



State of Ohio Environmental Protection Agency

Southwest District Office

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

September 25, 2009

Ms. Theresa McGeady
Miami Conservancy District
38 E. Monument Ave
Dayton, OH 45409

RE: Stormwater Program Evaluation

Dear Ms. McGeady:

On Monday, August 10, 2009, I conducted a "screening evaluation" of the Miami Conservancy District's (MCD) stormwater management program. You represented the MCD during this review. A screening evaluation is not as involved as a true audit, which may be conducted in the future to more fully assess MCD's stormwater program against applicable requirements spelled out in its Small "Municipal Storm Sewer System" (MS4) discharge permit.

Based on a review of MCD's original storm water management plan, the most recent annual report, and our discussions, I offer the following observations:

MCMs 1 and 2 Public Outreach, Education, Involvement, Participation

MCD makes considerable effort engaging and educating both the general public and certain professional groups about water quality issues. Because of its status as an MS4, MCD has expanded its already extensive outreach to include stormwater management issues, and will continue to collaborate when possible with other MS4s (most of which are within MCD's jurisdiction) in addressing requirements of MCMs 1 and 2.

The difficulty in being able to measure the impact of all this outreach remains an ongoing issue. It's encouraging to know that "Stream Team" efforts are drawing increasing numbers of new participants who appear to be from diverse backgrounds. Perhaps in the future MCD may be able to orchestrate surveying to the extent necessary to allow for judgments to be made regarding the impact of its outreach and education efforts.

MCD has also been instrumental in helping smaller MS4 communities learn more about low impact development ideas, by organizing seminars and other training sessions. It is hoped these sorts of training opportunities will continue to be held in the future.

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MCM 3 - Illicit Discharge Detection and Elimination

MCD is not legally authorized to develop and implement ordinances "or other regulatory mechanisms" as required by this MCM. Because spills that discharge to waterways within its jurisdiction almost always originate on non-MCD property, the only practical recourse is to contact local responders, if such exist, or to phone Ohio EPA's 24 hour spill response hotline. Monitoring isolated areas which seem to be more vulnerable to illicit dumping is about the most that can be expected.

MCMs 4 & 5 - Construction, Post Construction

As with MCM 3, the Miami Conservancy District is not authorized to create and implement its own ordinances or regulatory mechanisms to address the requirements imposed by these 2 MCMs. MCD abides by requirements for specific construction projects if said projects disturb more than one acre of land, and involve the actual construction of something. Most projects disturb less than an acre, or are considered maintenance, and are thus not bound by OEPA's construction stormwater regulations.

MCM 6 - Pollution Prevention/Good Housekeeping for Municipal Operations

Training records kept for employees and inspection forms used to self-audit MCD facilities suggest the District is doing an adequate job in its attempts to reduce impact to stormwater runoff from its various operations.

Conclusions

MCD is doing an excellent job addressing those MCMs over which it has control. The significance of its efforts in the areas of outreach and education, and in assisting smaller MS4s in addressing Phase II stormwater management requirements, cannot be overstated. It is hoped the District will be able to sustain these efforts in the future.

If you have questions or concerns about anything in this letter, please contact me at 937.285.6442.

Sincerely,



Chris Cotton
Division of Surface Water

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

CC/ca