

**Hamilton County Storm Water District (District) Comments
on the Ohio EPA 2020 Draft MS4 General Permit**

Number	Location(s) in Permit	Comment
<p>Major Topic 1: Fiscal Challenges in Meeting New Performance Standards in the Coronavirus Era. The proposed MS4 General Permit and its requirements, particularly the new performance standards and associated costs, are coming at a very inopportune time as many counties, townships, and municipalities are facing the impacts of the coronavirus pandemic. Each community is experiencing impacts on resources – funding and staff – due to funding shortfalls during the current economic crisis. There are no available resources to implement new programs. The following comments and suggestion are offered:</p>		
1-A	III.B.5. and 6.	<p><u>Permit Proposes New Performance Standards that will Require Substantial and Currently Unavailable Fiscal Resources.</u> Development and implementation of new or expanded programs – even if cooperative efforts or partnerships are acceptable – are nearly impossible now and in the foreseeable future due to reduced fiscal resources available to MS4s in the pandemic economy. The District and its co-permittees want to work with Ohio EPA on program improvements to meet Clean Water Act requirements. At this moment in time it is not financially possible.</p> <p><u>Request:</u> The District is requesting leniency in meeting these new performance standard requirements for at least the next two years – focusing our timelines for beginning the implementation to the end of the Permit term.</p>
<p>Major Topic 2: Applicability of TMDLs to MS4 Permittees. Appendix A of the Permit and references to it in the Permit should clarify applicability to MS4s. The following comments and suggested clarifications are offered:</p>		
2-A	I.B.4. and Appendix A	<p><u>NPDES Permit Requirements Should Only Apply to Areas Draining to MS4s Owned/Operated by a Jurisdiction.</u> It should be clarified in the appendix that what is being permitted is the owner/operator of the outfall of the MS4, not the entire jurisdiction (i.e., it's a point source discharge permit) and that the Permit requirements apply to only those MS4s that are located within a TMDL watershed (or portion of a TMDL watershed) where MS4 discharges were identified as a major source of TMDL pollutant(s).</p>
2-B	I.B.4 and Appendix A	<p><u>MS4 communities in multiple watersheds.</u> Please verify that TMDL performance standards for communities located in multiple watersheds apply only to the parts of the community served by an MS4 operated by the community that discharges to the water body covered by the TMDL. This interpretation was presented at the August 5, 2020 Ohio EPA Virtual Meeting and is consistent with 40 CFR.122.26.a.(v).¹</p>
2-C	I.B.4 and Appendix A	<p><u>Co-permittee MS4 groups in multiple watersheds.</u> Please verify that a co-permittee MS4 group is responsible for meeting TMDL performance standards for TMDL pollutants identified only in those areas within communities served by an MS4 operated by the community that discharges to the water body covered by the TMDL.(i.e., the TMDL performance standards do not apply to co-permittee MS4s in watersheds without existing TMDLs)</p>
2-D	I.B.4 and Appendix A	<p><u>MS4s are not the Primary Contributor of TMDL Pollutants to the Lower Little Miami River.</u> The lower Little Miami River Watershed Total Maximum Daily Load (TMDL) report approved by U.S. EPA on March 28, 2011 calculates TMDLs for E. coli bacteria, total phosphorus, chemical oxygen demand, total suspended solids, and sedimentation and habitat. It lists the two primary causes of aquatic life impairment as the high proportion of fine sediment in the channel and the extremely low water levels due to a drought year. Other stressors include</p>

¹ 40 CFR.122.26.a.(v) Permits for all or a portion of all discharges from large or medium municipal separate storm sewer systems that are issued on a system-wide, jurisdiction-wide, watershed or other basis may specify different conditions relating to different discharges covered by the permit, including different management programs for different drainage areas which contribute storm water to the system.

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		<p>degraded habitat from agricultural drainage and the "armoring" of the stream channel in urban areas (primarily in waters dominated by combined sewer overflows); nutrient enrichment from wastewater plant effluent and cropland runoff, and oxygen demanding substances from inadequately treated storm water at the former ABX Airpark and combined sewer discharges within the Metropolitan Sewer District (MSD). Sources of bacteria are wastewater emanating from sanitary sewer and combined sewer overflows, inadequate treatment from home septic systems, and runoff of bacteria-laden crop fields where manure or sludge are likely applied .</p> <p>Recommendations include point source controls on the airpark, MSD’s combined sewer system, and the Blanchester wastewater treatment plant. Nonpoint source actions include improving home septic systems and implementing conventional management practices that are designed to abate pollutant loading from cropland and urban landscapes.</p> <p>The findings of the TMDL indicate that discharges from MS4s in Hamilton County are not primary contributors to TMDL pollutants and, as such, should not be listed in Appendix A. Specifically:</p> <ul style="list-style-type: none"> • Per the TMDL, CBOD seems to be related to CSO discharges and/or discharges from deicing activities at airports (i.e., a stormwater discharge associated with industrial activities). These types of discharges are not the responsibility of the MS4 or covered under the MS4 General Permit and should not be subject to its performance standards. • E-coli is listed for main stem of Little Miami (but not tributaries outside CSO areas). This would suggest that the primary source would be upstream/agricultural and CSOs, with urban stormwater a secondary (or tertiary) source. As such, we suggest that e-coli be removed as a pollutant to be addressed by MS4s. In addition, the BMPs listed for this TMDL do not appear effective at e-coli control. <p>More generally, Ohio EPA should revise Appendix A to include only those MS4s where the TMDL found MS4 discharges to be a primary source of a specific TMDL pollutant.</p>
<p>Major Topic 3: Permit Lacks Needed Flexibility to Address Local Conditions. The Federal statute states that MS4s are required to control stormwater discharges to the <i>maximum extent practicable (MEP)</i>. As such, MS4s should be provided flexibility in NPDES permits to design stormwater programs meeting the MEP standard as it relates to the specific situations in their systems. While we recognize Ohio EPA’s desire to establish uniform performance standards to clarify compliance requirements and provide clear direction on how to meet TMDLs, many of the new performance standards are overly prescriptive, will not meet the MEP standard in some MS4s, and do not allow MS4s (via their SWMP Plans) to recommend alternative controls that are MEP compliant within their systems. We offer the following comments and provide suggested revisions that we believe achieve Ohio EPA’s objectives while still providing MS4s with the necessary flexibility to determine MEP compliance actions.</p>		
<p>3-A</p>	<p>1.B.4 and Appendix A</p>	<p>TMDL Performance Standards Complicate Compliance. Achieving Permit compliance for different TMDL performance standards within a community, or an entire co-permittee MS4 group, that lies within multiple watersheds may be exceedingly complex, may not be legally feasible, and may not be cost-effective. What consideration has been given to the appropriate level of compliance for this situation?</p> <ul style="list-style-type: none"> • <u>Example 1:</u> Creating a leaf collection program to be implemented in a portion of a community would be complicated (e.g., community or contracted leaf collection crews would need to adhere to detailed service area maps) and may be challenged by residents who pay local taxes but are not receiving this this service. Extending the program throughout the community to be equitable would also increase costs with no TMDL benefits (i.e., it would implicitly require controls beyond the MEP criteria). • <u>Example 2:</u> Creation of a county ordinance requiring developers to use Table 4b (green infrastructure) practices that would apply to only those townships completely or partially

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		located in a TMDL watershed would be complicated. It could also be subject to legal challenges by impacted townships citing adverse economic hardship when developers choose to relocate to areas not impacted by the ordinance.
3-B	III.B.5.f.v.a. – c.	<p>Provide Additional Flexibility to MS4s in Deriving Practicable Control Measures. It is recommended that these performance standards be revised. Requiring implementation of either a retrofit to an existing storm water practice, restoration of a channelized stream, or passing an ordinance requiring use of Table 4(b) or other green infrastructure practices for each MS4 identified in Appendix A be broadened as they may be infeasible for one or more of the following reasons:</p> <ul style="list-style-type: none"> • Older, smaller urban communities may not have existing flood control basins (peak-discharging storm water practices). • Many of the same communities may not have a channelized stream within their jurisdiction. • Older, established, urban communities tend to have little to no development or redevelopment – making passage of an ordinance to mandate use of Table 4(b) practices an ineffective means to improve water quality. <p>Even where it may be applicable, retrofitting a basin or restoring a stream may not be cost-effective to implement. There are communities barely holding their heads above water fiscally now and for the foreseeable future. This would be an unwanted – and in their eyes unwarranted – unfunded mandate. An alternative approach that allows integration of stormwater controls into another required capital improvement project would provide a more cost-effective approach.</p> <p>Suggested language: Replace paragraphs a, b, and c with the following: <i>“Implement a structural stormwater control measure that meets the performance standard for redevelopment projects in Ohio EPA’s latest Construction General Permit as part of a capital improvement project implemented during the Permit term”.</i></p>
3-C	III.B.5.f.v	<p>Allow MS4 Collaboration on Retrofit Projects. It is recommended that the Permit language be revised to allow stormwater control measures to be performed jointly with other entities, MS4s, or co-permittees (i.e., similar to the construction permit allowing “in-lieu of controls in the same watershed) which would allow Permit compliance when the options are infeasible for an individual MS4.</p> <p>Suggested language: Add the following statement to the end of paragraph v: <i>“Should an MS4 community subject to TMDLs demonstrate in their SWMP Plan that it is not practicable to implement a structural stormwater control as part of a capital improvement project, the MS4 is allowed to recommend an equivalent alternative control measure and/or implement a structural stormwater control jointly with other entities, MS4 communities, developers, or co-permittees.”</i></p>
3-D	III.B.5.f.v.c.	<p>Allow MS4s to Define Feasibility of Table 4b requirements. Feasibility is not currently defined under the third (paragraph c) performance standard option. We suggest that the feasibility of Table 4b requirements be determined by the MS4 based on a feasibility determination provided by the developer.</p> <p>Suggested language: Remove Paragraph III.B.5.f.v.c and add the following statement after the first sentence of the second paragraph of Section III.B.5.f.v: <i>“In addition, the MS4 shall require development plans subject to MS4 approval to demonstrate why implementation of a Table 4b stormwater control is not feasible, and if not, define alternative controls that address the TMDL pollutant”.</i></p>

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3-E	III.B.6.e.vii.	<p>MS4s Should be Provided Flexibility to Develop TMDL Performance Standards for MCM6. MS4s should be provided the opportunity to identify alternative BMPs for addressing TMDL pollutants when the Permit’s performance standard options are not applicable to the identified TMDL pollutant or are infeasible. While providing a set list of BMP options to choose from is a straightforward approach to Permit compliance, the BMP options in the draft Permit may not apply to certain settings or may not be appropriate for specific TMDL pollutants. The TMDL performance standard options - street sweeping, catch basin cleaning, and leaf collection programs – should be revisited and revised to provide options that better match their effectiveness in improving water quality for each TMDL pollutant. The current performance standard options are not equally effective in improving local water quality for the listed TMDL pollutants. For example:</p> <ul style="list-style-type: none"> • Development and implementation of new street sweeping, catch basin, and leaf collection programs could be cost-prohibitive to some MS4 communities and may not be appropriate if those communities do not have curb and gutters. • Leaf collection programs may not be applicable in areas of low-density development. • Street sweeping and catch basin cleaning have proven to be only modestly effective in reducing water quality impacts related to nutrients.² • Sources other than MS4s (e.g., HSTS, combined sewer, and sanitary sewer programs) are primary contributors of e-coli. <p>One suggestion would be to revise this section of the Permit to include a matrix identifying suitable performance standard options for addressing the individual TMDL pollutants as an efficient way to provide a wider, more appropriate selection of alternatives.</p> <table border="1" data-bbox="480 1037 1312 1373"> <thead> <tr> <th>TMDL Performance Standards & Applicable TMDL Pollutants</th> <th>TSS</th> <th>Nutrients</th> <th>E.coli</th> <th>Bacteria</th> <th>Metals</th> <th>DO & Organic Enrichment</th> </tr> </thead> <tbody> <tr> <td>Option 1</td> <td>X</td> <td></td> <td></td> <td></td> <td>X</td> <td></td> </tr> <tr> <td>Option 2</td> <td>X</td> <td>X</td> <td></td> <td></td> <td></td> <td>X</td> </tr> <tr> <td>Option 3</td> <td></td> <td></td> <td>X</td> <td>X</td> <td></td> <td></td> </tr> <tr> <td>Option 4</td> <td></td> <td>X</td> <td></td> <td></td> <td></td> <td>X</td> </tr> <tr> <td>Option 5</td> <td></td> <td>X</td> <td>X</td> <td>X</td> <td></td> <td>X</td> </tr> </tbody> </table> <p>In addition, the Permit should be revised to allow the MS4 some flexibility to include alternate BMPs that are appropriate for identified TMDL pollutants in their SWMP.</p> <p>Suggested Language: <i>“Should implementation of one of the above performance standards be cost-prohibitive for an individual MS4 or co-permittee, there are two options:</i></p> <ol style="list-style-type: none"> <i>1. The MS4 or co-permittee could propose an alternative to this requirement from Ohio EPA, or</i> <i>2. The MS4 or co-permittee may participate in a collaborative effort to create such a program allowing multiple communities to share equipment and personnel.”</i> 	TMDL Performance Standards & Applicable TMDL Pollutants	TSS	Nutrients	E.coli	Bacteria	Metals	DO & Organic Enrichment	Option 1	X				X		Option 2	X	X				X	Option 3			X	X			Option 4		X				X	Option 5		X	X	X		X
TMDL Performance Standards & Applicable TMDL Pollutants	TSS	Nutrients	E.coli	Bacteria	Metals	DO & Organic Enrichment																																						
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3-F	III.B.6.e.vii.1.	<p>Street Sweeping Performance Standard does not Meet MEP Standard. Requiring street sweeping 4 times per year appears to be an arbitrary metric and is unlikely to result in tangible TMDL pollutant control. While frequency is an important consideration for a street sweeping program and more frequent sweeping should, theoretically, result in more material</p>																																										

² 2016, Schueler, Giese, Hanson, and Wood, “Recommendations of the Expert Panel to Define Removal Rates for Street and Storm Drain Cleaning Practices,” Chesapeake Stormwater Network, Chesapeake Research Consortium, and Virginia Tech (review of more than 100 research papers from 2006 through 2016)

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		<p>collected, it is not the only factor in reducing pollutant loads in nearby waterways. A major factor affecting quantity of materials removed is the average daily traffic on each roadway. Roads with higher daily traffic are more likely to accumulate pollutants, including solids and metals. Sweeping those roadways with higher average daily traffic rates at a much more frequent rate has a greater potential to have a positive impact on reducing water quality impact from roadway runoff. The seasons also impact sweeping locations and frequency – with higher sweeping frequency scheduled for fall months on wooded roadways. It is suggested that the Permit language be modified to read:</p> <p>Suggested Language: <i>“Develop and implement a proactive street sweeping program that prioritizes curbed roadways with the highest average daily traffic rates for more frequent sweeping and adjusts the scheduling and frequency of sweeping of all roads to accommodate the fall leaf season.”</i></p> <p>Clarification: The District is also seeking a definition of “proactive” as applied to the proposed performance standard.</p>
Major Topic 4: Confirm that SWMPs may include Implementation Schedules for New Performance Standards established in this Permit		
4-A	General	Verify that MS4s will be able to include implementation schedules in their SWMP for new Permit requirements and the new performance standards. Many of these new requirements have budgetary and resource allocation implications that may require time to complete implementation.
4-B	III.B.6.e.	Based on information presented at the August 5, 2020 Ohio EPA Virtual Meeting, phased implementation of the new pollution prevention/good housekeeping requirements should be allowed, with the schedule included in the revised SWMP Plan. A number of the proposed performance standard minimum requirements are new and will take time and funding to implement (e.g., secondary containment; bollard or barriers for brine tanks, development and implementation of a storm water outfall and drainage system maintenance program to ensure that stable outfalls and conveyances are provided, development of a street sweeping program). These will require at least a year to put into a village, city, or township budget.
Major Topic 5: 180 Days in Inadequate to Revise the SWMP and meet MCM2 Public Involvement Requirements		
5-A	II. A.4. and III.A.2.	It is recommended that the proposed timeframe for submittal of a SWMP meeting the new Permit requirements be increased from the proposed 180 days, dramatically decreased from the two years in the existing Permit, to two years to allow adequate time for public involvement required under minimum control measure (MCM) 2. The proposed 180 days is inadequate to accommodate stakeholder involvement in developing the SWMP, providing the opportunity for public review and comment on the draft SWMP, meeting public noticing timelines, holding public meetings/hearings, and for addressing and incorporating responses to public comments.
Major Topic 6: Restricting IDDE Dry Weather Screening to Outfalls Is Inconsistent with IDDE Prioritization Requirements of the Permit		
6-A	III.B.3.j.i.	To be consistent with 40 CFR.122.34 (b)(3)(iii), ³ the Permit language should be revised to allow renewing MS4s and co-permittee MS4 groups who have performed field screening of their outfalls in prior Permit terms to have the option to propose alternative field screening

³ 40 CFR.122.34 (b)(iii)³ which states the USEPA “recommends that the (small MS4) permit require the plan to detect and address illicit discharges include the following four components: Procedures for locating priority areas likely to have illicit discharges; procedures for tracing the source of an illicit discharge; procedures for removing the source of the discharge; and procedures for program evaluation and assessment. EPA recommends that the permit require the permittee to visually screen outfalls during dry weather and conduct field tests of selected pollutants as part of the procedures for locating priority areas.” (emphasis added)

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		<p>methods under III.B.3.j.i. (field screening of all outfalls or a maximum of 1000 outfalls) and focus their IDDE Permit compliance on III.B.3.j.ii. by developing and implementing a long-term system-wide surveillance program based on a prioritized approach focused on areas likely to have illicit discharges.</p> <p>It is also recommended that the Permit be revised to allow an alternative approach to allow field screening sites other than outfalls that reflects knowledge gained about the inefficiencies of outfall field screening and is consistent with the flexibility to use field screening sites other than outfalls provided under the Ohio EPA draft MS4 General Permit section III.B.3.i.iii.1.</p> <p>Dry-weather field screening of all MS4 outfalls as a mandated approach to illicit discharge detection has proven to be an inefficient use of resources as it does not recognize the fact that most illicit discharges tend to be transient in nature. The likelihood of an illicit discharge being present on any single day has proven to be quite small.</p> <p>Application of this approach to the Hamilton County Storm Water District's 9,969 field screening locations yielded 753 sites exhibiting flow during screening, of which 438 were further screened and cleared, 284 were investigated and cleared, and 31 were confirmed illicit discharges – or only 0.03% of the outfall site inventory. This is not a sustainable use of resources based on the rate of return. By comparison, during the first six months of 2020, 30 illicit discharges have already been confirmed while implementing proven, practical, reactive portions of a gained knowledge-based approach – MCM6 training, education and outreach activities, the availability of public reporting mechanisms, and responses to reported potential discharges. The proactive, prioritized long-term surveillance approach following language in the current Permit – based on knowledge gained about illicit discharge source types during the past two Permit terms – is under development and has a much higher likelihood of detecting, and eventually eliminating, illicit discharges – which is the overarching goal of this program.</p> <p>Suggested language: Insert after existing language in III.B.3.j.i.: <i>“In lieu of this performance standard, renewing MS4s and co-permittee MS4 groups who can demonstrate they have performed dry-weather field screening of their outfalls in prior Permit terms may propose alternative field screening methods and locations based upon a prioritization developed using previous program findings.”</i></p> <p>Suggested language: Revise III.B.3.j.ii. to read: <i>“...specific investigation of outfalls or other field screening sites and their tributary area where previous surveillance demonstrates a high likelihood of illicit discharges.”</i></p>
6-B	III.B.3.j.viii.b.-e. (renumbered)	If the Permit changes to allow an alternative to performing outfall dry weather screening (see Comment 8 above), items b. through e. should be modified to read <i>“... outfalls or other field screening sites which had...”</i>
Major Topic 7: Salt Storage – Applicability and Alternatives to Proposed Requirements		
7-A	III.B.3.j.v.	<p>Salt is not an identified pollutant in TMDL watersheds. Ohio EPA has publicly stated that the requirement to adopt an ordinance addressing its storage at commercial, institutional and non-NPDES industrial facilities in this Permit is to address ground-water contamination – not a surface water runoff or surface water quality issue. Additionally, the relatively small salt storage footprint has a much smaller potential impact on groundwater than widespread application to address snow and ice events.</p> <p>It is recommended that this requirement be addressed under a different regulatory framework.</p>

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7-B	III.B.3.j.v.	<p>It is recommended that the requirement to regulate the manner of salt storage at commercial, institutional and non-NPDES permitted facilities be modified. Many MS4s (e.g., County, County Health, and/or specific cities, villages, and townships) may not have the legal authority to impose such regulations on private property.</p> <p>Alternatively, to allow time for eventual issuance of regulations related to salt storage at commercial, institutional and non-NPDES permitted facilities, it is suggested that the MS4 be allowed to present a phased schedule in the SWMP Plan for implementation of the new salt storage requirements that starts with an education campaign and leads to proposed regulations and enforcement provisions later in the Permit term that is targeted toward major sources where education did not achieve appropriate control..</p>
<p>Major Topic 8: MCM6 Reporting Requirements Do Not Reflect Compliance. The HCSWD has maintained since EPA first proposed its current MCM6 reporting requirements that reporting quantities of materials used and/or of wastes collected by MCM6 programs is NOT an appropriate measure of program compliance and may, in fact, be misinterpreted because many factors other than the effectiveness of the MCM6 program affect quantity use/collection. As such, we propose that instead of incorporating performance standards that require reporting of information irrelevant to MCM6 compliance, the performance standards and reporting requirements be re-imagined to those that do properly measure compliance. Specific comments and recommended language follow.</p>		
8-A	III.B.6.e.viii.c and g.	<p>Reporting Waste Collection and Disposal Effectiveness. Obtaining the specific information related to tracking metrics may prove problematic to MS4s. For example, based on knowledge gained during MCM6 operation and activity reviews, most street sweeping is contracted out and the MS4 is billed by miles swept. The actual amount collected is typically not available if the contracted operator services more than one community prior to taking the entire load to a disposal facility. Many communities perform catch basin cleaning on an ongoing basis while performing other tasks and do not have the means to measure the amount of material collected. It is typically only the larger communities who can afford regularly planned catch basin cleaning programs.</p> <p>Street sweeping and catch basin cleaning is typically targeted toward times and areas of extreme deposition which can vary from year to year – e.g., following winter deicing, leaf collection, and special events such as festivals and street fairs. Disposal locations for collected MS4 waste, street sweepings, and catch basin cleaning material can change over the course of a year.</p> <p>It is suggested that the Permit language be changed as follows:</p> <ul style="list-style-type: none"> • III.B.6.e.viii.c. should be changed to <i>“Document the types of wastes generated by your small MS4 and your municipal operations, the pollution prevention practices employed while properly disposing these wastes, the disposal location(s), and the pollution prevention practices used to control run-on/runoff from these locations.”</i> • III.B.6.e.viii.g. should be changed to: <i>“Document the miles of streets swept and number of catch basins cleaned.”</i>
8-B	III.B.6.e.viii.d.-f.	<p>Reporting Pollution Prevention/Good Housekeeping Practices for Material Storage and Use. There are many factors that affect use of salt and other deicing agents, pesticides, herbicides, and fertilizer that are beyond the control of the MS4. Those that are universal include geography, site conditions, and weather patterns. Salt and deicing solutions depend on type of roadway and road conditions; pesticides and herbicide use can increase or decrease in types and extent of infestations. Reporting annual usage independent of these factors could misrepresent their use.</p> <p>Suggested Language: Replace paragraphs d, e, and f with the following: <i>“Describe the pollution prevention/good housekeeping practices used when applying and storing deicing materials, pesticides, herbicides, and fertilizers, and the rationale for any changes in the use of these materials over the previous year,”</i></p>

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8-C	III.B.6.e.viii.c.-g.	<p>Implementation of Compliance Tracking Systems. Adding these reporting requirements presents a data collection/reporting burden to many MS4 co-permittees who do not currently maintain such records.</p> <p>Suggested Language: <i>“The MS4 has the option to provide a timeline in the SWMP for development of programs or mechanisms to implement the new requirements for tracking of pollution prevention/good housekeeping practices for MS4 wastes and disposal locations; salt storage and usage; pesticides, herbicides, and fertilizer used; and street sweeping and catch basin activities, and the disposal locations.”</i></p>
8-D	IV.C.	<p>Required Changes to Ohio EPA’s Annual Reporting Format. There have been issues with the use of the online Ohio EPA eBusiness Center for submittal of annual compliance reports over the last couple years (e.g., incorrect document status appearing and replacement of punctuation marks with upside-down question marks after the information is entered online). At the August 5, 2020 Ohio EPA Virtual Meeting it was stated that the online forms are being updated – it is hoped that these issues are part of those updates.</p> <p>At the same meeting, a statement was made that revisions were being considered to accommodate co-permittee MS4 groups. If the format is to change dramatically – e.g., a separate set of forms is to be completed for each co-permittee – that would greatly increase the time it takes to complete these forms and for little gain – the total Permit compliance numbers for our District would be the same. As a large co-permittee MS4 group, we are offering assistance in developing and/or reviewing these changes to the online forms. (Other attendees at the meeting requested an opportunity to review these changes to the online forms.)</p>
Major Topic 9: Other Comments		
9-A	General	The Permit uses the “P” , in SWMP, to mean Program in some cases, Plan in others. Our understanding of Federal and State regulations is that the “P” should mean “Program.” The proper term should be determined and made consistent throughout the Permit.
9-B	III.B.3.j.vii.	This sub-section is listed twice.
9-C	III.B.3.j.viii.	Currently listed as III.B.3.j.vii. Should this be III.B.3.j.viii?
9-D	III.B.4.c.iv.a.1.	“....completed” should be replaced with “reviewed and approved by the MS4” to comply with the Ohio EPA Construction General Permit requirements and help greatly reduce the likelihood of this situation occurring.