



State of Ohio Environmental Protection Agency

Southwest District

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November 28, 2007

Terry Dalrymple, P.E.
Chief Engineer, Montgomery County Sanitary Engineering Department
1850 Spaulding Road
Kettering, OH 45432

RE: Storm Water Program Evaluation Screening

Dear Mr. Dalrymple:

On Wednesday, March 14, 2007, I conducted a "screening level" evaluation of Montgomery County's storm water management plan. A screening evaluation is not as involved as a true audit, which would more fully assess the storm water program against requirements spelled out in the county's NPDES permit. Charlie Schaffer and you represented the County's Sanitary Engineering Department; Bert Kelsey represented the Montgomery County Engineer's Office. Based on our discussions, and my review of the county's plan and most recent annual reports, I offer the following observations and recommendations:

Minimum Control Measures 1 & 2 – Public Education, Outreach, and Involvement

While all the activities listed under MCMs 1 and 2 have merit, it's not clear how some of them benefit, or even involve, the public. Workshops listed are geared toward professionals, as was the Best Management Practices tour organized by the Miami Conservancy District. If MCSE employees attended these workshops or otherwise participated in the activities listed, mention should be made in future reports. But how does their presence result in a better informed public regarding storm water issues?

Activities listed under public involvement are likewise useful, but do not appear (based on information provided in the annual reports), to discuss storm water management issues. Such activities should continue in the future, but should only be included in annual reports if there is a storm water management component. Surveys of residential customers should also continue in the future, if funding permits. But unless questions about storm water management issues are asked, results need not be included in storm water management plan annual reports.

Recommendations

Future annual reports should explain in some detail how the activities listed under MCMs 1 and 2 relate to public education, outreach and involvement. Collaboration with the Miami Conservancy District is fully supported and should continue, but the county needs to elaborate on how activities undertaken by MCD (on behalf of the county) actually promote

education and awareness of storm water issues and problems. Opinion surveys should seek information about customer knowledge of storm water issues, as this information could help shape future outreach efforts. MCSE should also consider including storm water related information with monthly bills or annual report information already sent to its customers.

MCM 3 – Illicit Discharge Detection and Elimination (IDDE)

Because of a patchwork quilt of city, township and county jurisdictional areas, it's all but impossible to accurately assess the effectiveness of MCSE's IDDE program. It appears MCSE is reporting and addressing illicit discharges as required by an administrative order issued by Ohio EPA. Efforts are ongoing to identify and ultimately replace failing residential septic systems.

Recommendations

1. Continue mapping outfalls, coordinating this work with other municipal jurisdictions when possible to streamline the effort. Future permit requirements may extend to developing maps of storm sewer systems, in addition to identifying outfalls.
2. Undertake a storm sewer inlet marking program, and provide information in next year's annual report estimating numbers of inlets to mark, how many could be marked each year, and how long it could take to do all areas within MCSE's jurisdictional area. This activity could be coordinated with local municipal entities to lower costs. A preliminary schedule for marking storm sewer inlets should be submitted with the county's annual report for 2007, if possible, or no later than June 1, 2008.
3. To better define which agency/department is responsible for particular aspects of the IDDE program, consider re-writing that part of the storm water management plan in a format that is more easily readable.
4. Does the administrative order issued by OEPA regarding illicit discharge detection already cover the requirements imposed by MCM#3 of phase II storm water regulations? Details should be provided in future annual reports, assuming the administrative order remains in effect. If the county decides to rewrite its storm water management plan, a generalized explanation of the administrative order could be provided in the updated plan.

MCM 4 – Construction Site Storm Water Runoff Control

According to the 2006 Annual Report, Montgomery County passed a resolution requiring new development projects to comply with Ohio EPA's construction storm water discharge permit. The resolution became effective in January 2006. Based on information included in the Annual Report, it's not clear what each respective county agencies' role is with respect to ensuring that erosion and sediment control requirements included in the new ordinance are reviewed prior to construction, and adhered to while construction is active.

Recommendations

1. The revised storm water management plan should include an explanation of the roles each county agency has regarding reviewing and/or approving new construction projects in unincorporated areas within Montgomery County. Explain in detail the extent to which proposed erosion and sediment control strategies are reviewed prior to approval of projects, and which county department is responsible for inspecting said controls once they've been installed. How requirements are enforced should also be included.
2. Future storm water management plans need only contain information relevant to storm water issues. Article 11 of the county's current subdivision regulations appears to be the only section of relevance with respect to storm water management, and is all that needs to be included with revised plans.

MCM 5 – Post Construction Storm Water Management in New Development

Based on information included in the most recent annual report, Montgomery County's approach to post-construction does not include practices that are designed to improve the quality of storm water run off. Reference is made to the use of detention and retention basins, but this seems to be in the context of volume control, not water quality improvement. The annual report also states that townships are being encouraged to develop zoning standards that result in vegetation being planted in key areas on newly developed sites.

Recommendations

Revised storm water management plans must specify how future construction projects within MCSE's jurisdiction will meet post construction runoff management requirements. Additional information also should be included which explains more specifically how the county encourages townships to modify zoning standards to accommodate post construction storm water management practices.

MCM 6 - Good Housekeeping/Pollution Prevention

We didn't spend much time discussing details of this permit requirement, but based on information in the annual report, it appears county departments are doing different things with respect to pollution prevention/materials use reduction/good housekeeping practices. This could complicate efforts to show how the county is meeting this requirement of its storm water permit.

Recommendations

To be in compliance, MCSE must demonstrate it has an operations and maintenance program in place (including a training component), the goal of which is to prevent or reduce the contamination of storm water runoff from municipal operations. Key activities of concern include maintenance of parks or other outdoor facilities, maintenance of buildings and vehicle fleets, among other things. Some information is provided regarding activities at

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the Public Works Department's Solid Waste Services Division, but future storm water management plans must include more specific information from each county entity that conducts pollution prevention/waste reduction activities. As a way of showing progress, departments should be asked to document general changes in practices over the years which have reduced or eliminated the amounts of waste created, or resulted in reduced use of particular materials, such as salt application for snow and ice control in winter. It is assumed that fiscal constraints in recent years have lead to changes in materials usage simply from an economic standpoint. These changes should be discussed, or at least summarized, in future plans, and updated year by year in annual reports.

Overall, it appears from my cursory review that MCSE is doing a reasonable job with implementation of its storm water management program. Note that future audits of the program are likely to be far more in depth.

If you have questions or concerns about my findings and recommendations, please contact me at 937.285.6442 or via email at chris.cotton@epa.state.oh.us.

Sincerely,



Chris Cotton
Division of Surface Water

cc OEPA/SWDO/DSW Files
Jason Fyffe, CO/DSW

CC/mab