

# Hamilton County Storm Water District E-Newsletter Summer 2021



## Quarterly News & Updates from your Partners at the Hamilton County Storm Water District

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### Stand Alone SWP3 Requirement

In Hamilton County, construction projects that disturb one or more acres of land or are part of a larger common plan that will disturb one or more acres are required to submit a Storm Water Pollution Prevention Plan (SWP3) for review. **The SWP3 shall be a comprehensive stand-alone document** containing all information required by the Ohio EPA Construction General Permit and the Hamilton County Storm Water District Rules and Regulations.

The SWP3 shall identify potential sources of pollution which may affect the quality of storm water discharges associated with construction activities. In addition, the SWP3 shall describe the implementation of storm water management controls that reduce the pollutants and impact of storm water discharges during construction and pollutants associated with the post-construction land use.

The SWP3 is reviewed by the Hamilton County Soil & Water Conservation District and the Hamilton County Storm Water + Infrastructure Department. [Click Here](#) to view the Hamilton County Storm Water District MS4 Plan Review Checklist.

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### MS4 General Permit Impacts

[Impacts of the 2021 Ohio EPA MS4 General Permit](#)

On April 1, 2021, Ohio EPA released its latest Small Municipal Separate Storm Sewer System (MS4) National Pollutant Discharge and Elimination System (NPDES) General Permit loaded with new or enhanced compliance requirements for MS4 communities in Ohio. The permit is available on the Ohio EPA website at: [https://www.epa.ohio.gov/dsw/permits/GP\\_MS4StormWater](https://www.epa.ohio.gov/dsw/permits/GP_MS4StormWater). Ohio EPA established an April 1, 2022 deadline for updating the existing storm water management program (SWMP) to meet new permit requirements.

The scope of changes to the permit ranges from small recordkeeping and reporting adjustments to large programmatic activities requiring commensurate increases in resources necessary to comply. Perhaps the most striking changes are additional, prescribed performance standards for identified total maximum daily load (TMDL) pollutants in MS4 communities located at least partially in one or more TMDL watersheds. Appendix A of the permit lists the affected MS4 communities and associated identified TMDL pollutants.

This article provides an initial overview of major new requirements for each minimum control measure (MCM). Note that these are in addition to existing permit requirements. A more detailed analysis of impacts and their associated timelines – as it relates to the Hamilton County Storm Water District (District) can be found [Here](#). As the revised SWMP is being developed, more detailed implementation strategies will be released for feedback.

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### **MCM 1 Education & Outreach Impacts**

- Tailor education and outreach materials and activities to target identified TMDL pollutants for affected MS4 communities at least once during the permit term. Multiple pollutants can be incorporated into these activities.
- Identify the target pollutants associated with these activities and an estimate of the people reached within the affected MS4 communities in the annual report.

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### **MCM 2 Public Involvement/Participation Impacts**

- Target each identified TMDL pollutant in public involvement activities for applicable MS4 communities as part of the permit-required minimum of five activities during the permit term. Multiple pollutants can be incorporated into these activities.
- Identify the target pollutants included in each activity and an estimate of the people reached within the affected MS4 communities in the annual report.

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### **MCM 3 Illicit Discharge Detection & Elimination (IDDE) Impacts**

- Include all public and private post-construction controls – including the type of practice for each – in the comprehensive MS4 map within 5-years.
- Implement enforcement protocols in the illicit discharge regulations to the extent allowable under state law.
- Evaluate and revise priorities and goals each year based on data collected under the outfall surveillance program.
- Notify Ohio EPA of all identified cross-connections or leaking/broken sanitary sewer lines contributing to the MS4 within 24 hours.

- Include a list of identified, but not eliminated, illicit discharges including estimated volume, source, type of discharge, types of pollutants, and receiving waters in the annual report.
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#### **MCM4 Construction Site Storm Water Runoff Control Impacts**

- Develop a written enforcement escalation plan for unresolved issues at construction sites
  - Develop and retain copies of software or checklist for SWP3/plan reviews as well as retaining documentation of communications related to these reviews.
  - Use standardized checklists for all MS4 construction site inspections within one year.
  - Demonstrate compliance with erosion and sediment control regulations including a written enforcement escalation plan.
  - Increase construction site inspection frequency to every 14 days – for MS4 communities with identified total suspended solids and nutrient TMDLs – when one or more of the following issues are identified and until those issues are resolved:
    - *Construction started without MS4 review and approval of SWP3*
    - *Failure to install sediment basins 7 days prior to grading and/or grubbing*
    - *Failure to implement sediment and erosion controls, or*
    - *Dewatering of turbid discharges*
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#### **MCM 5 Post-Construction Storm Water Management Impacts**

- Require long-term operation and maintenance plans for post-construction controls to be in place for each site – including provisions for change in ownership. The MS4 must retain copies of these plans.
- Ensure long-term operation and maintenance of post-construction controls – to include changes in ownership. Enforcement protocols and mechanisms must be in place.
- Use standardized software or checklists for SWP3/plan reviews and retain completed checklists and communications related to these reviews.
- Use standardized checklists for all post-construction control inspections.
- Conduct at least one inspection of each post-construction control during the permit term.
- Begin implementation of one of the following within two years for each community within a TMDL watershed:
  - Retrofit an existing stormwater practice to meet performance standards in permit, or
  - Restore at least 300 feet of channelized stream, or
  - Update ordinance to require use of green infrastructure where feasible, or
  - Install a green infrastructure practice to treat 1 acre of impervious surface developed prior to 2003

This activity can be performed by multiple MS4s increasing the size of the feature for each added community.

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#### **MCM 6 Pollution Prevention/Good Housekeeping Impacts**

- Cover all MS4 salt piles within two years to achieve no run-on and

subsequent run-off containing salt.

- Provide secondary containment or bollard/barrier protection within two years for tanks containing brine or deicing fluids.
- Implement new, shorter timelines established for stabilization after ditch/MS4 maintenance within two years.
- Implement one of the following in the portion of each community located in a TMDL watershed within two years:
  - A street sweeping program - all curbed streets twice a year, or
  - A catch-basin cleaning program - all catch basins at least once every 5 years, or
  - A leaf/yard waste collection program, or
  - For small MS4 facilities that do not require an NPDES industrial storm water general permit coverage, conduct and document at least quarterly facility inspections.
- Include the quantity and location of disposed MS4 wastes, street sweepings, and catch basin cleaning materials in the annual report.
- Document quantities of salt, brine, pesticides, herbicides, and fertilizer used by MS4 facilities in the annual report.

## MCM 6 : Good Housekeeping & Pollution Prevention Training

It is time to schedule this year's training! Hamilton County Public Health is responsible for the development and implementation of MCM 6. This program includes providing training to townships and member municipalities within the District on preventing and reducing pollutant runoff from maintenance facilities.



This year's training consists of a collaboration between HCPH, HCSWCD and the Hamilton County Sheriffs Office.

Please contact Ryan Wuest at [Ryan.wuest@hamilton-co.org](mailto:Ryan.wuest@hamilton-co.org) or by phone at 946-7941 to schedule this year's training.

## Facility Storm Water Plan

The Hamilton County Storm Water District, to meet Ohio EPA permit requirements, has developed the Facility Storm Water Plan (FSWP) fillable pdf forms to help reduce introduction of pollutants from government facilities into local waterways.

The FSWP forms must be completed every year for each identified MS4 facility in your community. Between now and November 5, 2021, a facility walkthrough must be conducted as part of this process. CDM Smith is providing assistance in performing these walkthroughs at no additional cost to

your community.

Please contact Jessica Doty at [dotyje@cdmsmith.com](mailto:dotyje@cdmsmith.com) to schedule a date and time for a walkthrough. If you want to perform the walkthrough on your own, request a copy of this year's forms from Jessica Doty and plan to send the unsigned draft FSWP forms to CDM Smith by September 1, 2021 for review and approval before final signature.

## Upcoming Events

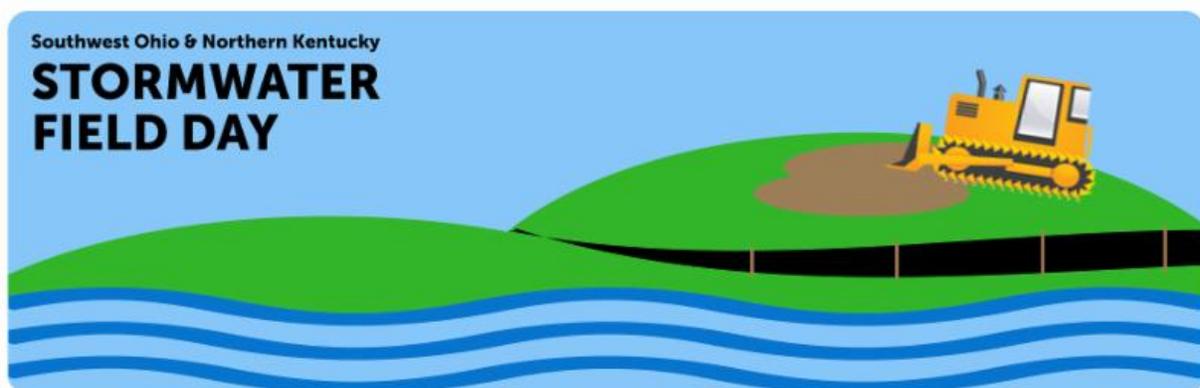
### Hamilton County Soil & Water Conservation District Annual Meeting & 76th Anniversary Celebration- September 16th

# Join us on the farm



Hamilton County Soil and Water Conservation District  
76th Anniversary Celebration  
September 16th, 2021  
4:30-7:30pm  
Gorman Heritage Farm

**[Click Here](#) for more information & to register**



**The Southwest Ohio & Northern Kentucky Stormwater Field Day** is back for 2021. Join the Regional Storm Water Collaborative on **September 23rd** to learn how developers and contractors can meet sediment erosion control and stormwater BMP requirements that protect local waterways.

This day-long workshop will begin on land with demonstrations of BMPs led by experts eager to answer questions and share their knowledge. Attendees will then board a riverboat for lunch and speaker sessions about industry regulations and trends.

**Click here** for additional information and to register for the Stormwater Field Day.

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## Storm Water District Partner's Contact Information



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**Planning +  
Development**

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**PUBLIC HEALTH**

Phone: (513) 946-7800

**Hamilton County**



**Soil and Water  
Conservation District**

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