



**Environmental  
Protection Agency**

Ted Strickland, Governor  
Lee Fisher, Lt. Governor  
Chris Korleski, Director

May 6, 2010

Ms. Ellen Stanifer  
Environmental Coordinator  
City of Miamisburg  
10 North First Street  
Miamisburg, Ohio 45342

**RE: Stormwater Program Evaluation, City of Miamisburg, NPDES permit #1GQ10008\*BG**

Dear Ms. Stanifer:

On Tuesday, October 20, 2009, I met with you to evaluate the City of Miamisburg's stormwater management program. The city was also represented during this evaluation by Beth Moore, Dan Mote, Jeff McMaken, and Tim Young.

The evaluation consisted of discussions about the 6 "Minimum Control Measures" (MCMs) that provide the framework for municipal stormwater programs. The intent was to evaluate activities over the first permit term, from 2003 to 2008. Note that following the discussion of activities for each MCM, specific annual reporting requirements and performance standards (taken directly from the current permit) have been listed.

Based on our discussions and my review of the city's original stormwater management plan and recent annual reports, I offer the following observations and recommendations:

**MCMs 1 and 2 – Public Involvement, Participation and Education (PIPE)**

The city appears to be making reasonable efforts to educate and inform its residents about stormwater management issues, particularly through various local and regional festivals, and through its *Civic Focus* newsletter. Miamisburg also has an agreement with the Miami Conservancy District (MCD) to develop and implement various activities associated with MCM 1. Numbers of participants have been tallied and reported for some of the smaller events, but estimates regarding numbers of residents within the city who have been made aware of basic stormwater issues have not been provided.

Coming up with accurate figures is very difficult, but for future annual reports the city should provide at least ballpark estimates for numbers of residents of Miamisburg who have been made aware of stormwater management issues through various festivals or other events, no matter the sponsor. The city should also consider (if it hasn't already done so) adding relevant stormwater information to its website, and track, if possible,

Ms. Ellen Stanifer  
May 6, 2010  
Page 2

numbers of visitors to that part of the site. Lastly, the city should determine approximately how many of its residents are customers of Montgomery County's Dept. of Water Services. The department includes basic stormwater information with its mailed bills, and the city can get indirect credit for this outreach and education if its residents receive this information.

**MCM 1 - Performance Standards:** Your storm water public education and outreach program shall include more than one mechanism and target at least five different storm water themes or messages over the permit term. At a minimum, at least one theme or message shall be targeted to the development community. Your storm water public education and outreach program shall reach at least 50 percent of your population over the permit term.

**Annual Reporting** Your annual report shall identify each mechanism used, including each storm water theme, audience targeted and estimate of how many people were reached by each mechanism.

**MCM 2- Performance Standards** Your storm water public involvement and participation program shall include, at a minimum, five public involvement activities over the permit term.

**Annual Reporting** Your annual report shall identify each public involvement/participation activity conducted, including a brief description of activity and include an estimate of how many people participated.

### **MCM 3 – Illicit Discharge Detection and Elimination (IDDE)**

**Mapping** All storm sewer outfalls within Miamisburg have been mapped and catalogued, and an estimated 75% of the entire storm sewer network has been mapped. This includes private conveyances and stormwater management structures such as detention basins. It is assumed that mapping of the entire system will be completed by the end of the current permit term in early 2014.

**IDDE Ordinance** Ordinance #5972, which applies to the city's storm sewer system, appears to be relatively complete and comprehensive. The city should consider revising its stormwater management plan and including a summary of the ordinance. The revision should also include a discussion of the city's plan for detecting and eliminating illicit discharges, and how complaints over alleged illegal discharges are pursued and ultimately addressed.

### **Home Sewage Treatment Systems (HSTS)**

Since all residences within Miamisburg are apparently connected to sanitary sewers, this section of the 3<sup>rd</sup> minimum control measure does not apply.

### **Dry Weather Screening**

Efforts to dry weather screen the city's storm sewer outfalls are ongoing. Information is also being collected about outfall locations and materials of construction. In the city's revised stormwater management plan, a schedule should be included that shows which areas in the city will have its outfalls inspected, and when the inspections will be done.

### **Recommendation**

The city should consider marking all storm sewer inlets within its jurisdiction with "Do Not Dump" placards or stenciling. Such markings won't stop all illicit discharges, but may deter some people who incorrectly assume the storm sewer leads to a treatment plant.

**MCM 3 - Performance Standards** Your storm water illicit discharge detection and elimination program shall include or have included an initial dry-weather screening of all your storm water outfalls over the permit term. Your program shall establish priorities and specific goals for long-term systemwide surveillance of your MS4, as well as for specific investigations of outfalls and their tributary area where previous surveillance demonstrates a high likelihood of illicit discharges. Data collected each year shall be evaluated and priorities and goals shall be revised annually based on this evaluation. Your comprehensive storm sewer system map shall be updated annually as needed.

**Annual Reporting** Your annual report shall document the following: (1) number of outfalls dry-weather screened, (2) number of dry-weather flows identified, (3) number of illicit discharges identified, (4) number of illicit discharges eliminated, (5) provide schedules for elimination of illicit connections that have been identified but have yet to be eliminated and (6) summary of any storm sewer system mapping updates.

### **MCMs 4 & 5 – Construction, Post-Construction Site Stormwater Runoff Control**

It was acknowledged during our meeting that the city had not yet taken the time to modify its development review process to incorporate some of the requirements imposed by current stormwater management regulations. Because Miamisburg's initial stormwater management plan is lacking in detail, the city should consider re-writing it to clarify how future proposed development projects will be reviewed in terms of erosion and sediment control requirements, as well as post-construction stormwater management requirements. Reference should be made to specific departments within the city that are involved in reviewing all aspects of proposed developments.

The ordinance itself appears to be fairly thorough, and does a good job of ensuring that access will be granted to post-construction stormwater management features (even on private property) for maintenance purposes. But it's not clear what sorts of post-construction practices would be allowed in the city. The ordinance seems to dwell on water volume and flood control concerns, but makes no mention of treatment of runoff prior to its leaving a particular site, which is the primary goal of NPDES post-construction requirements. Also, the ordinance refers to the previous generation of OEPA's general construction permit (OHC000002). This permit is modified and renewed on a 5 year cycle, and the current version is numbered OHC000003. The ordinance should be modified to state that where applicable, it follows the current version of OEPA's construction permit.

**Recommendations** In addition to better explaining its process for reviewing new development projects, the city's revised stormwater management plan should focus on meeting the performance standards outlined below.

**MCM 4 - Performance Standards** Your construction site storm water control program shall include preconstruction storm water pollution prevention plan review of all projects from construction activities that result in a land disturbance of greater than or equal to one acre. To ensure compliance, these applicable sites shall be initially inspected. The frequency of follow-up inspections shall be on a monthly basis unless you document your procedures for prioritizing inspections such as location to a waterway, amount of disturbed area, compliance of site, etc. If you initially had coverage under a previous version of this permit you shall revise your program to satisfy these performance standards, if needed, within two years of when your coverage under this general permit was granted.

**Annual Reporting.** Your annual report shall document the following: (1)number of applicable sites in your jurisdiction, (2)number of pre-construction storm water pollution prevention plan reviews performed, (3)number and frequency of site inspections, (4)number of violation letters issued, (5)number of enforcement actions taken and (6)number of complaints received and number followed up on.

**MCM 5 - Performance Standards**  
Your post-construction SWMP shall include pre-construction storm water pollution prevention plan review of all projects from construction activities that result in a land disturbance of greater than or equal to one acre to ensure that required controls are designed per requirements. These applicable sites shall be inspected to ensure that controls are installed per requirements. Your program shall also ensure that long-term operation and maintenance (O&M) plans are developed and agreements in place for all applicable sites. If you initially had coverage under a previous version of this permit you

shall revise your program to satisfy these performance standards, if needed, within two years of when your coverage under this general permit was granted.

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

**MCM 6 – Pollution Prevention/Good Housekeeping for Municipal Operations**

Little time was spent discussing the specifics of this control measure. Information contained in recent annual reports suggests the city is mindful of the need to manage materials it uses in ways that reduce the potential for polluting stormwater runoff. What's lacking in both the plan itself and subsequent annual reports is information detailing the types of training city employees have taken per this requirement.

**Recommendations**

A copy of agendas for future training sessions, plus copies of exams that may be given to employees, should be provided to Montgomery County for inclusion in future annual reports. (This would be for training sessions that include discussions about stormwater management.)

**MCM 6 - Performance Standards** Your pollution prevention/good housekeeping program shall include, at a minimum, an annual employee training. Your operation and maintenance program shall include appropriate procedures, controls, maintenance schedules and recordkeeping to address Part III.B.6.d.iii of the small MS4 permit.

**Annual Reporting** Your annual reports shall document the following: (1) summary of employee training program(s) implemented with number of employees that attended and (2) summary of activities and procedures implemented for your operation and maintenance program.

**Conclusions**

The city appears to be doing a reasonably good job implementing portions of its stormwater management program. Over the current permit term it should work toward rewriting its plan to more clearly describe the city's stormwater program, and work on completing tasks that should have been completed within the first permit term.

Ms. Ellen Stanifer  
May 6, 2010  
Page 6

If there are questions about anything discussed in this letter, I can be reached at 937.285.6442 or via email at [chris.cotton@epa.state.oh.us](mailto:chris.cotton@epa.state.oh.us).

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Cotton". The signature is fluid and cursive, with the first name "Chris" written in a larger, more prominent script than the last name "Cotton".

Chris Cotton  
Division of Surface Water

cc: Anthony Robinson, OEPA/DSW/CO  
OEPA/DSW/SWDO Files

CC\bp