



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

December 11, 2012

Mr. Bob Mason
Stewardship Manger
Hamilton County Parks District
10245 Winton Road
Cincinnati, OH 45231

RE: Storm Water Program Evaluation, NPDES Permit # 1GQ00026*BG

Dear Mr. Mason:

On Thursday, November 15, 2012, I conducted a cursory "Screening Evaluation" of the Hamilton County Park District's (HCPD) storm water management program. The district was represented during this review by you, Kevin Brill, Doug Burger, Bob Harris, and Bret Henninger, Park Director. Jack Sutton was briefly present at the beginning of the meeting.

The evaluation consisted of discussions about the 6 "Minimum Control Measures" (MCMs) that provide the framework for regulated storm water programs. HCPD's original storm water 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 update the SWMP and improve its accuracy.

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

1. HCPD must revise its SWMP to include internet website addresses from which storm water management information relevant to the district can be obtained. The revised plan should include links to other websites (Ohio EPA, USEPA, Hamilton County Storm Water District, etc.) where general storm water management information can be accessed.
2. The park district is a tremendous resource that is capable of providing information about a wide range of environmental topics. For the purposes of the small MS4 general permit, however, the revised SWMP and subsequent annual reports need to focus specifically on park district activities that can be linked in some tangible way to storm water management issues.

3. The revised SWMP should discuss the archiving of information about storm water issues that was included in previously published documents, such as Evergreen Magazine. Web addresses or links should be provided in the revised plan that will allow access to such archived materials.
4. The revised plan should discuss some of the approaches the Park District takes in assessing the effectiveness of its educational efforts as they relate to storm water management issues.

MCM 3 - Illicit Discharge Detection and Elimination

1. The SWMP should be revised to incorporate changes made in 2009 to Hamilton County's illicit discharge regulations, if said changes impact the way in which an illicit discharge would be handled. A summary of the most relevant regulations, and where they're found in the code, can be included in the revised plan's narration, with the entire ordinance provided as an appendix to the plan.
2. There has been some confusion about the number of outfalls present within HCPD's storm sewer network. This apparently resulted in an unreasonably high number of outfalls being reported. The revised plan should include the revised number of storm sewer outfalls now thought to be present. (See the definition of "outfall" provided on page 22 of the current small MS4 general permit.)
3. The revised plan must include the schedule the park district thinks it will follow for performing dry weather screening of its storm sewer outfalls. The current requirement is that each outfall be screened at least once during the permit's 5 year term.
4. Note that the thousands of water samples collected by both HCPD staff and volunteers in 2011 are not relevant to the district's storm water program, in the context of outfall screening. Sampling and analyses are only required when unknown substances are being discharged from outfalls under the control of the park district.

MCMs 4 and 5 - Construction and Post-Construction Storm Water Runoff Control

1. While HCPD is involved with every step of proposed construction projects within its jurisdictional area, such projects are technically regulated by the municipality in which the property is located. Since it's not reasonable to list each respective jurisdiction's specific requirements, the broader framework of recently revised county regulations (which emphasize erosion and sediment controls) should be discussed in the narrative of the revised plan.

2. The revised plan should contain examples of checklists or other forms used by HCPD to document inspections of erosion and sediment controls at construction sites.
3. The revised plan should include a summary discussion about how new building projects on park district property (which are large enough to require construction storm water permits) meet post-construction water quality volume requirements. The revision should also discuss how future operation and maintenance of post-construction best management practices, particularly structural practices, would be ensured, and who would be responsible.

MCM 6 – Pollution Prevention/Good Housekeeping

We didn't spend much time discussing this particular part of HCPD's program, but from annual reporting information, it appears the district is providing requested information regarding the amounts of various materials used within its jurisdictional area.

The revised plan should speak to future opportunities that may exist to reduce the amounts of road salt, pesticides and herbicides used within park territory.

Conclusions

The Hamilton County Park District appears to be doing a good job addressing the requirements of the current small MS4 general storm water discharge permit. The original SWMP submitted in 2003 remains surprisingly accurate, though revisions are needed in a few sections of the document, as alluded to throughout this letter. The District should aim to have a revised plan prepared by the time the revised small MS4 general permit is issued, which is tentatively set for late January, 2014.

If you have questions about any of the information provided 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 2
Division of Surface Water

CC/tb

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

