p>December 2010, County EDP Planning Director</p> <p>December 2010, County, EDP Planning Director Township with zoning, Administrators FSWCD, Urban Conservationist FCDE, Engineering Intern</p> <p>Annually, FSWCD, Urban Conservationist</p>
<p>4) Site Inspection Procedures</p>	<p>a). All post construction structural and non structural BMPs will be inspected during implementation and prior to the developer signing off on the site to ensure the BMP will function as intended to reduce stormwater runoff from new development and redevelopment projects.</p>	<p>i. Develop an inspection schedule for structural and nonstructural BMPs.</p> <p>ii. Have all jurisdictions sign on to the inspection schedule so violations can be addressed in a timely manner.</p> <p>iii. Number of sites, number of inspections, and average frequency of inspections will be reported in the annual report.</p>	<p>December 2010, FCDE, Engineering Intern</p> <p>December 2010, FCDE, Engineering Intern</p> <p>Annually, FCDE, Engineering Intern</p>

**D. Post-Construction Stormwater Management in New Development and Redevelopment:
Measureable Goals and Planned Activities**

BMP	Measurable Goal	Summary of Planned Activities	Proposed Schedule & Responsible Party
<p>5) Enforcement Procedures</p>	<p>a). Adopt and implement enforcement procedures that ensure post construction BMPs are in place as intended and according to the general stormwater permit for construction activities applicable to either the County or the Darby Watershed, whichever area the project is located.</p>	<p>i. Begin development of draft regulatory mechanism with enforcement procedures.</p> <p>ii. Adopt and implement regulatory enforcement mechanism.</p> <p>iii. Number of violation letters and enforcement actions will be reported in the annual report.</p>	<p>September 2009, County EDP, Planning Staff FSWCD, Urban Conservationist</p> <p>December 2010, County EDP, Planning Director Township with Zoning, Administrators</p> <p>Annually, FCDE, Engineering Technician</p>
<p>6) Long-Term O&M Plans/Agreements</p>	<p>a). To ensure the long term management and operation of the approved post-construction BMPs, an O & M plan, with a signed agreement between the developer and jurisdiction, must be approved by the appropriate jurisdiction.</p>	<p>i. O&M Plans to be included in regulations and procedures.</p> <p>ii. O&M Plans to be reviewed and approved.</p> <p>iii. Number of sites requiring plans and number of agreement in place will be reported in the annual report.</p>	<p>December 2010, County EDP, Planning Director</p> <p>Ongoing, County EDP, Planning Staff</p> <p>Township with Zoning Administrators,</p> <p>FSWCD, Urban Conservationist</p> <p>FCDE, Engineering Technician</p> <p>Annually, FSWCD, Urban Conservationist</p>

6. Pollution Prevention and Good Housekeeping

A. Introduction

Pollution Prevention and Good Housekeeping requires MS4 to examine and manage their own actions and facilities to help ensure a reduction of pollution collected on streets, parking lots, open spaces, storage and vehicle maintenance areas and then discharged to local waterways. Actions under this minimum measure include policy and procedures for relevant county and township facilities, education of county and township staff, management of county and township construction projects, and identification of green infrastructure opportunities.

Benefits to the county and townships include improving water quality, reduction in fertilizer and pesticide usage and costs, reduction in salt usage and costs, possible cost savings through timely maintenance of storm sewer systems, and the promotion of a “green community” as a community asset.

Requirements from Ohio EPA Permit:

- i. Required employee training to prevent and reduce stormwater pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances and stormwater system maintenance.
- ii. A list of industrial facilities that MS4 owns and operates must be recorded. Such facilities include vehicle maintenance facilities, bus terminals, composting facilities, impoundment lots, and waste transfer stations.
- iii. For facilities not requiring a separate NPDES Industrial permit, a Stormwater Pollution Prevention Plan (SWP3), shall be developed and implemented using the industrial permit SWP3 as a guide.
- iv. MS4 must adopt maintenance activities, schedules, inspection procedures, and proper waste disposal for controls to reduce pollutants.
- v. New flood management projects must be assessed for impacts on water quality. Existing projects should also be evaluated for opportunities to incorporate additional water quality protection devices and practices.

B. Decision Process

In addressing this minimum measure, Franklin County and Townships have evaluated needs and established procedures at facilities under direct control of the County Engineer, Fleet Management and Township road superintendents. This encompasses a total of twenty one facilities. While it is the intent to develop plans for all facilities, SWPPP plans may be limited to facilities within the urbanized area due to limited resources.

The greatest challenge will be writing industrial Stormwater Pollution Prevention Plans (SWPPP) for all identified facilities. With the support of the County Engineers office we will be developing a template that will guide and assist facility managers in completing this task.

With recent salt prices most, if not all, road superintendents and county road crews have worked hard to reduce salt application due to unavailability and cost of salt over the past winter season. An environmental benefit to this reduction of salt application is realized and thus these practices will be adopted into procedures and reported annually. There is some question as to the logic of tracking salt usage as a measurement of success. The primary consideration needs to be safety and weather is the

largest determinant of salt usage. At a minimum the process and procedures will be evaluated for safety, cost savings and pollution control.

The MS4 permit does require the county and townships to assess new flood management projects for water quality impacts and consider retrofits for existing projects. There are currently no facilities that fit this definition under county or township ownership at this time.

C. Description of Facilities Subject to Good Housekeeping Program

County and Township Facilities that are required to have the equivalent of an Industrial SWPPP			
This is a list of all facilities that relate to the following description: vehicle maintenance facilities, composting facilities, impoundment lots and waste transfer stations excluding fire stations.			
Facility Name & Responsible Twp/ Agency	Address	Facility Manager, Position, & Phone	Facility Description
Norwich Township, Maintenance, Wesley Chapel Cemetery	3225 Dublin Road, Hilliard, 43026	Steve Montgomery, Road Superintendent 876-2236	Cemetery, vehicle, and equipment maintenance. Road salt storage.
Washington Township Community Center	5985 Cara Road, Dublin, 43016	Janelle Thomas Parks, Recreation and Roads Director 652-3922	Community and recreation center with attached garage for equipment storage.
Washington Township Maintenance Barn	4675 Cosgray Road, Hilliard, 43026	Dave Gibson	Parks and road department maintenance building. Vehicle and equipment storage.
Jefferson Township Service Department	6620 Havens Corners Road, Blacklick, 43004	Joe Gerhardt	Vehicle and equipment storage. Materials storage including salt, gravel, and asphalt.
Jefferson Township Materials Storage Yard	668 N. Waggoner Road, Columbus, 43004	Joe Gerhardt	Clean materials storage including dirt, concrete and yard waste.
Fleet Management	1721 Alum Creek Drive, Columbus, 43207	Charlotte Ashcraft 462-3412	Vehicle maintenance facility, fueling facility, and an automatic vehicle wash.
Mound Street Fueling station	1105 West Mound Street, Columbus, 43223	Charlotte Ashcraft 462-3412	Fueling facility.
Madison Township Groveport Facility	4585 Madison Lane, Groveport, 43125	Terry Spangler Road Superintendent 836-4467	Vehicle and equipment maintenance and storage.

Madison Township Canal Winchester Facility	6600 Gender Road, Canal Winchester, 43110	Terry Spangler Road Superintendent 836-4467	Vehicle and equipment maintenance and storage.
Hamilton Township Maintenance Facility	Rear 1460 Obetz Road, Lockbourne, 43137	Neal Doersam Road Superintendent 491-7160	Equipment Storage Building
Hamilton Township Storage Building	6390 Lockbourne Road, Lockbourne, 43137	Neal Doersam Road Superintendent 491-7160	Storage Building
Hamilton Township Storage Facility	317 Lockbourne Road, Lockbourne 43137	Neal Doersam Road Superintendent 491-7160	Storage
Perry Township Road Department	7125 Sawmill Road, Columbus, OH 43235	Bryan Shonkwiler Road Superintendent 889-8781	Vehicle and equipment storage and maintenance, salt barn, 1000 gallon above ground gasoline and diesel storage.
Jackson Township Service Garage	3756 Hoover Road, Grove City, OH 43123	Bob Snyder Road Superintendent Ofc. 871-1119 Cell: 679-3036 Fax: 871-6456	Vehicle and equipment storage and Maintenance. 600 ton salt ban. Other materials storage including gravel and dirt.
Blendon Township Service Department	6360 Hempstead Road, Westerville, OH 43081	John N. Giamarco Road Superintendent 882-2673	Vehicle and equipment storage and maintenance. Salt and gravel Storage.
Plain Township Maintenance Building (at township cemetery)	4585 Reynoldsburg-New Albany Road New Albany, OH 43054	Bob Pharris, Maintenance Superintendent 885-9015	Vehicle and equipment storage and maintenance; materials storage including gravel and sand.
Brown Township	2495 Walker Road, 43026	Ron Williams Township Trustee 437-2356	Vehicle and equipment maintenance and storage.
Franklin County Engineer West Maintenance Facility	4444 Fisher Road, Columbus, OHIO 43291	Mark Waite Safety Coordinator 462-4895	Vehicle and equipment maintenance and storage. Salt storage.
Franklin County Engineer Hendron Road Maintenance	4801 Hendron Road, Grove Port, Ohio 43215	Mark Waite Safety Coordinator 462-4895	Vehicle and equipment maintenance and storage. Salt storage.
Franklin County Engineer Morse Road Maintenance	4569 Morse Road, Gahanna, Ohio 43230	Mark Waite Safety Coordinator 462-4895	Vehicle and equipment maintenance and storage. Salt storage.
Franklin County Engineers Main Office	970 Dublin Rd., Columbus Ohio, 43215	Mark Waite Safety Coordinator 462-4895	Vehicle and equipment maintenance and storage. Salt storage.

Sharon Township Maintenance Facility	5561 Milton Ave. Worthington, Oh. 43085	Thomas Kayati Road Superintendent 885-5933	Vehicle and equipment maintenance and storage. Salt storage.
Clinton Township Road Department	3820 Cleveland Avenue, Columbus Oh., 43224	Jack Wilson Road Superintendent 471-6854	Vehicle and equipment maintenance and storage. Gravel and salt storage.
Prairie Township	6725 Alkire Road, Galloway, Ohio 878-3316	David McAninch Road Superintendent 878-3316	Vehicle and equipment maintenance and storage, Salt barn and materials storage.
Mifflin Township Service Department	218 Agler Rd Gahanna Ohio, 43230	Calvin McKnight Road Superintendent 989-1321	Vehicle and equipment maintenance and storage, materials storage.
Franklin Township Road Department	2193 Frank Rd.	Jim Stevens Road Superintendent 279-9411	Vehicle and equipment maintenance and storage, materials storage.

Pleasant & Truro Township have no facilities, letters were provided for documentation.

D. Other Considerations: Green Infrastructure

The Franklin County Stormwater Partnership has long recognized the responsibility and need to set the example for water quality management and stormwater retention. Township and county agencies have committed to locating opportunities for stormwater retention and demonstration projects. These opportunities include bioswales, rain gardens, wetland restoration and conservation easements. Existing green infrastructure demonstrations include a Bio swale on the County Engineers West Outpost, a rain garden at Washington Township Community Center, and conservation easements.

E. Responsible Party and Legal Authority

Responsible Parties are in the table below. Each township and county agency has the authority to manage and make decisions for their facility.

F. Pollution Prevention and Good Housekeeping: Measureable Goals and Planned Activities

BMP	Measurable Goal	Summary of Planned Activities	Proposed Schedule and Responsible Party
<p>1) Employee Training Program</p>	<p>a). Road Superintendents, fleet managers, and staff who participate in fleet management, road maintenance, or drainage management will be required to attend one training a year.</p>	<p>i. Develop Procedures for Employee Training.</p> <p>iii. Training topics, attendees and current procedures will be recorded in annual report.</p>	<p>December 31, 2010</p> <p>Townships, Road Superintendents</p> <p>Annually,</p> <p>Townships, Road Superintendents Fleet Management, Director</p>
<p>2) Facility Management</p>	<p>a). All facilities conducting identified activities of concern are participating in stormwater program.</p>	<p>i. List of facilities including responsible parties and activities completed by all partners.</p> <p>ii. Operations and Maintenance procedures developed and adopted by all partner facilities.</p>	<p>December 31, 2009,</p> <p>FSWCD, Director</p> <p>December 31, 2010,</p> <p>Townships, Road Superintendents Fleet Management, Director</p>
	<p>b). An industrial SWPPP developed for each eligible facility.</p>	<p>i. County facility SWPPP template developed off of industrial SWPPP guidance.</p> <p>ii. SWPPP completed for each facility.</p>	<p>December 31, 2010,</p> <p>Townships, Road Superintendents Fleet Management, Director County Engineer Safety Coordinator</p> <p>December 31, 2010,</p> <p>Townships, Road Superintendents Fleet Management, Director</p>

F. Pollution Prevention and Good Housekeeping: Measureable Goals and Planned Activities

BMP	Measurable Goal	Summary of Planned Activities	Proposed Schedule and Responsible Party
<p>2) Continued.. Facility Management</p>	<p>c). Facility audits conducted and results reported.</p>	<p>i. Procedures for internal inspections and external audits developed.</p> <p>ii. Internal audits conducted and documented.</p> <p>iii. External review conducted and documented for 4four facilities.</p> <p>iv. Compliance reported by all facilities for annual reporting including number of O&M procedures developed, number of inspections.</p>	<p>December 31, 2010, FCDE, Engineering Intern FSWCD Urban Conservationist</p> <p>Annually, Townships, Road Superintendents Fleet Management, Director PFM, FCDE, Safety Coordinator</p> <p>Annually, Townships, Road Superintendents Fleet Management Director FSWCD, Urban Conservationist FCDE, Engineering Intern</p> <p>Annually, Townships, Road Superintendents Fleet Management, Director PFM FCDE, Safety Coordinator</p>

F. Pollution Prevention and Good Housekeeping: Measureable Goals and Planned Activities

BMP	Measurable Goal	Summary of Planned Activities	Proposed Schedule and Responsible Party
3) MS4 Maintenance	a) A system is in place to ensure the inspection storm sewer system including catch basins, inlets, curbs and gutters over the period of this permit. b) Clean and repair stormwater system as determined through inspection of system.	i. Conduct inspection of catch basins, stormwater inlets, and curbs and gutters following management planning procedures. ii. Document cleaning and repairs to stormwater system. iii. Summarize maintenance activities, and maintenance schedules and activities performed.	Annually, Townships, Road Superintendents Fleet Management, Director PFM FCDE, Safety Coordinator
4) Disposal of Wastes	a) All facilities have procedures in place for proper waste disposal.	i. Develop guidance procedures for all facilities to consider adopting for waste disposal, if they have not done so already. ii. Report procedures developed and amounts of wasted disposed of in the annual report.	December 31, 2010, FCE, Safety Coordinator Annually, Townships, Road Superintendents Fleet Management, Director PFM FCDE, Safety Coordinator
5) Road Salt	a) All facilities have and are following procedures in place for salt reduction management.	i. Develop salt management procedures to provide guidance regarding reduction of salt usage. ii. Adopt salt reduction procedures, if they are not already in place. iii. Report tons of salt used, document procedures in place and summarize measures taken to minimize salt usage	December, 31 2010, Townships, Road Superintendents Fleet Management, Director PFM FCEO, Safety Coordinator Annually, Townships, Road Superintendents Fleet Management, Director FCEO, Safety Coordinator PFM

F. Pollution Prevention and Good Housekeeping: Measureable Goals and Planned Activities

BMP	Measurable Goal	Summary of Planned Activities	Proposed Schedule and Responsible Party
<p>6) Pesticide & Herbicide Usage</p>	<p>a) All facilities have and are following procedures in place for salt reduction management. A system is in place to ensure the inspection of storm sewer system including catch basins, inlets, curbs and gutters over the period of this permit.</p> <p>b. Clean and repair stormwater system as determined through inspection of system.</p>	<p>i. Develop procedures to provide guidance regarding reduction of pesticide and herbicide management for communities to consider.</p> <p>ii. Adopt application procedures for reduced usage, if they are not already in place.</p> <p>iii. Report gallons of chemical used, document procedures in place and summarize measures taken to minimize usage.</p>	<p>December, 2010, Townships, Road Superintendents Fleet Management, Director FCEO, Safety Coordinator PFM</p> <p>Annually, Townships, Road Superintendents Fleet Management, Director FCEO, Safety Coordinator PFM</p>
<p>7) Fertilizer Usage</p>	<p>a). All facilities have and are following procedures in place for salt reduction management.</p>	<p>i. Develop procedures to provide guidance regarding reduction of fertilizer management for communities to consider.</p> <p>ii. Adopt application procedures for reduced usage, if they are not already in place.</p> <p>iii. Report pounds of chemical used, document procedures in place, and summarize measures taken to minimize fertilizer usage.</p>	<p>December 31, 2010 Townships, Road Superintendents Fleet Management, Director FCEO, Safety Coordinator PFM</p> <p>Annually, Townships, Road Superintendents Fleet Management, Director FCEO, Safety Coordinator PFM</p>

F. Pollution Prevention and Good Housekeeping: Measureable Goals and Planned Activities

BMP	Measurable Goal	Summary of Planned Activities	Proposed Schedule and Responsible Party
<p>8) Street Sweeping</p>	<p>a). Street sweeping procedures in place for curb and gutter communities.</p>	<p>i. Develop and implement procedures for street sweeping.</p> <p>ii. Document Procedures in place, amount of Material Collected and Properly Disposed.</p>	<p>December 31, 2010</p> <p>Townships, Road Superintendents in curb and gutter communities.</p> <p>Annually,</p> <p>Townships, Road Superintendents in curb and gutter communities.</p>