



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

December 7, 2012

Mr. Jeffrey Agricola
Director of Public Works
City of Springdale
11700 Springfield Pike
Springdale, OH 45246

RE: Stormwater Program Evaluation, NPDES Permit 1GQ00052*AG

Dear Mr. Agricola:

On Thursday, November 1, 2012, I conducted a cursory "Screening Evaluation" of the city of Springdale's Stormwater Management Program. The City was represented during this review by you, Mike Huxsoll, Chris Miller and Brandon Slater. Because of time constraints, Cammie Mitrione and William McErlane were present only at the beginning of the meeting. James Akins and Steve Farst, both of whom are with EMH&T, which is assisting the City with its stormwater program, were also present during this meeting.

The evaluation consisted of discussions about the 6 "Minimum Control Measures" (MCMs) that provide the framework for municipal stormwater programs. The City's original Stormwater Management Plan (SWMP) and recent annual reports were reviewed prior to the meeting.

The intent of the evaluation was to assess program activities and effectiveness, and to discuss ways to improve the City's SWMP. The balance of this letter includes suggestions on how the City can revise its SWMP so that it is easier to read, and more accurately reflects activities Springdale currently conducts as required by its stormwater permit.

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

1. The City's revised SWMP should explain how stormwater information can be accessed from the City's web-based library available through its internet website. A summary of the kinds of information found on the website should be included. Specific links to other websites at which relevant stormwater information can be found should be included as well. Articles or other publications sent to City residents or made available at city hall or other public venues should be archived on line, with directions in the revised plan for accessing this information.

2. The revised plan should include the specific local groups or associations Springdale expects to be involved with in the future, such as the Mill Creek Watershed Organization and the Rain Garden Association. These groups come and go through time, so at some point this section of the SWMP would need to be revised again. Involvement or collaboration with other groups that happens only occasionally can be mentioned in the appropriate year's annual report.
3. The revised plan must discuss storm sewer inlet marking activities, and the extent to which Springdale's storm sewer system has been marked. If all inlets have been marked, the revised plan should state this, then speak to how markers will be maintained or replaced, and which city department is responsible for performing this task.

MCM 3 Illicit Discharge Detection and Elimination (IDDE)

1. The revised SWMP must explain which city department is responsible for housing, maintaining and updating the storm sewer system map when the need arises.
2. The revised plan should explain the basics of the illicit discharge ordinance, with emphasis on the section(s) that allows city officials to investigate suspected sources of illicit discharges to its storm sewer network. Penalty provisions contained in the ordinance should also be discussed in the revised plan.

The ordinance can be included in its entirety as an attachment or appendix to the revised plan, or made available via the City's website. If the latter option is chosen then the web address or link must be included in the revised plan.

3. The revised plan must state that no home septic systems are thought to be present within Springdale's jurisdiction.
4. The revised plan should explain what would be done to identify an illicit discharge if dry weather screening reveals that something other than water is coming from one of the City's storm sewer outfalls. Would basic chemical screening be done in the field through use of pH paper or Hach kits, or would a sample be obtained and sent to a local lab? While it's impossible to predict what sorts of situations may occur, the SWMP must include the basic approach the City might take in the rare instance when an unknown substance is found coming from a storm sewer outfall.
5. Springdale has yet to screen its storm sewer outfalls during dry weather, but has until the end of the current permit term to do so. The revised plan should discuss a schedule the City thinks it can implement to ensure that all its storm sewer outlets are screened at least once during the next 5 year permit term.

MCM 4 - Construction Site Stormwater Runoff Controls

1. The city of Springdale's revised SWMP must describe the review process that is followed by regulated construction projects (those disturbing more than one acre of ground), from initial proposal to final approval. The point(s) at which attention is given to erosion and sediment controls, and other potential pollutants such as concrete washout, should be highlighted in this discussion.

2. The revised SWMP should contain example copies of checklists or other forms used to document construction site erosion and sediment control inspections. These forms can be included in an appendix or as an attachment to the plan.
3. The revised SWMP's narrative should also include the key language from its ordinance that supports erosion and sediment control requirements imposed on new developments that disturb more than one acre of land. The entire ordinance can either be included as an attachment or appendix to the revised SWMP, or the plan can include web links that could be followed to access the ordinance on line.

MCM 5 – Post Construction Stormwater Runoff Controls from New Development

1. Springdale's revised SWMP must include references to the section of its code that addresses post construction water quality requirements. In particular, language that discusses water quality volume (WQV) requirements should be included {from section 151.04(A)(4)}, along with reference to the list of accepted post-construction best management practices (BMPs) as contained in Ohio EPA's general construction permit.
2. The revised plan must elaborate on how the City addresses operations and maintenance (O&M) of installed post-construction practices at newly developed properties. From our discussions it was learned that Springdale intends to tie O&M requirements to language in property deeds, or covenants that go with the property. If both options will be used, then each should be summarized in the revised plan, with the differences between the two explained. How the City proposes to enforce terms of the agreements must also be discussed in the revised plan.

The plan must also explain where in the project review process discussions about O&M requirements takes place.

3. Because the City is largely built out, the likelihood of widespread use of post construction practices in the future is very small. The narrative portion of the revised plan should speak to this fact.

MCM 6 Pollution Prevention/Good Housekeeping

A review of Springdale's 2011 Stormwater Program Annual Report confirms that the City is reporting information required of MS4s. But the City's SWMP needs to be revised in the following ways:

1. The revised plan should explain that the city of Springdale's employees are certified to apply pesticides and herbicides, and summarize the training needed to attain certification. As in the past, amounts of various materials applied can be provided in subsequent annual reports.
2. The revised plan should discuss how the City follows the "sensible salt" program developed by the Salt Institute for wintertime road deicing, and that the City has been recognized for the excellence of its salt storage practices. Amounts of salt used during the winter can continue to be provided in subsequent annual reports.

3. The collection and disposal of street sweepings must be discussed in the revised SWMP. Total amounts of sweepings collected can be provided in annual reports, but the plan itself must describe how collected material is managed prior to disposal.

Temporary storage of collected street sweepings either in exposed piles or in open dumpsters should be reconsidered if there is potential for stormwater that comes in contact with the sweepings to run off the property. Because street sweepings are by definition solid waste, water that comes in contact with them is considered leachate that cannot be legally discharged from the property.

4. The revised plan should also speak to future opportunities the City may have to reduce its use of road salt, pesticides, herbicides and fertilizers, assuming such opportunities exist that are not directly related to budgeting issues.

Conclusions

Based on my review and our discussion it appears the city of Springdale is doing a satisfactory job addressing Phase II stormwater management requirements. The only obvious need for the program at this point is to revise its stormwater management plan so that it more 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 stormwater 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.ohio.gov.

Sincerely,



Chris Cotton
Environmental Specialist II
Division of Surface Water

CC/tb

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