



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

November 20, 2012

Mr. Richard Robertson
Environmental Health and Safety Specialist
Department of Environmental Health and Safety
Wright State University
3640 Colonel Glenn Highway
Dayton, OH 45435-0001

RE: Storm Water Program Evaluation

Dear Mr. Robertson:

On Wednesday, October 17, 2012, I conducted a cursory “screening evaluation” of Wright State University’s (WSU) storm water management program. You represented the university during this review. The evaluation consisted of discussions about the 6 “Minimum Control Measures” (MCMs) that provide the framework for municipal storm water programs. The intent was to evaluate program activities over the first permit term, from 2003 to 2008.

The evaluation was also intended to discuss ways to improve WSU’s storm water management plan (SWMP), which was first submitted in 2003 and is now in need of updating. The balance of this letter discusses ways in which WSU can revise its SWMP so that it is easy to read, intelligible, and accurate with respect to activities the university conducts as required by its storm water permit.

MCMs 1 and 2 – Public Information, Participation, Education and Outreach

1. WSU used the template created by the Miami Conservancy District (MCD) as the basis of its first SWMP. This was a good starting point, but it’s now clear that some of the education and outreach activities listed in the initial plan are not being done, while other relevant activities not contemplated in 2003 are taking place. Recent annual reports suggest WSU still participates in MCD’s education and outreach program, but the extent of this participation is not clear. The revised SWMP should discuss WSU’s relationship with MCD in the context of current storm water management regulations. Details concerning specific activities and the numbers of people involved can be provided in subsequent annual reports.
2. WSU’s revised plan should state that its primary audiences for storm water education and outreach materials are students and staff of the university. If it can be determined that specific courses within WSU’s environmental sciences program devote time to

storm water management issues, then this should be discussed in the revised plan.

3. The revised SWMP should include the sources of information that are made available to students on bulletin boards located around campus. Annual reports must contain the titles of particular fact sheets or articles that are posted. General information can probably remain posted for quite some time, but if specific topics are discussed on a rotating basis, then the approach should be explained in the revised plan.
4. It's assumed WSU makes storm water information available over its website, but if this is true there's no mention of it in either the original SWMP, or recent annual reports. The revised plan should discuss the university's use of the internet as another outlet for storm water information if it's reasonable to think this will occur. Directions for accessing the relevant section of the website should be provided, and the site should also contain links to Ohio EPA's and/or U.S. EPA's websites where storm water management information can be found.
5. Some of the information under MCM 1 that discusses staff training should probably be moved to MCM 6, especially if the training is specifically about storm water management issues.
6. The revised plan should elaborate on WSU's involvement with the Groundwater Guardian program, and how this program fits with requirements that intend to educate people about storm water management issues.

MCM 3 Illicit Discharge Detection and Elimination (IDDE)

1. WSU can't create ordinances the way most other MS4s can. But according to verbiage in its original SWMP, WSU could, if necessary, rely on state or local regulations to address illegal discharges to its storm sewer network. The revised SWMP should explain this approach and reference specific state or local regulations that would be invoked if the need arises.
2. From our discussion, it seems pretty clear that WSU works with its own staff as well as outside contractors to ensure that waste or other materials are not placed in drains that could lead to the storm sewer network. The somewhat unusual situation of interior drains (in certain buildings) connecting to outside storm sewers makes the university potentially more vulnerable to problems. But it has also fostered a more vigorous approach to educating relevant staff and contractors about the need to ensure that nothing inappropriate is placed in these drains. The manner and extent to which this education occurs should be explained in more detail in the revised plan.
3. Storm sewer outfalls are checked each year as part of the dry weather screening requirement. The revised plan should remove references to the MCD's involvement in conducting these field inspections, and include a discussion of the general course of action that would be taken to identify a flow observed during dry weather conditions.

4. Mapping of the university's storm sewer network has been completed, with all outfalls identified. This should be mentioned in the revised SWMP. The department(s) responsible for updating or otherwise maintaining the map should also be included.

MCM 4 - Construction Site Storm Water Runoff Controls

1. As with MCM 3, WSU cannot develop an ordinance to address sediment and erosion control issues on construction projects within its jurisdictional area. But it can provide in its revised SWMP a description of how regulated construction projects are overseen from initial proposal to final completion. WSU can rely on specific contract language that holds contractors responsible for complying with erosion, sediment control and materials management regulations, and this needs to be discussed in the revised plan. The university department(s) responsible for administering new construction projects and related environmental regulations should be mentioned in the revised plan as well.
2. The revised plan should also include copies of relevant checklists or other forms that are used to document inspections of construction sites to ensure erosion and sediment controls are being properly installed and maintained.

MCM 5 – Post Construction Storm Water Runoff Controls from New Development

1. The revised plan must explain how WSU ensures that new developments within its territory are installing required post-construction storm water management practices that intend to treat a certain portion of runoff before it leaves the site in question.
2. The issue of operations and maintenance (O&M) agreements is fairly straightforward in that the university will likely own new buildings constructed on its campus. As such, it is better suited to perform needed maintenance on structural post-construction features that may be installed. If in the future newly constructed buildings or facilities on campus were to be owned by an entity other than WSU, then the SWMP will have to be amended to explain how O&M agreements will be developed and put in place.

MCM 6 Pollution Prevention/Good Housekeeping

1. The revised SWMP must explain the types of training that is provided to relevant WSU staff that improves their understanding of the relationship between materials usage (outdoors) and impacts to storm water runoff. Staff in the Grounds Maintenance Department who apply fertilizers, pesticides, herbicides, and deicing salt would be the ones to which this training is most applicable. If WSU contracts out for some of this work, then this should be explained in the revised plan. Details on amounts of various materials used from one year to the next can continue to be included in annual reports.
2. Use of salt for snow and ice control during the winter should also be discussed in the revised SWMP, along with salt storage practices. From recent annual reports, it is

known that brine is being considered for use on campus roads. If this is actually happening, the revised plan should discuss the benefits of doing so.

3. The revised plan must also speak to the university's approach to street sweeping, mainly in terms of how collected material is managed prior to disposal. Because street sweepings are legally defined as solid waste, they are expected to be managed as such prior to off-site disposal. If street sweeping is only done occasionally, this should be discussed in the revised plan.
4. Under the "disposal of wastes" section in the annual report form, the expectation here is to address wastes that are exposed to rainfall. It's assumed that fluorescent bulbs and electronic waste are generally going to be managed indoors and as such have virtually no chance of contaminating storm water runoff. Likewise for other wastes that are managed in closed containers that are ready for transport.

Conclusions

Based on my review it appears Wright State is doing a satisfactory job of addressing Phase II storm water management requirements. The only obvious need for the program at this point is to revise its storm water management plan so that it accurately describes the extent of its current activities. The intent of the comments provided in this letter is to assist with the preparation of this revised plan.

While there is no specific regulatory requirement for preparing updated storm water plans, a reasonable deadline would be the date on which the new small general MS4 permit is issued in late January, 2014.

If there are questions about anything in this letter, I can be reached at 937.285.6442 or via email at chris.cotton@epa.state.oh.us.

Sincerely,



Chris Cotton
Environmental Specialist
Division of Surface Water

CC/tf

cc: Ohio EPA/SWDO/DSW Files
Anthony Robinson, Ohio EPA/CO/DSW