CITY OF HILLIARD
STORMWATER MANAGEMENT PROGRAM

Permit Period 2021-2026
Ohio Environmental Protection Agency Issued Permit No.: 4GQ10008*DG

DRAFT – December 14, 2021

Table of Contents

Certification ii
Executive Summary 1
Legal Authority 1
Permit Coverage Area 1
Reporting Requirements 2
Stormwater Management Program (SWMP) 2
MCM 1: Public Education/Outreach 4
MCM 2: Public Participation/Involvement 9
MCM 3: Illicit Discharge Detection and Elimination (IDDE) 13
MCM 4: Construction Site Runoff Control 17
MCM 5: Post Construction Stormwater Management in New Development/ Redevelopment 21
MCM 6: Pollution Prevention/Good Housekeeping for Municipal Operations 26

FIGURES

Figure 1- Table of Organization

APPENDICES

Appendix A - OEPA NPDES Permit Approval Letter
Appendix B – IDDE Plan
Appendix C – OEPA Illicit Discharge Identification Form
Appendix D – SWP3 Review Checklist
Appendix E – CSECI Inspection Checklist
Appendix F – Construction Program Escalation Plan
Appendix G – Post-Construction Program Escalation Plan
Appendix H – SWMP Modification Log

CITY OF HILLIARD

Certification

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

_____

Clark Rausch, P.E.
City Engineer, Director of Engineering Division
City of Hilliard, Ohio

For discussion:

- Per City Code 951, The Director of Service shall monitor the design, operation, maintenance, inspection, construction and use of Storm Sewers, Storm Drains, and stormwater Facilities in the City.

- The City of Hilliard Charter, Section 5.02, identifies the Director of Public Service of Hilliard as having "charge of all public works and improvements and the construction thereof, of all engineering and inspection in connection therewith, and of all building inspection." Therefore, the Director of Public Service is the signatory authority for this program.

Executive Summary

The City of Hilliard is required to prepare a stormwater management program (SWMP) in accordance with 40 CFR 123.25 and Ohio law (OAC 3745-39). This document outlines the City's program to develop, implement and enforce a stormwater management program designed to reduce the discharge of pollutants to the maximum extent practicable, to protect water quality, and to satisfy the appropriate requirements of the Clean Water Act (CWA) in accordance with the Ohio Environmental Protection Agency (OEPA) National Pollutant Discharge Elimination System (NPDES) Phase II program.

The overall goal of the program is to protect water quality by reducing or preventing pollutants from mixing with stormwater runoff, to the maximum extent practicable, that flow into the City's owned and operated small municipal storm sewer system (MS4) and into waterways. A MS4 system is a conveyance or system of conveyances that are owned and operated by the City that are designed or used for the collecting and conveying solely stormwater into surface waters of the state.

Components of the overall MS4 system consist of the following:

- Storm sewer pipe and catch basins
- Stormwater outfalls
- Roadway curbs and gutters
- Ditches and constructed channels
- Post-construction water quality Best Management Practices

The SWMP addresses the Six Minimum Control Measures as required by state regulations. The program also identifies the City's legal authority to implement the requirements of the OEPA's general permit, OHQ000004, in effect from April 1, 2021- March 31, 2026.

Legal Authority

The Charter and Code of the City of Hilliard provides the City with the authority to control the quality of separate stormwater discharge from its MS4. The City of Hilliard has both the fiscal resources and legal authority to fully implement its SWMP. The City has adopted this SWMP for the permitting period, 2021-2026. Per City Code Chapter 951, the Director of Service shall monitor the design, operation, maintenance, inspection, construction and use of Storm Sewers, Storm Drains, and stormwater facilities in the City.

A copy of the OEPA NPDES permit coverage approval letter is provided within Appendix A.

Permit Coverage Area

The SWMP traverses all areas within the incorporated City limits. The City of Hilliard has an estimated population of 36,534 (US Census Bureau, 2019) and encompasses approximately 14.45 square miles.

The City of Hilliard is largely residential, with office/commercial non-residential areas concentrated along Leap Road, Interstate 270 and within the Old Hilliard portion of the City. Some industrial areas are located on the east side of the City, along the I-270 corridor.

Reporting Requirements

The City of Hilliard will submit its required update annually to the OEPA during the permit cycle. The report will include the status of compliance with the permit conditions, an assessment of the appropriateness of the best management practices (BMPs) and progress towards achieving measurable goals for each of the Six Minimum Control Measures.

A summary of the activities the City will undertake during the subsequent annual reporting cycle and any changes to the BMPs or measurable goals will be included in the annual report.

Stormwater Management Program (SWMP)

The SWMP outlines the Six Minimum Control Measures that are expected to result in reductions in the adverse effects of polluted stormwater discharged to waterways in the City of Hilliard.

The Six Minimum Control Measures (MCMs) are:

1. Public Education and Outreach
2. Public Participation/Involvement
3. Illicit Discharge Detection and Elimination
4. Construction Site Stormwater Runoff Control
5. Post Construction Stormwater Management in New Development and Redevelopment
6. Pollution Prevention/Good Housekeeping for Municipal Operations

Each measure is addressed separately within the program. Generally, the program identifies the strategies, existing programs and proposed programs for each minimum control measure. A table of organization outlines who will be responsible for completing each Minimum Control Measure under this permit (Figure 1).

The City is located within two watersheds: the Scioto River watershed and the Big Darby Creek watershed. These assessment units are very large, and do not reflect individual tributaries serving Hilliard.

The Scioto River is located along the eastern perimeter of the City. Hilliard-specific major waterways within this watershed consist of: Hayden Run, Smith Ditch, Holcomb Ditch, Molcomb Ditch and Tudor Ditch.

Big Darby Creek is located to the west of the City and is designated as a state and national scenic river. Hilliard-specific major waterways within this watershed consist of: Hamilton Run and Clover Groff Run.

Where applicable, BMPs shall be selected to address U.S. EPA approved Total Maximum Daily Load (TMDL) recommendations for identified water quality problems associated with MS4 discharges within the City's MS4 watershed(s). TMDLs identify and evaluate water quality problems in impaired water bodies and propose solutions to bring those waters into attainment.

The Scioto River (middle) watershed TMDL report is currently being prepared by the OEPA and has not been approved by the U.S. EPA as of the date of this program preparation.

The Big Darby Creek watershed TMDL was approved by the U.S. EPA on March 31, 2006. TMDL pollutants required to be addressed per the OEPA NPDES general permit consist of total phosphorus (TP) and E. coli. Total phosphorus sources in stormwater runoff primarily result from excessive fertilizer application. E. coli sources include discharges from failing home sewage treatment systems (HSTSs), leaking or broken sanitary sewers, and pet waste exposed to stormwater.

The City shall review and evaluate the overall SWMP on an annual basis to determine if modifications are necessary in meeting the goals for each MCM. Program modifications shall be identified within the medication log located within Appendix H and summarized within the annual reports submitted to the OEPA.

MCM 1: Public Education/Outreach

Per the OEPA NPDES permit requirements, the City is required to develop and Implement a public education program to distribute educational materials to the community or conduct equivalent outreach activities about the impacts of stormwater discharges on water bodies and the steps that the public can take to reduce pollutants in stormwater runoff.

OEPA Performance Standards:

- Educational materials shall be developed and distributed in addressing a minimum of five stormwater themes or messages shall over the permit term.
- The City shall incorporate more than one outreach mechanism.
- The public education and outreach program shall reach at least 50 percent of the City's population over the permit term.
- TMDL Performance Standard: the stormwater public education and outreach program shall, at a minimum, target each TMDL pollutant identified within the small MS4.
    - Big Darby Creek TMDL pollutants: Total Phosphorus (TP) and E. coli

The City of Hilliard has chosen a mix of BMPs for public education and outreach. This control measure will target homeowners, commercial property owners, the development community, and the general public (those visiting Hilliard and non-homeowners).

Education Materials and Strategies

The City of Hilliard has a number of existing programs specifically for the dissemination of information to its citizens. The City developed an educational program to include:

1. Educational stormwater articles for publication and brochure distribution;
2. Distribution of educational material addressing stormwater impacts at local events and workshops;
3. Educational programming for Hilliard City School District teachers and students;
4. Preconstruction meeting with developers and contractors.

Reaching Diverse Audiences

The public education program uses a variety of strategies to reach a diverse audience. The City's local strategies include reaching commercial areas through brochures and publications, reaching school age children through the Hilliard City School System and Franklin County Soil and Water Conservation District (FSWCD), reaching homeowners through City publications, website, and FSWCD, and reaching the development community through the Design Manual available on the City's website. As a result of this outreach program, diverse audiences will be informed of the importance of reducing stormwater pollution, ways they can incorporate pollution reduction in their daily lives, and opportunities for individual or group involvement.

Education Themes and Target Pollutant Sources

The education materials and strategies that the City will implement over the permit period will cover a variety of themes or messages, including but not limited to the following:

1. Construction site stormwater runoff management;
2. Urban stormwater runoff pollution prevention;
3. Water quality improvement associated with household/residential activities;
4. Commercial activities, including restaurants, stormwater pollution prevention;
5. Illicit discharge detection and elimination.

The distribution of educational material addressing the abovementioned themes will assist with stormwater pollution prevention and improving water quality by targeting the following pollutant sources:

1. Sediment within construction site runoff;
2. Fertilizers (TP)/pesticides;
3. Home sewage treatment system discharges (E. coli);
4. Oils/greases;
5. Litter and other debris common within urban areas.

Minimum Control Measure Evaluation

To evaluate the success of this portion of the overall program, the City will annually review the number of people reached by the outreach efforts and review the tracking of water quality related concerns and complaints received by the City from the public. The program can be modified based upon the results of the annual review and determine if additional means of outreach are needed to target specific audiences or pollutants resulting from the concerns and complaints received.

MCM 1: Public Education/Outreach Measurable Goals

- Continue to use existing and develop new outreach mechanisms that provide stormwater pollution prevention education to the target audiences in addressing the chosen themes.
- Distribute education material to at least 50% of City's population over the permit term.
- Annually, determine the effectiveness of the stormwater education program and modify as necessary to ensure that the target audiences are being appropriately reached.

Minimum Control Measure 1: Public Education/Outreach

BMP	Description	Responsible Party	Theme/Message	Target Audience	Target Pollutant	Implementation Year
Educational Programming for Hilliard City School District Teachers and Students	Continue to implement a program to provide stormwater related education to students on topics related to stormwater pollution including water quality, soil and soil erosion in relation to Ohio State Science Standards. • EnviroScape Program • Exploring Soil Program • Lorax Program • Soil Erosion Program • Soil and Water Information for Teachers (SWIFT) Newsletters	Franklin SWCD	Urban stormwater runoff pollution prevention and soil and water conservation	Teachers and Students	• TSS • Litter, and other debris common within urban areas	2021-2026
Site Improvement Preconstruction Meetings	Meet with developers and contractors at site improvement preconstruction meetings and review Ohio EPA and City requirements associated with properly managing the stormwater runoff from the site during and post-construction to assist with illicit discharges into the City's MS4 and streams. • NPDES permit coverage • Stormwater Pollution Prevention Plan (SWP3) • Inspection requirements • SWP3 modifications • Post-construction Operation and Maintenance (O&M) plans, agreements, inspections, and reporting	City of Hilliard Engineering Division	Construction site stormwater runoff management	Development Community	• TSS • Non-sediment pollutants commonly located at construction sites	2021-2026
Newsletter	Urban Newsletter • Include educational information to developers, contractors, and SWP3 designers on the benefits to stormwater quality by incorporating green infrastructure (GI) Best Management Practices within the site improvement projects.	Franklin SWCD	Construction site stormwater runoff management	Development Community	• TMDL Pollutant: TP	2022

BMP	Description	Responsible Party	Theme/Message	Target Audience	Target Pollutant	Implementation Year
Developer, Contractor, and Consultant Education Program	Provide educational information to developers to assist with managing stormwater runoff. • Webcasts hosted by the Center for Watershed Protection • Facilitate Central Ohio Stormwater Roundtables • Urban Review newsletter distribution	Franklin SWCD	Urban stormwater runoff pollution prevention	Development Community	• TSS • Litter, and other debris common within urban areas	2021-2026
Educational Mailing	Provide and educational mailer associated with illicit discharge prevention to property owners near MS4 outfalls that will be screened during a given year. Provide mailers to all aerator owners on an annual basis with system inspection and maintenance guidelines.	Franklin SWCD & Franklin County Public Health	Illicit discharge detection and elimination	Residents	• TMDL Pollutant: E.coli	2021-2026
Educational Program	Water Quality Partnership • Provide education and outreach to local businesses on reducing stormwater runoff pollution entering streams. • Businesses have the opportunity to take a voluntary pledge, committing their business to good water quality practices.	Franklin SWCD	Commercial activities, including restaurants, stormwater pollution prevention	Commercial Property Owners	• TSS • Oils/greases • Litter, and other debris common within urban areas	2021-2026
Educational Program	Pick Up Poop (PUP) • Program encourages residents to clean up after their pets to protect waterways. Educational materials are distributed to community members at local events about the possible impacts of pet waste on clean water.	Franklin SWCD	Illicit discharge detection and elimination	Residents	• TMDL Pollutant: E.coli	2022-2026
Educational Program	Community Backyards Program • Provide conservation education material, and rebates for rain barrels, compost bins, or native plants with participation through an online course or in-person workshop.	Franklin SWCD	Water quality improvement associated with household/residential activities	Residents	• TSS • Litter, and other debris common within urban areas	2021-2026
Educational Program	Get Grassy Program • Educate residents on the beneficial impacts to waterways by implementing proper lawn care techniques.	Franklin SWCD	Water quality improvement associated with household/residential activities	Residents	• TMDL Pollutant: TP	2021-2026

BMP	Description	Responsible Party	Theme/Message	Target Audience	Target Pollutant	Implementation Year
Earth Day Festival	Provide residents of Hilliard with educational information associated with backyard conservation and stormwater quality education that residents can implement within the community.	Franklin SWCD	Backyard conservation, water quality, and urban stormwater runoff pollution prevention	Residents	• TSS • Litter, and other debris common within urban areas	2021-2026
Brochure	Brochure titled: "Stormwater Pollution Prevention" • Brochures are available at the municipal building	City of Hilliard	Urban stormwater runoff pollution prevention	Residents	• TSS • Litter, and other debris common within urban areas	2021-2026
Educational Articles	Explore the use of social media platforms and utility bill mailings to provide educational materials related to the City's SWMP themes and advertise public participation opportunities within the City.	City of Hilliard	Urban stormwater runoff pollution prevention	Residents	• TSS	2022-2026

MCM 2: Public Participation/Involvement

Per the OEPA NPDES permit requirements, the City is required to develop and implement a program associated with creating opportunities for public participation. The City is to identify the target audiences and target pollutants to be addressed with the program implementation.

OEPA Performance Standards:

- Involve the public with the SWMP updates.
- Five public involvement activities over the permit term.
- TMDL Performance Standard: the stormwater public participation/involvement program shall, at a minimum, target each TMDL pollutant identified within the small MS4.
    - Big Darby Creek TMDL pollutants: Total Phosphorus (TP) and E. coli

The City of Hilliard recognizes that a successful stormwater program relies not only on the MS4 owners and operators and the regulatory community, but also upon the input, assistance and understanding of the general public. The City's program includes means and methods to give the public opportunity to play an active role in both the development and implementation of the NPDES Phase II program.

The City's public involvement/participation programming must include at least five (5) public involvement activities over the permit term (one per permit year). The permit requires documentation of the number of people participating in events.

Strategies

The program for the City of Hilliard is predicated largely on increasing awareness of how the City's MS4 functions through passive information dissemination. Since awareness has been raised, the program will be enhanced to include more active public participation. Given that, the City will reinforce existing methods for receiving information from the public and identify opportunities for civic groups to participate in the process. The City will continue to participate in an established public involvement event on an annual basis, in coordination with FSWCD. The public events will be chosen to address the stormwater themes as identified within the Public Education/Outreach Minimum Control Measure.

As stated earlier, the target audience for the program can be divided into three general categories: residential, commercial and general public. The commercial properties include small, medium and large properties, as well as type (restaurant and retail, for example).

Minimum Control Measure Evaluation

To evaluate the success of this portion of the overall program, the City will annually review the number of people that participate in the public events and review the tracking of water quality related concerns and complaints received by the City from the public. The program can be modified based upon the results of the annual review and determine if additional public events are needed to target specific audiences or stormwater themes.

MCM 2: Public Participation/Involvement Measurable Goals

- Provide at least five public involvement activities over the permit term in addressing the target audience and stormwater themes as identified within the Public Education/Outreach Minimum Control Measure.
- Annually, determine the effectiveness of the stormwater public participation/involvement program and modify as necessary to ensure that the target audiences are being appropriately reached.

Minimum Control Measure 2: Public Participation/Involvement

BMP	Description	Responsible Party	Target Audience	Target Pollutant	Implementation Year
SWMP Updates – Public Involvement	Present updates at public meeting • The City will review the SWMP that was prepared under the previous OEPA permit coverage term and update the plan to meet the current OEPA permit requirements and incorporate feedback received from the public.	City of Hilliard	General Public	• Sediment within construction site runoff • Fertilizers/pesticides • Home sewage treatment system discharges • Oils/greases • Litter and other debris common within urban areas	2021-2022
Public Reporting	Hilliard 311 Hilliard 311 aids the City in addressing the needs of its citizens. The service is capable of receiving a request for service, including stormwater quality concerns, tracking work associated with a service request, and notifying citizens when a service request has been completed.	City of Hilliard	General Public	• Sediment within construction site runoff • Home sewage treatment system discharges • Oils/greases • Litter and other debris common within urban areas	2021-2026
Public Event	Community Cleanup • Organize cleanup events within the community and seek public participation to assist with the removal of pollutants that could impair water quality.	City of Hilliard	Residents & Commercial	• Litter and other debris common within urban areas	2022-2026
Workshop	Community Backyards Program • Provide conservation education material, and rebates for rain barrels, compost bins, or native plants with participation through an online course or in-person workshop.	Franklin SWCD	Residential	• TSS	2021-2026
Public Program	Pick Up Poop (PUP) • Program encourages residents to clean up after their pets to protect waterways. Educational materials are distributed to community members at local events about the possible impacts of pet waste on clean water.	Franklin SWCD	Residential & General Public	• TMDL Pollutant: E.coli	2022-2026

BMP	Description	Responsible Party	Target Audience	Target Pollutant	Implementation Year
Public Program	Get Grassy Program • Educate residents on the beneficial impacts to waterways by implementing proper lawn care techniques.	Franklin SWCD	Residential	• TMDL Pollutant: TP	2021-2026
Public Program	Water Quality Partnership • Provide education and outreach to local businesses on reducing stormwater runoff pollution entering streams. • Businesses have the opportunity to take a voluntary pledge, committing their business to good water quality practices.	Franklin SWCD	Commercial Property Owners	• TSS • Oils/greases • Litter, and other debris common within urban areas	2021-2026
Public Program	Continue to implement a program to provide stormwater related education to students on topics related to stormwater pollution including water quality, soil and soil erosion in relation to Ohio State Science Standards. • EnviroScape Program • Exploring Soil Program • Lorax Program • Soil Erosion Program • Soil and Water Information for Teachers (SWIFT) Newsletters	Franklin SWCD	Teachers and Students	• TSS • Litter, and other debris common within urban areas	2021-2026

MCM 3: Illicit Discharge Detection and Elimination (IDDE)

Per the OEPA NPDES permit requirements, the City is required to develop, implement and enforce a program to detect and eliminate illicit discharges into the MS4.

OEPA Performance Standards:

- Develop and maintain a MS4 map.
- Adopt and enforce and illicit discharge prevention regulation.
- Develop and implement an IDDE plan.
- Maintain a list of home sewage treatment systems (HSTSs) connected or discharging into the MS4.
- Implement an MS4 outfall dry-weather screening program to assist with eliminating illicit discharges.
- Notify OPEA of detected illicit discharges associated with sanitary cross connections and leaking/broken sanitary lines.
- TMDL Performance Standard: provide an annual employee training including IDDE procedures.

The City of Hilliard has minimized the potential for illicit discharges to the stormwater system through development of an ordinance and abatement program. The water quality assessment of creeks and waterways within the City has been completed by FSWCD under the previous OEPA permit term.

The City has initiated an education program to increase public awareness of the stormwater system and illicit discharge control. The City will continue to make available an illicit discharge detection and elimination brochure at City office. As the public education and outreach program results in greater awareness of the system, local citizens may become involved using the website to report illicit discharge locations.

Strategies

The City has completed a geographic information system (GIS) map for the urbanized area, including the incorporation of stormwater system information and automated maintenance (service) tracking program. The City will continue to maintain GIS updates to their map and the City's public reporting system (Hilliard 311).

The City coordinates with the Franklin County Board of Health to identify on-site treatment systems (HSTS) within the incorporated City limits. This information will be added to the GIS product during the course of the permit term.

The City will continue to coordinate with FSWCD to conduct dry weather screening of necessary outfalls over the permit term. As part of the dry weather screening, samples will be collected where there are signs of illicit discharge (visual or odor) and in such cases, potential sources identified. In previous stream assessments conducted by FSWCD within the City of Hilliard, potential areas where failed HSTS may be resulting in pockets of pollution were discovered and will be investigated.

The control of illicit discharges is part of the City Code 949.02. This section requires that with certain exceptions, only discharge composed entirely of stormwater is permitted in the storm sewers. A copy of the City's IDDE plan is provided within Appendix B. The City will notify the OPEA of detected illicit discharges associated with sanitary cross connections and leaking/broken sanitary lines. A copy of the OEPA notification form is provided within Appendix C. The City will annually train employees on IDDE procedures including documentation and reporting.

Minimum Control Measure Evaluation

To evaluate the success of this portion of the overall program, the City will review water quality concerns as reported on the City's maintained Service Request Center and the results of the stormwater outfall dry weather screenings and compare the results to the screenings conducted under the previous SWMP. The program can be modified based upon the results of the review and determine if additional public education mechanisms are needed to target specific audiences or stormwater pollutants.

MCM 3: Illicit Discharge Detection and Elimination Measurable Goals

- Develop and implement an Illicit Discharge Detection and Elimination (IDDE) plan.
- Conduct stormwater outfall dry weather screenings and address noted illicit discharges per the prepared IDDE plan.
- Continue to provide means for the public to contact the City to report illicit discharge concerns and investigate and address the concerns per the IDDE plan.

Minimum Control Measure 3: Illicit Discharge Detection and Elimination

BMP	Description	Responsible Party	Implementation Year
Ordinance/Regulation	City Code 949.02: Use of Public Sewers Required • Regulation prevents illicit discharges into the MS4 and addresses illegal dumping. • The City Code provides enforcement capabilities if an illicit discharge into the MS4 is identified. https://library.municode.com/oh/hilliard/codes/code_of_ordinances?nodeId=PTNINESTUTPUSECO_TITTHREEUT_CH949SERECH_SESERE_949.02USPUSERE	City of Hilliard	2021-2026
MS4 Map	The City will continue to maintain the GIS based MS4 map on an annual basis to ensure the required OEPA mapping components are properly identified and MS4 improvements are added resulting from constructed site improvement projects and field verification. An up-to-date map will assist the City with tracing sources of noted illicit discharges into the MS4 system and investigate surface water outfall locations. The MS4 map consists of the following components: • Storm pipes • Catch basins • Ditches • Retention/Detention basins • Public/Private water quality Best Management Practices • Stormwater outfall locations • Surface water locations and names	City of Hilliard & Franklin SWCD	2021-2026
MS4 Map Updates	The City will update the MS4 map to identify and label the post-construction water quality Best Management Practice types.	City of Hilliard & Franklin SWCD	2022-2026
IDDE Plan	The City's IDDE plan was updated by Franklin SWCD in 2017. The IDDE plan outlines the City's overall program associated with the prevention and addressing illicit discharges into the MS4. The IDDE plan will be reviewed and updated to incorporate illicit discharge reporting and response procedures. The updated plan will be reviewed with City staff as part of an annual IDDE training. A copy of the IDDE plan is located within Appendix B.	City of Hilliard & Franklin SWCD	2022
Home Sewage Treatment System (HSTS) Mapping and List	The City will continue to work with Franklin County Public Health with the identification of failing home sewage treatment systems. A HSTS map will continue to be maintained identifying the parcels with HSTS's that drain to the MS4. These HSTS outfalls will be inspected for illicit discharges as part of the City's overall MS4 outfall dry-weather screening program. Franklin SWCD and Franklin County Public Health provides educational materials to property owners with HSTS's to assist with proper inspection and maintenance guidance. Proper maintenance shall assist with preventing illicit discharges into the City's MS4.	City of Hilliard and Franklin County Public Health	2021-2026
Public Reporting	Hilliard 311 Hilliard 311 aids the City in addressing the needs of its citizens. The service is capable of receiving a request for service, including stormwater quality concerns, tracking work associated with a service request, and notifying citizens when a service request has been completed.	City of Hilliard	2021-2026

BMP	Description	Responsible Party	Implementation Year
MS4 Outfall Dry-Weather Screening	Franklin SWCD has screened the MS4 outfalls under previous permits. FSWCD will continue to conduct screenings on an annual bases. • Conduct dry-weather screening of necessary outfalls and investigate areas of potential HSTS failure over 1/3 of the MS4 outfalls per year plus follow-up to previous year screenings where potential illicit discharges were noted. An annual report will be prepared and submitted to the City summarizing the screening findings. • Noted illicit discharges will be reported to the City through Hilliard 311 and Franklin County Public Health will be notified if HSTS related. • The City will determine the source of the illicit discharges and notify the responsible parties and required elimination actions per the IDDE plan.	Franklin County SWCD	2021-2026
Illicit Discharge OEPA Notification	The City shall notify Ohio EPA if any of the following Illicit discharges are detected discharging to the MS4: • Illicit sanitary cross connections from industrial, commercial or multi-family sources • Leaking or broken sanitary sewer lines that are actively contributing sewage to the MS4 Notification shall include the location, general description, date, and approximate time the illicit discharge was discovered. Such notification shall be made to the appropriate Ohio EPA district office within twenty-four (24) hours of discovery of the source: A copy of the Oho EPA notification form is provided within Appendix C.	City of Hilliard	2021-2026
Training	In meeting the Ohio EPA TMDL E.coli performance standard, the City will provide annual training to City service staff associated with illicit discharge detection and elimination, including the review of the IDDE plan procedures and Ohio EPA notification requirements.	City of Hilliard	2022-2026

MCM 4: Construction Site Stormwater Runoff Control

Per the OEPA NPDES permit requirements, the City is required to develop, implement, and enforce a program to reduce pollutants in stormwater runoff to the small MS4 from construction activities that result in a land disturbance of greater than or equal to one acre.

OEPA Performance Standards:

- Adopt and enforce a regulation to require site operators to implement appropriate erosion and sediment controls along with requirements to control waste such as, but not limited to, discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that may cause potential water quality impacts.
- Require developers to prepare and submit Storm Water Pollution Prevention Plans (SWP3's) to the City for review and approval.
- Establish procedures for receipt and consideration of information submitted by the public
- Conduct erosion and sediment control inspections on a minimum monthly bases and establish enforcement procedures.
- TMDL Performance Standard: non-compliance issues, inspect site once every 14 days until compliance is achieved.
    - Construction activities have started at the site with no SWP3 reviewed and approved by the MS4;
    - Failure to install sediment basin(s) when the SWP3 and/or site drainage clearly indicate as a first step (within 7 days prior to grading and within 7 days of grubbing);
    - Construction activities taking place with no sediment/erosion controls; or
    - Dewatering activities resulting in turbid discharges.

The City of Hilliard recognizes that sediment laden runoff from construction sites, if unchecked, can deposit more sediment and pollutants in a stream than would be deposited there over the course of decades from other land use types. The resulting siltation, and other pollutants, can cause physical, chemical, and biological harm to the waterways.

Strategies

The City relies on a two-fold approach to construction site runoff control. First, the City reviews the SWP3's for all submitted construction drawings within the City per the Hilliard Engineering Design Manual, Chapter 1.4.4.B.12: Erosion and Sediment Control Plan and Details Sheets and Chapter 8: Soil Erosion and Sedimentation Control. These sections of the design manual requires developers to prepare a SWP3 in accordance with the OEPA General Permits associated with construction site stormwater runoff. The SWP3 is required to be submitted to the City and construction can't commence until the plan has been approved. The City reviews the submitted SWP3's and completes a checklist to ensure consistent reviews. The plan review checklists also identifies items that are required to be addressed by the plan designer. A copy of the SWP3 review checklist is provided within Appendix D.

Second, The City conducts erosion and sediment control inspections to ensure that the approved SWP3 is being properly implemented. Inspection reports are prepared and submitted to the project contact. A copy of the City's inspection report is provided within Appendix E and shall be completed for each inspection. Resulting from the inspection results, the City has enforcement procedures established if necessary as indicated within the City's Construction Program Escalation Plan provided within Appendix F. The City's Hilliard 311 may be used by residents for reporting any issues observed during construction.

Minimum Control Measure Evaluation

To evaluate the success of this portion of the overall program, the City will track the number of SWP3s reviewed and site inspections conducted. The program can be modified based upon the results of the weekly inspections and determine if additional education mechanisms or enforcement procedures are needed in addressing construction site stormwater runoff.

MCM 4: Construction Site Stormwater Runoff Control Measurable Goals

- Review SWP3s that are submitted to the City to ensure compliance with the Hilliard Engineering Design Manual and the OEPA's General Permits associated with construction site discharges.
- Review construction site stormwater management requirements with developers and contractors at preconstruction meetings to ensure they understand their roles and responsibilities during the construction of the site improvements.
- Inspect all active construction projects within the City on a minimum monthly basis.
- Continue to provide means for the public to contact the City to report construction site runoff concerns and investigate and address the concerns.

Minimum Control Measure 4: Construction Site Stormwater Runoff Control

BMP	Description	Responsible Party	Implementation Year
Ordinance/Regulation	The City has established a Design Manual requiring developers to prepare SWP3's and obtain Ohio EPA NPDES permit coverage for applicable projects. The manual was adopted per City Code Chapter 1190.01: Design Standards. https://library.municode.com/oh/hilliard/codes/code_of_ordinances?nodeId=PTELEVENPLZOCO_CH1190DEST_1190.01DEST	City of Hilliard	2021-2026
Design Manual	The City's Design Manual is posted on the City's maintained website: https://hilliardohio.gov/wp-content/uploads/2018/10/designmanual.pdf • Chapter 1: General - requires SWP3 to be prepared per the minimum Ohio EPA NPDES permit standards and requires submittal to the City for review and approval. • Chapter 8 : Soil Erosion and Sedimentation Control – requires developers to obtain Ohio EPA NPDES permit coverage and indicates that erosion and sediment controls are to be designed per the speciation's within the Rainwater and Land Development manual.	City of Hilliard	2021-2026
Design Manual Updates	The City will update the Design Manual to meet minimum requirements of the current OEPA NPDES general permit associated with construction site stormwater runoff management.	City of Hilliard	2022
SWP3 Review	The City requires the preparation and submittal of SWP3s for site improvement projects that will result in land disturbing activities of 1 acre or more or are small but part of an overall larger common area of development that will result in the disturbance of 1 or more acres. • Review SWP3s that are submitted to the City to ensure compliance with the Hilliard Engineering Design Manual, Chapter 8: Soil Erosion and Sedimentation Control and the OEPA's General Permits.	City of Hilliard & City Contracted Consultants	2021-2026
SWP3 Review Checklist	The City will develop a SWP3 checklist that will coincide with Ohio EPA's SWP3 review checklist. A checklist will be prepared during each SWP3 review and kept on file. The checklist will be provided to the consultant preparing the plan and identify items that will need to be properly addressed prior to the City approving the plan. A copy of the SWP3 review checklist is provided within Appendix D.	City of Hilliard	2022
SWP3 Template	The City will develop a SWP3 template to coincide with the SWP3 checklist. The template will be posted on the City's website for consultants to use when preparing SWP3's that are required to be submitted to the City for review and approval.	City of Hilliard	2022
General Notes Updates	The City will update standard notes that are to be included within the SWP3 to coincide with OEPA SWP3 review checklist.	City of Hilliard	2022
Site Improvement Preconstruction Meeting	Meet with developers and contractors at site improvement preconstruction meetings and review Ohio EPA and City requirements associated with properly managing the stormwater runoff from the site during and post-construction to assist with illicit discharges into the City's MS4 and streams. • NPDES permit coverage • SWP3 overview • Inspection requirements • SWP3 modifications	City of Hilliard	2021-2026

BMP	Description	Responsible Party	Implementation Year
Construction Sediment and Erosion Control Inspection (CSECI) Program	The City conducts biweekly erosion and sediment control site inspections for all active public and private projects where the City has reviewed and approved SWP3's. Inspection reports are prepared summarizing the inspection findings and identifies required action items the developer/contractor need to address in meeting the City's and Ohio EPA's stormwater management requirements.	City of Hilliard & City Contracted Consultants	2021-2026
CSECI Report Template Updates	The City will review the current CSECI reporting form and update to ensure the minimum Ohio EPA NPDES general permit requirements are being properly addressed by the developer/contractor during construction of the City approved projects. A copy of the CSECI inspection checklist is provided within Appendix E.	City of Hilliard	2022
Enforcement	The City has enforcement capabilities per City Code Chapter 951: Stormwater Management to address violations resulting from City conducted erosion and sediment control inspections. https://library.municode.com/oh/hilliard/codes/code_of_ordinances?nodeId=PTNINESTUTPUSECO_TITTHREEUT_CH951STMACO The City will prepare a Construction Program Escalation Plan consisting of the following components to assist with the enforcement of the City's overall CSECI program: • Inspection and reporting frequency • Notice of Violation notification procedures • Enforcement procedures A copy of the Construction Inspection Program Escalation Plan is provided within Appendix F.	City of Hilliard	2022
Public Reporting	Hilliard 311 Hilliard 311 aids the City in addressing the needs of its citizens. The service is capable of receiving a request for service, including stormwater quality concerns, tracking work associated with a service request, and notifying citizens when a service request has been completed.	City of Hilliard	2021-2026

MCM 5: Post-Construction Stormwater Management in New Development/Redevelopment

Per the OEPA NPDES permit requirements, the City is required to develop, implement, and enforce a program to address stormwater runoff from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale, that discharge into the MS4.

OEPA Performance Standards:

- Review and update the City's post-construction stormwater management regulations, if necessary, to meet the Ohio EPA's current NPDES general permit requirements.
- Complete checklists when reviewing SWP3's and conducting erosion and sediment control and post-construction BMP inspections.
- Develop a BMP as-built program to ensure the BMP's are constructed per the City approved SWP3's.
- Establish O&M agreements with post-construction operators to ensure BMP's will be properly inspected and maintained per the City's approved O&M plans.
- Develop a plan to assist with the enforcement of the City's post-construction stormwater management regulations.
- TMDL Performance Standard:
    - Provide an educational opportunity to contractors, SWP3 designers, and/or employees on OHC000005 Table 4b practices and/or other green infrastructure practices during the permit term.
    - Include at least one of the following:
        - Retrofit one (1) existing stormwater practice that solely provides peak-discharge function to meet the performance standard for an extended detention post-construction practice in accordance with NPDES General Permit OHC000005 Table 4a or 4b.
        - Perform restoration of at least three hundred linear feet of channelized stream where natural channel stability and floodplain restoration will reduce stream erosion.
        - Update the City's ordinance or other regulatory mechanism to require OHC000005 Table 4b practices and/or other green infrastructure practices <u>where feasible</u>.
        - Install one (1) or more NDPES General Permit OHC000005 Table 4b practices to treat a minimum of 1acre of existing impervious area developed prior to 2003.

The City of Hilliard has developed a stormwater management program incorporating both structural and non-structural post-construction water quality BMPs. Areas within the Big Darby Creek Watershed shall meet the requirements of the OEPA General Permit for Stormwater Discharges Associated with Construction Activity within the Big Darby Creek Watershed. Post-construction stormwater management in all areas shall meet the requirements specified in the

OEPA Construction General Permit and the City of Hilliard Engineering Design Manual. The Hilliard Engineering Design Manual contains complete stormwater management and design requirements. The manual provides guidance on the most effective structural and non-structural BMPs for development sites, which will help protect the City's MS4 and waterways from adverse impacts of stormwater runoff.

Strategies

The City of Hilliard reviews the Stormwater Pollution Prevention Plans (SWP3s) for all submitted construction drawings within the City per the Hilliard Engineering Design Manual, Chapter 7: Stormwater Design. The manual requires developers to prepare a SWP3 in accordance with the OEPA General Permits associated with construction site stormwater runoff. The SWP3 includes the location and design of the post-construction water quality BMP that is to be installed per the proposed site improvements and the delineation of protected stream corridor protection zones for applicable sites. A copy of the SWP3 review checklist is provided within Appendix D. The Hilliard Engineering Design Manual additionally requires the developer to prepare and submit to the City for review and approval an Operation & Maintenance (O&M) plan. The plan identifies the post-construction operator and inspection and maintenance procedures. The post-construction operator is additionally required to enter into an agreement with the City that the BMP will be properly inspected and maintained. The City additionally provides inspection services to ensure that the City approved BMP's are properly constructed and maintained per the City approved plans and established agreements. Resulting from the inspection results, the City has enforcement procedures established if necessary as indicated within the City's Post-Construction Program Escalation Plan provided within Appendix G.

Minimum Control Measure Evaluation

To evaluate the success of this portion of the overall program, the City will track the number of SWP3s and O&M plans reviewed, Inspection and Maintenance agreements established and the number of annual BMP inspections conducted. The program can be modified if it is determined the plans are not being properly prepared and the required inspections conducted. Additional education to the development community may be necessary based upon the results of the program evaluation.

MCM 5: Post-Construction Stormwater Management Measurable Goals

- Review SWP3s and Operation and Maintenance plans that are submitted to the City to ensure compliance with the Hilliard Engineering Design Manual and the OEPA's General Permit associated with construction site discharges.
- Review post-construction site stormwater management requirements with developers at preconstruction meetings to ensure they understand their roles and responsibilities associated with the inspection and maintenance of the water quality BMP.
- Ensure that the post-construction water quality BMPs are being properly inspected and maintained per the established agreement between the post-construction operator and the City of Hilliard.

Minimum Control Measure 5: Post-Construction Stormwater Management in New Development/Redevelopment

BMP	Description	Responsible Party	Implementation Year
Ordinance/Regulation	The City has established a Design Manual requiring developers to prepare SWP3's and obtain Ohio EPA NPDES permit coverage for applicable projects. The manual was adopted per City Code Chapter 1190.01: Design Standards. https://library.municode.com/oh/hilliard/codes/code_of_ordinances?nodeId=PTELEVENPLZOCO_CH1190DEST_1190.01DEST	City of Hilliard	2021-2026
Design Manual	The City's Design Manual is posted on the City's maintained website: https://hilliardohio.gov/wp-content/uploads/2018/10/designmanual.pdf • Chapter 1: General - requires SWP3 to be prepared per the minimum Ohio EPA NPDES permit standards and requires submittal to the City for review and approval. • Chapter 7: SCPZ, qualitative control per OEPA NPDES permit, O&M plans and agreements	City of Hilliard	2021-2026
Design Manual Updates	The City will update to meet minimum requirements of the current OEPA NPDES general permit associated with construction site stormwater runoff management.	City of Hilliard	2022
SWP3 Review	The City requires the preparation and submittal of SWP3s for site improvement projects that will result in land disturbing activities of 1 acre or more or are small but part of an overall larger common area of development that will result in the disturbance of 1 or more acres. • Review SWP3s that are submitted to the City to ensure compliance with the Hilliard Engineering Design Manual, Chapter 7: Stormwater Design and the OEPA's General Permits. • Ensure that post-construction water quality BMPs are properly designed. • Ensure that Stream Corridor Protection Zones (SCPZs) are properly delineated on the SWP3 where applicable.	City of Hilliard & City Contracted Consultants	2021-2026
SWP3 Review Checklist	The City will develop a SWP3 checklist that will coincide with Ohio EPA's SWP3 review checklist. A checklist will be prepared during each SWP3 review and kept on file. The checklist will be provided to the consultant preparing the plan and identify items that will need to be properly addressed prior to the City approving the plan. A copy of the SWP3 review checklist is provided within Appendix D.	City of Hilliard	2022
O&M Plan	The City will requires preparation and submittal of O&M plans for site improvement projects that will result in land disturbing activities of 1 acre or more. • O&M plans are reviewed by the City to ensure compliance with the Hilliard Engineering Design Manual, Chapter 7: Stormwater Design and the OEPA's General Permits. • The O&M template is provided on the City's website https://hilliardohio.gov/wp-content/uploads/2021/10/BMP-OM-Plan-and-AgreementTemplates.pdf	City of Hilliard	2021-2026
O&M Plan Template Updates	The City will review and update the current O&M Plan template and post on the City's website for reference and access.	City of Hilliard	2022
Inspection and Maintenance (I&M) Agreement	The City will ensure that an I&M Agreement shall be made between the Owner and the City of Hilliard ensuring that the BMP(s) shall be properly inspected and maintained and shall be included within the Operation and Maintenance Plan. • The I&M Agreement template is included within the O&M template and is provided on the City's website https://hilliardohio.gov/wp-content/uploads/2021/10/BMP-OM-Plan-and-AgreementTemplates.pdf	City of Hilliard	2021-2026

BMP	Description	Responsible Party	Implementation Year
I&M Agreement Update	The City will review and update the current I&M Agreement template and post on the City's website for reference and access.	City of Hilliard	2022
General Notes Updates	The City will update standard notes that are to be included within the SWP3 to coincide with OEPA SWP3 review checklist.	City of Hilliard	2022
Stream Corridor Protection Zone (SCPZ)	City Design Manual Chapter 7.1.3 Stream Corridor Protection Zone • The City enforces SCPZ requirements for projects within the Big Darby Creek watershed per the requirements outlined within the Ohio EPA's NPDES general permit. • The City has additionally adopted SCPZ requirements for locations outside of the Big Darby Creek watershed.	City of Hilliard	
BMP As-builts	The City will develop a BMP as-built process and establish submittal requirements to assist with ensuring that the BMP's are properly constructed per the City's approved SWP3's.	City of Hilliard	2022
Developer Education	Urban Newsletter • In meeting the TP TMDL Performance Standard, educational information to developers, contractors, and SWP3 designers on the benefits to stormwater quality by incorporating green infrastructure (GI) Best Management Practices within the site improvement projects will be provided.	Franklin SWCD	2022
Site Improvement Preconstruction Meeting	Meet with developers and contractors at site improvement preconstruction meetings and review Ohio EPA and City requirements associated with properly managing the stormwater runoff from the site during and post-construction to assist with illicit discharges into the City's MS4 and streams. • NPDES permit coverage • SWP3 overview – construction of post-construction BMP • O&M plan overview • O&M agreement – inspection and reporting requirements	City of Hilliard	2021-2026
BMP Inspections	The City will inspect all privately maintained BMP's where the City has approved an O&M plan over the permit term. The City will prepare inspection reports summarizing the inspection findings and note required maintenance action items. The reports will be submitted to the post-construction operator and include a timeframe when the maintenance needs are required to be addressed.	City of Hilliard & City Contracted Consultants	2022-2026
Enforcement	The City has enforcement capabilities per City Code Chapter 951: Stormwater Management to address violations resulting from City conducted erosion and sediment control inspections. https://library.municode.com/oh/hilliard/codes/code_of_ordinances?nodeId=PTNINESTUTPUSECO_TITTHREEUT_CH951STMACO The City will prepare a Post-Construction Program Escalation Plan consisting of the following components to assist with the enforcement of the City's overall SWMP: • Inspection and reporting frequency • Notice of Violation notification procedures • Enforcement procedures A copy of the Post-Construction Inspection Program Escalation Plan is provided within Appendix G.	City of Hilliard	2022

BMP	Description	Responsible Party	Implementation Year
TMDL Performance Standard	In meeting the Ohio EPA TMDL TP performance standard, the City will evaluate the following options and incorporate one of these requirements over the permit coverage term: ▪ Retrofit one (1) existing stormwater practice that solely provides peak-discharge function to meet the performance standard for an extended detention post-construction practice in accordance with OHC000005 Table 4a or 4b. ▪ Perform restoration of at least three hundred linear feet of channelized stream where natural channel stability and floodplain restoration will reduce stream erosion. ▪ Install one (1) or more OHC000005 Table 4b practices to treat a minimum of 1acre of existing impervious area developed prior to 2003.	City of Hilliard	2023-2026

MCM: 6 Pollution Prevention/Good Housekeeping for Municipal Operations

Per the OEPA NPDES permit requirements, the City is required to develop and implement an MS4 Operation & Maintenance (O&M) program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations.

OEPA Performance Standards:

- Provide an annual employee training.
- Record keeping of potential pollutants distributed and removed within the community.
- Salt piles are to be covered in a manner so not exposed to precipitation and stormwater runoff.
- Secondary containment or bollard/barrier protection is to be installed around above ground brine or other alternative deicer storage tanks.
- Disturbed areas resulting from ditch maintenance activities are to be stabilized per the OEPA soil stabilization requirements outlined within the construction stormwater management NPDES general permit.
- TMDL Performance Standard: at least one of the following requirements is to be incorporated within the O&M program.
    - Street sweeping program - at a minimum, sweeping shall occur on curbed streets two times per year.
    - Develop and implement a catch basin cleaning program with proper debris management and disposal. At a minimum, catch basins shall be scheduled to be cleaned once every five years.
    - Develop and implement a leaf/yard waste collection program.
    - For small MS4 facilities that do not require NPDES industrial stormwater general permit coverage but require a SWP3 in accordance with the OEPA Small MS4 NPDES General Permit, conduct routine facility inspections for these facilities at least quarterly.

Strategies

The City of Hilliard City has a variety of procedures in place to provide 'good housekeeping'. These procedures include the following:

- The proper disposal of waste oils and greases used in the City's maintenance facilities;
- The careful use of salt during snow removal periods using measures appropriate to conditions;
- The enclosed storage of all City salt stockpile;
- Very limited pesticide/herbicide use on City-owned property; and
- Removal of pollutants from City maintained streets.

The City will continue to conduct inspections at their maintenance facility to determine if the BMPs are being properly implemented per the prepared SWP3.

The City will continue to take advantage of any training opportunities presented by state or local agencies whenever possible associated with municipal activities and operations water quality improvements. Performance standards under the permit require, at a minimum, one annual employee training.

Minimum Control Measure Evaluation

To evaluate the success of this portion of the overall program, the City will annually review the tracking of pollutants applied, collected and properly disposed of as part of the City's routine municipal activities. Tacking results will be evaluated to determine if pollutant source applications can be reduced or additional pollutants removed prior to mixing with stormwater and flowing into the MS4. The City will additionally track training events attended the inspections conducted at the City maintenance facility. Inspection results will be reviewed a determination made if BMPs are in need of maintenance or additional BMPs implemented to improve water quality.

Pollution Prevention Measurable Goals

- Develop and implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations.

Minimum Control Measure 6: Pollution Prevention/Good Housekeeping for Municipal Operations

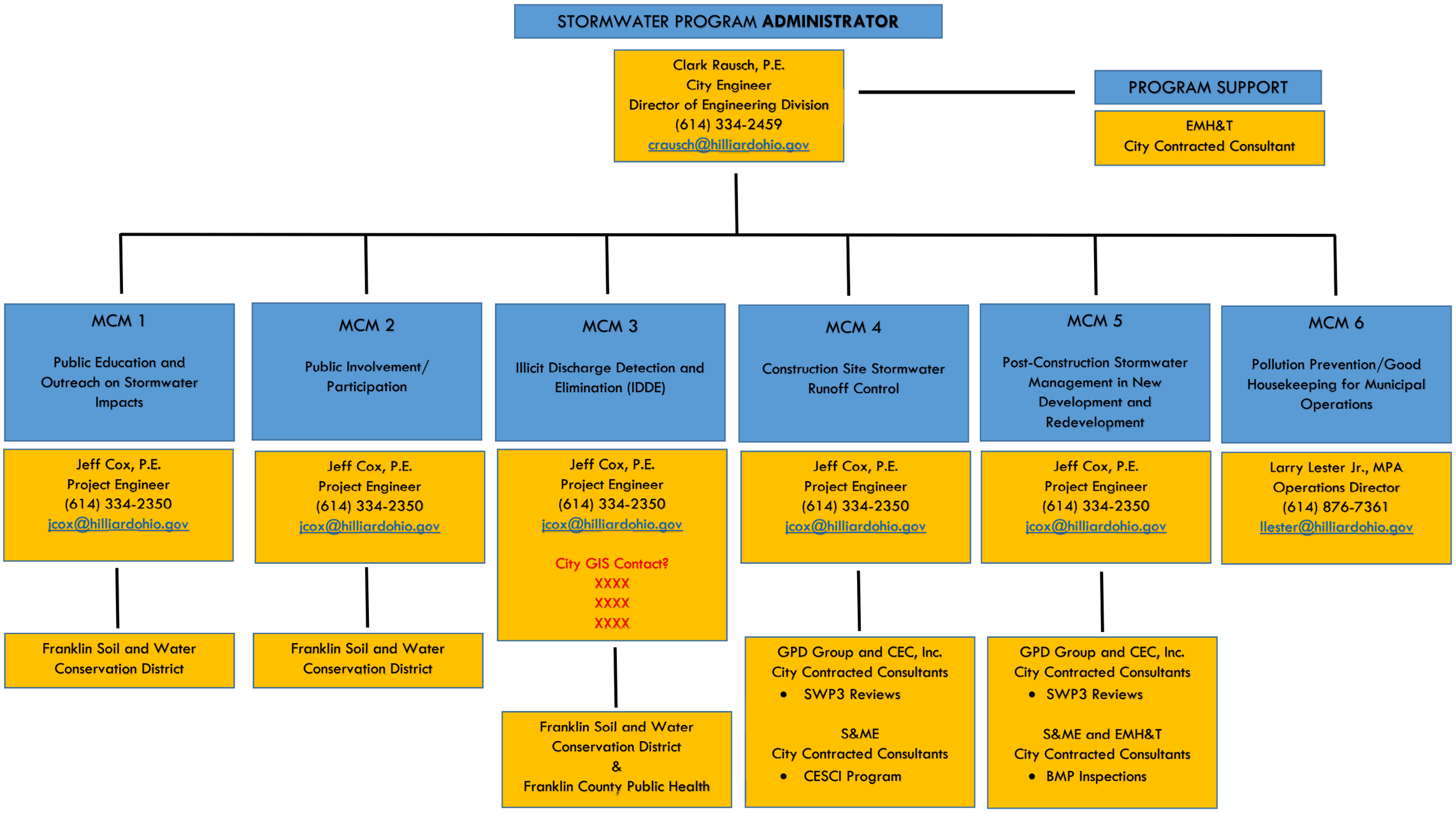
BMP	Description	Responsible Party	Implementation Year
City Staff Training	Provide an annual training to City service staff to review Best Management Practices that can be incorporated within their daily activities to assist with stormwater pollution prevention. • Maintenance facility SWP3 review • Spill response, containment, report • MS4 maintenance activities • Ohio EPA annual report tracking • IDDE reporting procedures	City of Hilliard	2021-2026
Maintenance Facility SWP3	A SWP3 has been prepared for the City maintenance facility. City staff shall annually review the plan and modify if necessary to account for new BMP's that are necessary to be implemented with prohibiting illicit discharges into the MS4. • BMP maintenance activities • Facility inspections • Staff training	City of Hilliard	2021-2026
Maintenance Facility Inspections	TMDL Performance Standard: TP and E. coli • Facility inspections shall be conducted on a quarterly basis to ensure that the SWP3 prepared for the facility is being properly implemented and to determine if SWP3 updates are required to address new pollutant sources and BMP's.	City of Hilliard	2021-2026
MS4 Maintenance – Street Sweeping	TMDL Performance Standard: TP and E. coli • Street sweeping shall occur on curbed streets two times per year. Collected pollutants shall be properly disposed of at a NPDES permitted facility.	City of Hilliard	2021-2026
MS4 Maintenance – Catch Basin Cleaning and Storm Sewer Lift Stations	TMDL Performance Standard: TP and E. coli • Storm sewer catch basins shall be inspected and collected pollutants removed from the MS4. All catch basins shall be scheduled to be cleaned at least once every five years. Collected pollutants shall be properly disposed of at a NPDES permitted facility.	City of Hilliard	2021-2026
MS4 Maintenance – City Maintained Stormwater Management Basins	City maintained stormwater management basins are analyzed to determine if sediment is required to be removed. The City has developed procedures for the removal of the accumulated sediment and proper disposal.	City of Hilliard	2021-2026
MS4 Maintenance – Ditch Maintenance	For areas of soil disturbance associated with ditch/MS4 maintenance, soil stabilization shall, at a minimum, be initiated in accordance with the time frames identified within the Ohio EPA NPDES general permit associated with construction site runoff management.	City of Hilliard	2021-2026
Disposal of Wastes	TMDL Performance Standard: TP and E. coli • The City has established a program for the proper collection, disposal, and tracking of solid waste, recyclables, and yard waste. Collected pollutants shall be properly disposed of at a NPDES permitted facility.	City of Hilliard	2021-2026

BMP	Description	Responsible Party	Implementation Year
Road Salt & Alternative Deicers	The City monitors weather and road surface conditions to determine the appropriate salt and brine application rates in order to minimize usage. Salt is stored within the covered building to minimize exposure to rain and run-on. Brine tanks are protected with barriers to prevent accidental ruptures from equipment and vehicles.	City of Hilliard	2021-2026
Pesticide & Herbicide	Pesticides and herbicides are applied in designated targeted areas by certified contractors based upon the manufacturer recommended application rates. Weather conditions are monitored prior to applications to minimize runoff into storm sewer systems and surface waters. Pesticides and herbicides are stored within a manner not to be exposed to rain or run-on.	City of Hilliard	2021-2026
Fertilizer	Fertilizers are applied in designated targeted areas based upon the manufacturer recommended application rates. Weather conditions are monitored prior to applications to minimize runoff into storm sewer systems and surface waters. Fertilizes are stored within a manner not to be exposed to rain or run-on.	City of Hilliard	2021-2026
Flood Management Projects	The City will assess new flood management projects for impacts on water quality for incorporation of additional water quality protection devices or practices. Water quality BMP's will be designed in accordance with Ohio EPA specifications.	City of Hilliard	2021-2026

Figure 1

Table of Organization

Figure 1 - Table of Organization



Appendix A

OEPA NPDES Permit Coverage Approval

Mike DeWine, Governor
Jon Husted, Lt. Governor
Laurie A. Stevenson, Director

May 13, 2021

CITY OF HILLIARD
Clark Rausch
3800 MUNICIPAL WAY
HILLIARD, OH 43026

Re: Approval Under Ohio EPA National Pollutant Discharge Elimination System (NPDES) - Small MS4 General Permit - OHQ000004

Dear Applicant,

Your NPDES Notice of Intent (NOI) application is approved for the following facility/site. Please use your Ohio EPA Facility Permit Number in all future correspondence.

Facility Name:	CITY OF HILLIARD
Facility Location:	3800 MUNICIPAL WAY
City:	HILLIARD
County:	FRANKLIN
Township:	NORWICH
Ohio EPA Facility Permit Number:	4GQ10008*DG
Permit Effective Date:	May 13, 2021
Permit Expiration Date:	Mar 31, 2026

Please read and review the permit carefully. The permit contains requirements and prohibitions with which you must comply. Coverage under this permit will remain in effect until a renewal of the permit is issued by the Ohio EPA.

A copy of the general permit may be viewed or downloaded rom the following web address: http://epa.ohio.gov/dsw/permits/gpfact.aspx
To view your electronic submissions and permits please Logon in to the Ohio EPA's eBusiness Center at http://ebiz.epa.ohio.gov.

If you need assistance or have questions please call (614) 644-2001 and ask for Small MS4 General Permit support or visit our website at http://www.epa.ohio.gov.

Sincerely,

Laurie A. Stevenson
Director

Appendix B

IDDE Plan

Real People. Real Possibilities.™

City of Hilliard Illicit Discharge Detection and Elimination Program Plan

Updated 2017

INTRODUCTION

This Illicit Discharge Detection and Elimination (IDDE) Program Plan was developed to outline the measures the City of Hilliard is maintaining to prohibit, detect and eliminate illicit discharges into their municipal separate storm sewer system (MS4). The City uses a combination of mapping, monitoring, education, and enforcement as the primary means of implementing this program.

The City is entering into its third 5-year permit, and as such, has completed the basic requirements outlined in Minimum Control Measure (MCM) III of their stormwater general permit. While the initial mapping and Dry Weather Screening has been completed, there continues to be ongoing efforts to both monitor for and address any illicit discharge issues identified as well as undertaking a variety of public education activities.

This document was produced in accordance with the NPDES Small MS4 Stormwater General Permit (OHQ000003) issued to the City by the Ohio Environmental Protection Agency (OEPA). This permit was made effective on September 11, 2014, and is to remain in effect until September 19, 2019. This document is subject to periodic updates as OEPA clarifies or modifies the language of the permit.

DEFINITIONS

The following definitions are provided here as they are critical to the MCM III and the stormwater permit. Please see: Definitions and Initialisms Associated with this document at the end of this document for a more complete set of definitions.

The regulatory definition of an *MS4* (40 CFR 122.26(b)(8)) is:

> "a conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains):

(i) Owned or operated by a state, city, town, borough, county, parish, district, association, or other public body (created to or pursuant to state law) including special districts under state law such as a sewer district, flood control district or drainage district, or similar entity, or an Indian tribe or an authorized Indian tribal organization, or a designated and approved management agency under section 208 of the Clean Water Act that discharges into waters of the United States.

(ii) Designed or used for collecting or conveying stormwater;

(iii) Which is not a combined sewer; and (iv) Which is not part of a Publicly Owned Treatment Works (POTW) as defined at 40 CFR 122.2."

An *Illicit Discharge* as defined in the Code of Federal Regulations (C.F.R.) at 40 C.F.R. 122.26 (B)(2) means:

> "any discharge to an MS4 that is not composed entirely of storm water, except for those discharges to an MS4 pursuant to a NPDES permit."

The following discharges are exempt until such time as they are determined by the City of Hilliard to be significant contributors of pollutants to the MS4. Other water sources not containing pollutants may be considered at the discretion of the City Engineer. See City of Hilliard Code 949.02-'Use of Public Sewers Required' for an elaboration on these conditions.

- line flushing
- landscape irrigation
- diverted stream flows
- rising water ground waters
- uncontaminated ground water infiltration
- uncontaminated pumped ground water
- discharges from potable water sources
- foundation drains
- air conditioning condensate
- irrigation water
- springs
- water from crawl space pumps
- footing drains
- lawn watering
- individual residential car washing
- small charity car washes
- flows from riparian habitats and wetlands
- dechlorinated swimming pool discharges
- street wash water
- discharges or flows from fire-fighting activities

RATIONAL AND APPROACH

Being a well-established program at the time of this plan update, Hilliard has a thorough understanding of the issues related to IDDE in their community. Dry weather screening (DWS) of all outfalls has been completed during the previous permit term. Through the process of DWS, it was discovered that the commercial and industrial areas were the largest contributors of pollution to the City's MS4. The second most common issue is effluent from aerators that were not functioning as designed. DWS has shown to be a very beneficial way to monitor the City's MS4 and current plans are to continue this practice on a yearly basis.

The City is utilizes a Service Request Center (SRC) to assist the City in addressing needs of citizens and employees. The SRC is capable of receiving a request for service, including stormwater quality concerns, tracking work associated with a service request, and notifying citizens when a service request has been completed. Moving forward, the core of MCM III efforts will be on maintaining a strong working relationship between the City, FSWCD and FCPH, reports of issues, dry weather screening, as well as providing education to employees, businesses and the general public on stormwater and stormwater pollution topics. Please reference sections MCM I and MCM II in the Stormwater Management Plan.

Hilliard has established the following BMPs which they report on annually as required by their NPDES Small MS4 Stormwater General Permit. MCM III, as well as the other MCMs and associated BMPs are outlined in Hilliard's Stormwater Management Plan.

Established BMPs:

Ordinance Prohibiting Illicit Discharges

Storm Sewer System Map

HSTS Mapping and List

IDDE Plan

Dry-Weather Screening of Outfalls

ORDINANCE PROHIBITING ILLICIT DISCHARGES

Hilliard adopted and maintains ordinances 949.02-'Use of Public Sewers Required' which the City uses for enforcement of pollution of their MS4 and waterways. It contains the following:

> *(a) It shall be unlawful for any person to place, deposit or permit to be deposited in an insanitary manner on public or private property within the City, or in any area under the jurisdiction of the City, any human or animal excrement, garbage or other objectionable wastes.*
>
> *(b) It shall be unlawful to discharge to any natural outlet within the City, or any area under the jurisdiction of the City, any sanitary sewage, industrial wastes or other polluted water, except where suitable treatment has been provided in accordance with subsequent provisions of this chapter*
>
> *(e) It shall be unlawful for any person to place or deposit into any outfall, drainage facility, storm sewer or watercourse within the City any garbage, trash, yard waste, soil, rock or similar material, or any other substance which obstructs flow in the system or damages the system or interferes with the proper operation of the system or which constitutes a nuisance or a hazard to the public.*

In addition, this ordinance defines the types of permitted discharges and outlines the conditions requiring owners to connect to sanitary sewer if their property line is within 100' of a sanitary sewer.

STORM SEWER SYSTEM MAP

All stormwater structures comprising Hilliard's MS4 have been identified, mapped, and assigned attributes relative to material and size in the City's GIS. This system mapping includes: inlet structures, outfall locations, stormwater piping, open drainage, and post-construction BMPs. In addition, waters of the state that the MS4 outlets to are mapped and identified with GNIS naming. As structures are upgraded, replaced, discovered, or

installed as new, they are appended to the existing GIS layers which make up the storm sewer system map. There are no combined sewers within the City of Hilliard.

HSTS MAPPING AND LIST

In addition to the MS4 mapping, the City maintains a layer in coordination with Franklin County Public Health for all of the aeration systems within the municipality as well as their outfall locations. This mapping is updated as systems are removed from service or as other updates are needed.

DRY WEATHER SCREENING OF OUTFALLS

To screen for illicit discharges, a process known as Dry Weather Screening (DWS) is utilized. This process requires field inspection of drainage features (components of the MS4) during periods of dry weather. Dry weather for this screening is defined as having a maximum of 0.1" of rain during the previous 72 hours. This 'dry weather' protocol helps to minimize flows due to rain or snow melt events and highlight illicit discharges.

The City of Hilliard maintains approximately 167 miles of stormsewer pipe which result in approximately 278 storm water outfalls. Dry weather screening has been completed for all of these outfalls. All outfalls where potential illicit discharges were found were subsequently visited to determine the source of the discharge and remedy the pollution issue.

For the continued monitoring of their MS4, the City plans to revisit one third of the MS4 outfalls on a yearly basis, so that all MS4 outfalls will be screened at least once per permit term. Any new outfalls added due to construction activities, or discovered during the screenings will be added to the outfalls to be screened in the future.

For the City of Hilliard, there appear to be two dominant land use classifications that potential illicit discharges were found to originate from. The first are homes with aeration systems which periodically do not function as intended due to maintenance issues. These occurrences are reported to and dealt with by Franklin County Public Health. The second classification is flows from industrial/commercial areas. Most of these flows are transient flows resulting in something other than stormwater being introduced into the MS4. The reports of these occurrences are entered into the City's Service Request Center and managed through resolution.

PROCEDURES FOR TRACING AND ELIMINATING ILLICIT DISCHARGES

When an illicit discharge is discovered through DWS or is reported to the Operations Division of the Public Service Department, every effort is taken to the maximum extent practicable to find and eliminate the discharge. If a non-sewage potential discharge is discovered through dry weather screening, inspections will be conducted by proceeding manhole by manhole, consulting the storm sewer system map, to determine where the flow is originating. The determination will then be reported to the Service Department or entered into the SRC for tracking the incident through to resolution.

If a potential sewage discharge is discovered, it is reported to FCPH who undertakes the tracing of the flow and resolution of the issue. A majority of this type of flow results from aeration systems that are not functioning as intended.

If the discharge is the result of a spill, spill contaminant procedures will begin to isolate the discharge. In the event that the spill is the result of a sanitary sewer break, the city of Hilliard's emergency response plan will be implemented.

PUBLIC EDUCATION

Success of the City's IDDE Program depends, in part, on communicating to and educating public employees, businesses and the general public of the hazards associated with illicit discharges and the improper disposal of waste. The goal of this communication and outreach is for the community to understand the IDDE program, why it is required and its purpose, who is responsible for its implementation, how it will be implemented, and how they can become part of the solution for stormwater management.

Communication and Outreach efforts are defined in detail in the City's Stormwater Management Program plan within the sections outlining activities for MCM I and MCM II. Examples of activities include education/information related to: HSTS, litter and other debris, fats oils and grease, fertilizers and pesticides, sediment and stormwater runoff.

In addition, the City maintains a Stormwater webpage with information on current efforts and applicable contact information and additional information: http://hilliardohio.gov/government/departments/public-service/engineering-division/stormwater-management

REPORTING POLLUTION

The IDDE Program benefits from citizen reports regarding spills, illegal dumping, sewage and other observed pollution. To report any condition that requires attention within Hilliard city limits, residents and City personnel can contact the Public Service Department/Operations division by calling (614) 334-2467 or by contacting the Service Request Center by phone: (614) 876-7361 or online: [http://src.hilliardohio.gov/]. Incident tracking is then implemented by the use of the City's Service Request Center. All reported incidents are investigated by the Public Service Department Staff during normal working hours.

In addition, OEPA maintains a task force of responders for complaints of chemical spills into the waters of the state. The toll-free 24/7 hotline is 800-282-9378. More information can be found at http://www.epa.ohio.gov/derr/ersis/er/er.aspx .

FCPH has an after-hours emergency phone number for emergency calls outside of business hours for chemical spills affecting MS4s at 614-525-3965. FCPH also provides on online form for sewage related complaints which can be found at: http://www.fcbhforms.org/view.php?id=31

Citizens are encouraged to report any water pollution related complaint or concern outside of HSTS and emergency spills to Franklin Soil and Water Conservation District, (614) 486-9613.

Non- emergencies can also be reported to the Ohio EPA Central District Office, 1-800-686-2330.

IDDE PROGRAM EVALUATION AND MANAGEMENT

Clyde R. Seidle, Director of Public Service and Larry M. Lester Jr., Deputy Director of Public Service coordinate and evaluate all aspects of their IDDE Program on a yearly basis and work with other public agencies and partners to carry out the required activities described both in this document and in the City's Stormwater Management Program Plan.

DEFINITIONS AND INITIALISMS ASSOCIATED WITH THIS DOCUMENT

BMP: Best Management Practices: means schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to prevent or reduce the pollution of surface waters of the State. BMPs also include treatment requirements, operating procedures, and practices to control runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage.

CWA: Clean Water Act (33 U.S.C. §1251 et seq. (1972)): establishes the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality standards for surface waters. The basis of the CWA was enacted in 1948 and was called the Federal Water Pollution Control Act, but the Act was significantly reorganized and expanded in 1972. The "Clean Water Act" became the Act's common name with its amendments in 1977 (US EPA). The CWA provides the statutory basis for the NPDES permit program and the basic structure for regulating the discharge of pollutants from point sources to waters of the United States. Section 402 of the CWA specifically requires EPA to develop and implement the NPDES program.

DWS: Dry Weather Screening; the in-field process undertaken to fix the geospatial location of outfalls, record basic characteristics of the outfalls, and screen for illicit discharges and their relative severity. This field work is conducted only during periods of dry weather.

FCPH: Franklin County Public Health

FSWCD: Franklin Soil and Water Conservation District

HSTS – also referred to as STS: Home Sewage Treatment System; a means of treating waste water and sewage on site. These systems do not connect into municipal sanitary sewer systems. Types of systems include: aeration units, septic tanks, leach fields, mound systems and drip systems. There are 2 general classifications of HSTS systems Off-Lot and On-Lot. **Off-Lot Home Sewage Treatment Systems** are designed to treat home sewage on-site and discharges treated wastewater off-lot. **On-Lot Home Sewage Treatment Systems** are designed to treat home sewage on-lot with no discharges leaving the lot

IDDE: Illicit Discharge Detection and Elimination; a program mandated by the NPDES program developed to detect and eliminate illicit discharges

Illicit Discharge: defined at 40 CFR 122.26(b)(2) and refers to any discharge to a municipal separate storm sewer that is not entirely composed of storm water, except discharges authorised under an NPDES permit (other than the NPDES permit for discharges from the MS4) and discharges resulting from fire fighting activities.

MEP: Maximum Extent Practicable; the technology-based discharge standard for Municipal Separate Storm Sewer Systems to reduce pollutants in storm water discharges that was established by CWA '402(p). A discussion of MEP as it applies to small MS4s is found at 40 CFR 122.34.

MS4: Municipal Separate Storm Sewer System; a conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters,ditches, man-made channels, or storm drains) that are:

> *Owned or operated by the federal government, state, municipality, township, county, district, or other public body (created by or pursuant to state or federal law) including special district under state law such as a sewer district, flood control district or drainage districts, or similar entity, or a designated and approved management agency under section 208 of the act that discharges into surface waters of the state; and*
>
> *Designed or used for collecting or conveying solely storm water,*

Which is not a combined sewer, and which is not a part of a publicly owned treatment works

MS4 Outfall: a point source at the point where a municipal separate storm sewer discharges to surface waters of the State and does not include open conveyances connecting two municipal separate storm sewers, or pipes, tunnels or other conveyances that connect segments of the same stream or other surface waters of the state and are used to convey waters of the state.

NPDES: National Pollutant Discharge Elimination System, Federal regulation implemented at the state and local level to regulate point sources of pollution into surface waters. The Franklin SWCD assists the county in regulating soil and erosion sediment control from construction sites. The authority to regulate this comes from the NPDES Program. For more information, refer to: http://cfpub.epa.gov/npdes/index.cfm

OEPA: Ohio Environmental Protection Agency

SRC: Service Request Center

Storm Water: defined at 40 CFR 122.26(b)(13) and means storm water runoff, snow melt runoff, and surface runoff and drainage.

SWMP: Storm Water Management Program; refers to a comprehensive program to manage the quality of storm water discharged from the municipal separate storm sewer system.

Waters of the United States (receiving waters): All waters that are currently used, were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters subject to the ebb and flow of the tide. Waters of the United States include all interstate waters and intrastate lakes, rivers, streams (including intermittent streams), mudflats, sand flats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds. [See 40 CFR 122.2 for the complete definition.] The NPDES permit regulates flows to the Waters of the United States.

Appendix C

OEPA Illicit Discharge Identification Form

NPDES Small MS4 General Permit
Illicit Discharge Reporting Form

State of Ohio Environmental Protection Agency
Division of Surface Water

In accordance with Part III.B.3.j.v of OHQ000004, use this form to notify Ohio EPA if any of the following illicit discharges are detected discharging to your MS4:

- Illicit sanitary cross connections from industrial, commercial, or multi-family sources; and
- Leaking or broken sanitary sewer lines that are actively contributing sewage to your MS4.

Within 24 hours of discovery of the source of the illicit discharge, this form is to be completed and emailed to the appropriate Ohio EPA district office using one of the following addresses:

Southeast District Office: ***sedo24hournpdes@epa.ohio.gov***
Southwest District Office: ***swdo24hournpdes@epa.ohio.gov***
Northwest District Office: ***nwdo24hournpdes@epa.ohio.gov***
Northeast District Office: ***nedo24hournpdes@epa.ohio.gov***
Central District Office: ***cdo24hournpdes@epa.ohio.gov***

Permittee Information	
Name of MS4 Permittee:	
NPDES Facility Permit Number:	
Contact Name for Permittee:	
Contact Telephone Number:	( ) -
Contact Email Address:	

Illicit Discharge Information					
Please provide: • A general description of the illicit discharge that was detected, • An estimate of volume (gpd), • The identified source (if known), • Any analytical data (if taken), • Potential for human contact (low, medium, high), and • Is there any evidence of any distressed or dead wildlife?					
Date/time illicit discharge began: ☐ Unknown		Date:	/ /	Time:	
Date/time illicit discharge discovered:		Date:	/ /	Time:	
Location of the illicit discharge (lat/long):					
Stormwater Outfall ID/Number (if known):					
Did discharge reach a water of the state?					☐ Yes ☐ No
If Yes, list affected waterbodies:					
Who else have you notified? (fire department, health department, water treatment plant, downstream MS4, facility responsible, etc.) include contact name(s) and phone number(s):					
Has illicit discharge been eliminated?					☐ Yes ☐ No
If Yes, date/time illicit discharge eliminated:		Date:	/ /	Time:	
If No, describe actions taken to contain the illicit discharge and estimated schedule for elimination:					

Appendix D

SWP3 Review Checklist

Construction General Permit OHC000005
Storm Water Pollution Prevention Plan Checklist

State of Ohio Environmental Protection Agency
Division of Surface Water

Facility Name:	**Date Received:**
SWP3 Reviewer:	**Date Reviewed:**

Part III.G.1 - Site Description				
Does the SWP3 describe, show or include:	**Y**	**N**	**N/A**	**Comments**
(a) the nature and type of construction activity (e.g., low density residential, shopping mall, highway, etc.)?				
(b) the area of the site to be disturbed				
(c) the impervious area and percent imperviousness created by the construction activity?				
(d) storm water calculations, (pre and post-construction volumetric runoff coefficients and resulting water quality volume; design details for post-construction storm water facilities and pretreatment practices (e.g. drainage areas, capacities, elevations, outlet details and drain times) and if applicable, explanation of the use of existing post-construction facilities?				
(e) any existing data describing the soil?				
any information on the quality of the storm water discharge from the construction site?				
(f) any information about prior land uses at the site (e.g., was the property used to manage solid or hazardous waste)?				
(g) a description of the condition of on-site streams (e.g. prior channelization, bed instability or headcuts, channels on public maintenance, or natural channels)?				
(h) an implementation schedule which describes the sequence of major construction operations (i.e., grubbing, excavating, grading, utilities infrastructure installation and others) and the implementation of erosion, sediment and storm water management practices or facilities to be employed during each operation of the sequence?				
(i) the name(s) or location(s) of the initial and subsequent surface water bodies receiving the storm water discharge?				
the areal extent and description of the wetland or other special aquatic sites which will be disturbed and/or will receive the storm water discharges?				
(j) a detail drawing of a typical individual lot showing sediment and erosion controls or storm water control practices? (This does not remove responsibility to designate control practices in a SWP3 for critical areas such as steep slopes, stream banks, drainage ways & riparian zones.)				
(k) the location and description of storm water discharges associated with dedicated asphalt and/or concrete batch plants covered by the NPDES construction storm water general permit?				
(l) a cover page identifying the name and location of the site, the name and contact information for site operators and SWP3 authorization agents as well as preparation date, start date, and completion date?				
(m) a log documenting grading & stabilization activity as well as SWP3 amendments that occur after construction commencement?				

Part III.G.1.n - Site Map Requirements				
Does the SWP3 site map show:	**Y**	**N**	**N/A**	**Comments**
(i) limits of earth-disturbing activity of the site including associated off-site borrow or spoil areas that are not addressed by a separate NOI and associated SWP3?				
(ii) soils types depicted for all areas of the site, including locations of unstable, highly erodible and/or known contaminated soils?				
(iii) existing and proposed contours to delineate drainage watersheds expected during and after major grading activities as well as the size of each drainage watershed, in acres?				
(iv) location of any delineated boundary for required riparian setbacks?				
(v) conservation easements for areas designated as open space, preserved vegetation or otherwise protected from earth disturbing activities with a description of any associated temporary or permanent fencing or signage?				
(vi) surface water locations including springs, wetlands, streams, lakes, water wells, etc., on or within 200 feet of the site, including the boundaries of wetlands or stream channels and first subsequent named receiving water(s) the permittee intends to fill or relocate for which the permittee is seeking approval from the Army Corps of Engineers and/or Ohio EPA?				
(vii) the location of existing and planned buildings, roads, parking facilities, and utilities?				
(viii) include the location of all erosion and sediment control practices, including the location of areas likely to require temporary stabilization during site development?				
(ix) location of sediment traps and basins noting their sediment storage volume and dewatering (detention) volume and contributing drainage area?				
(x) location of permanent storm water management practices (new & existing) as well as pretreatment practices to be used to control pollutants in storm water after construction operations have been completed along with the location of existing and planned drainage features (e.g. catch basins, culverts, ditches, swales, surface inlets and outlet structures)?				
(xi) areas designated for the storage or disposal of solid, sanitary, and toxic wastes (including dumpster areas), areas designated for cement truck washout, and areas for vehicle fueling?				
(xii) location of designated construction entrances where the vehicles will access the construction site?				
(xiii) location of any areas of proposed floodplain fill, floodplain excavation, stream restoration or known temporary or permanent stream crossings?				

Part III.G.2 - Sediment & Erosion Controls				
(a) Preservation Methods	**Y**	**N**	**N/A**	**Comments**
(1) Has every effort been made to preserve the natural riparian setback adjacent to streams or other surface water bodies? (E.g. preserving existing vegetation, vegetative buffer strips, and existing soil profile and topsoil; and designating tree preservation areas or other protective clearing or grubbing practices.				

(2) Have efforts been made to phase in construction activities to minimize the amount of land disturbance at one time?				
(3) Will any portions of the site be left undisturbed (e.g., tree preservation areas)?				
(b) Erosion Control Practices	**Y**	**N**	**N/A**	**Comments**
(1) Does the SWP3 include erosion controls to provide cover over disturbed soils?				
(2) Does the SWP3 describe the control practices used to re-establish suitable cover (e.g. vegetation) on disturbed areas after grading?				
(3) Does the SWP3 specify the types of stabilization measures to be employed for any time of the year?				
(b)(i) & Part II.B (Table 2): Temporary Stabilization	**Y**	**N**	**N/A**	**Comments**
For disturbed areas within 50 feet of a stream remaining dormant for over 14 days, will temporary erosion controls be applied within 2 days?				
For disturbed areas over 50 feet away from a stream remaining dormant for over 14 days, will temporary erosion controls be applied within 7 days?				
For disturbed areas that will be left idle over winter, will temporary erosion controls be applied prior to onset of winter weather?				
(b)(i) & Part II.B (Table 1): Permanent Stabilization	**Y**	**N**	**N/A**	**Comments**
For disturbed areas within 50 feet of a stream at final grade, will permanent erosion controls be applied within 2 days of reaching final grade?				
For disturbed areas remaining dormant for over 1 year or at final grade, will permanent erosion controls be applied within 7 days of the most recent disturbance?				
(b)(ii) Permanent Stabilization of Conveyance Channels				
Will operators undertake special measures to stabilize channels and outfalls and prevent erosive flows?				
(c) Runoff Control Practices - Does the SWP3 incorporate	**Y**	**N**	**N/A**	**Comments**
(1) measures to reduce flow rates on disturbed areas (e.g., riprap, rock check dams, & pipe slope drains)?				
(2) measures to divert runoff from disturbed areas and steep slopes?				
(d) Sediment Control Practices	**Y**	**N**	**N/A**	**Comments**
(1) Will sediment control devices be implemented for all areas remaining disturbed for over 14 days?				
(2) Are detail drawings of the sediment controls to be used included in the SWP3?				
(d)(i) Timing of Installing Sediment Controls.	**Y**	**N**	**N/A**	**Comments**
Does the SWP3 specify that sediment controls will be implemented prior to grading and within 7 days of grubbing?				
Does the SWP3 require additional sediment controls or modifications for changing slopes and topography?				
(d)(ii) Sediment Settling Ponds	**Y**	**N**	**N/A**	**Comments**
Does the SWP3 include the use of a sediment settling pond? *NOTE: This is required for areas with concentrated runoff or when the capacity of sediment barriers or inlet protection has been exceeded.*				
Are alternatives proposed in lieu of a required settling pond? These must be equivalent to a sediment settling pond effectiveness.				
Is the dewatering volume appropriately sized (67 yd^3 or 1800 ft^3 per acre of drainage area)?				

Is the depth of the dewatering volume for each sediment settling pond ≤5 feet?				
Will the dewatering volume drain in 48 hours to 72 hours?				
Is a skimmer specified in the SWP3?				
Has a sediment storage zone volume been provided (≥ 1000 ft^3 per disturbed acre or based on RUSLE calculations?				
Is the length to width ratio of the settling pond ≥ 2:1? *NOTE: Greater distances from storm water inlet of the pond to the outlet increase effectiveness of sediment settlement.*				
Is clean-out of the sediment storage zone specified in the SWP3? (E.g. when sediment occupies 50 percent of the sediment storage zone and prior to conversion to a post-construction BMP.)				
Have public safety concerns been considered in pond design and alternative sediment controls?				
(d)(iii) Sediment Barriers & Diversions	**Y**	**N**	**N/A**	**Comments**
Are sediment barriers or diversions used to intercept sheet flow? *NOTE: Sediment barriers are suitable for sheet flow and not for concentrated storm water flow.*				
Are alternative sediment barriers, used in lieu of silt fence, at least 12-inches in diameter?				
Are diversions used to keep runoff away from steep slopes or concentrated flow?				
Do sediment barriers meet the maximum drainage area limits of table 3 or the Rainwater and Land Development manual?				

(d)(iv) Inlet Protection	**Y**	**N**	**N/A**	**Comments**
Do drain inlets and curb inlets drain into a sediment settling pond?				
Inlets not connected to a sediment settling pond are limited to runoff from ≤ one acres?				
Does inlet protection meet acceptable standards?				
(d)(v) Stream Protection	**Y**	**N**	**N/A**	**Comments**
No structural sediment controls are proposed for use in streams.				
Have efforts been made to limit construction disturbance or activities on stream banks, and the width or number of stream crossings? *NOTE: If work along a stream bank is necessary, a non-erodible pad or non-erodible stream diversion dams (sand bags) must be installed. If stream crossings are necessary, a non-erodible stream crossing must be installed.*				

Part III.G.2.e – Post-Construction Storm Water Management				
	Y	**N**	**N/A**	**Comments**
Does the SWP3 include the installation of a structural post-construction BMP. *NOTE: Projects that do not significantly grade or impact pervious areas or install impervious surface such as park lands do not require the installation of post-construction BMPs.*				
Is the construction activity a linear project (e.g., pipeline or utility line installation) that does not result in the installation of additional impervious surface? *NOTE: If yes, then the installation of structural post-construction BMPs is not required.*				
Maintenance Plans	**Y**	**N**	**N/A**	**Comments**
Has a long-term maintenance plan been developed or included in the SWP3 for maintenance of the structural post-construction BMP?				

NOTE: The long-term maintenance plan must be developed and provided to the post-construction site operator.				
Does the long-term maintenance plan include the following?				
(1) an entity designated for storm water inspection and maintenance responsibilities?				
(2) the routine and non-routine maintenance tasks to be undertaken?				
(3) a schedule for inspection and maintenance?				
(4) any necessary legally binding maintenance easements and agreements?				
(5) construction drawings or excerpts showing the facility plan view and profile, as well as details of the outlet(s)?				
(6) a map showing all access and maintenance easements?				
(7) a description of how pollutants will be removed and disposed of?				
Does the SWP3 include a structural post-construction BMP designed to release the water quality volume over a 24-hour to 48-hour time period?				
Calculation of Water Quality Volume (WQv)	**Y**	**N**	**N/A**	**Comments**
Is the calculation of the WQv,shown? With correct values used for the following:				
(a) runoff coefficient (Rv), where Rv = 0.05 + 0.9i i = ratio of impervious surface				
(b) precipitation depth (P = 0.9 inches)?				
(c) and the drainage area (A) to the BMP?				
If the structural post-construction BMP will be used for sediment storage, does it include a sediment accumulation volume of at least 20% of the WQv?				
If a regional storm water BMP will be used to meet the post-construction requirements, does it:				
(1) meet the design requirement for treating the WQv?				
(2) have a legal agreement established with the BMP owner for long-term maintenance?				
Table 4a Do extended detention practices **s**how an appropriate minimum drain time that shall not discharge more than the first half of the WQv in less than one-third of the drain time? *NOTE: Dry = 48 hr; Wet, wetland, permeable pavement, underground storage, and sand/media filtration min. 24, <72 hr.*				
Table 4a Do extended detention practices show appropriate design features? • Wetland and wet basins: permanent pool = 1WQv • Dry, wet and wetland: sediment storage = 0.2WQv • Dry: forebay and micro-pool or acceptable pretreatment and a protected outlet. Underground storage: acceptable pretreatment capable of ≥ 50%TSS.				
Table 4b Do planned infiltrating practices show an appropriate maximum drain time? Note: Bioretention and infiltration basin ≤ 24; infiltration trench, permeable pavement and underground storage ≤ 48 hours.				
Table 4b Do planned infiltrating underground storage practices (for credit) show acceptable of pretreatment of ≥ 80% TSS.				
Small Construction Activities ≤ 2 Acres If the SWP3 proposes to use an alternative BMP instead of a Table 4a or 4b practice,	**Y**	**N**	**N/A**	**Comments**

(1) does the SWP3 provide justification on why a standard BMP is infeasible and their use would prevent the project?				
(2) Is the alternative BMP acceptable to the local MS4 or jurisdiction?				
Transportation Projects	**Y**	**N**	**N/A**	**Comments**
For (public road construction activities), are the post-construction BMPs designed consistent with the Ohio Department of Transportation's "Location and Design Manual, Volume Two?"				
Offsite Mitigation of Post-Construction If the SWP3 is proposing to use an offsite post-construction BMP, then does the SWP3 include:	**Y**	**N**	**N/A**	**Comments**
(1) a maintenance agreement or policy is established to ensure operations and treatment long-term?				
(2) the offsite location discharges to the same HUC-12 watershed unit?				
(3) the mitigation ratio of the WQv is 1.5 to 1 or the WQv at the point of retrofit, whichever is greater?				
Previously Developed Areas (Redevelopment)	**Y**	**N**	**N/A**	**Comments**
For construction of a previously developed area, was one of the following options used to as a post-construction practice:				
(a) 20% net reduction in the site's volumetric runoff coefficient?				
(b) a BMP sized to treat 20% of the WQv for the previously developed area using a standard BMP from Tables 4a or 4b?				
For construction involving both previously developed and undeveloped land, was equation 3 shown to calculate the WQv? $WQv = 0.9inches * A * [(Rv_1 * 0.2) + (Rv_2 – Rv_1)]/12$				
Runoff Reduction Practices:	**Y**	**N**	**N/A**	**Comments**
If the SWP3 proposes to use runoff reduction methods to reduce the WQv or size of post-construction practices, are one of the following acceptable practices being used with appropriate credit? • Green Roof • Impervious Surface Disconnection • Rainwater Harvesting • Bioretention Area/Cell • Infiltration Basin • Infiltration Trench • Permeable Pavement (Infiltration) • Underground Storage (Infiltration) • Grass Swale • Sheet Flow to Filter Strip Sheet Flow to Conservation Area				
Do practices meet Ohio EPA's Rainwater and Land Development Manual specifications?				
Is any runoff reduction practice(s) used to meet the groundwater recharge requirements for the Big Darby Creek Watershed shown in recharge calculations?				
Is any runoff reduction practice used meet post-construction requirement for areas that cannot drain to a structural practice (e.g., backyards of residential lots) shown in calculations?				
Alternative Post-Construction BMPs	**Y**	**N**	**N/A**	**Comments**

If the SWP3 proposes to use alternative post-construction BMPs to those of Tables 4a and 4b practices, has approval been obtained from Ohio EPA? (Attach correspondence & Alt. Practice Form)				

Part III.G.2.f - Surface Water Protection	**Y**	**N**	**N/A**	**Comments**
Does the site contain any streams, rivers, lakes, or wetlands?				
If so, has the U.S. Army Corps of Engineers been contacted for a determination of impacts requiring Clean Water Act 401 or 404 permitting? (Attach any reference numbers)				
For storm water discharges from BMPs into wetlands, have appropriate BMPs been proposed to treat and diffuse flows?				

Part III.G.2.g - Other Controls				
(Non-sediment pollutant controls, tracking, dust, wastes, dewatering, and contaminated sediments)				
Handling of Toxic or Hazardous Materials	**Y**	**N**	**N/A**	**Comments**
(1) The SWP3 considers and addresses potential toxic or hazardous wastes and their proper disposal?				
(2) The SWP3 addresses the need and methods to exclude waste materials or wastewater (e.g. from washout) from storm water or waters of the state? and of responding to chemical spills and leaks (e.g. directs to onsite Spill Prevention Control and Countermeasure (SPCC) plan).				
(3) The SWPPP addresses potential materials and responses to chemical spills and leaks (e.g. directs to onsite Spill Prevention Control and Countermeasure (SPCC) plan).				
Waste Disposal	**Y**	**N**	**N/A**	**Comments**
Covered and leak-proof containers are planned for disposal of debris, trash, hazardous or petroleum wastes?				
As applicable, the SWP3 states that all waste will comply with applicable state or local waste disposal requirements and provisions address issues such as open burning, sanitary wastes and construction and demolition debris?				
Clean Hard Fill	**Y**	**N**	**N/A**	**Comments**
(1) If disposal of bricks, hardened concrete, and/or soil is planned, are these materials required to be free from contamination that may leach to waters of the state?				
(2) If clean construction wastes will be disposed into the property, have are there any local prohibitions from this type of disposal?				
Construction Chemical Compounds	**Y**	**N**	**N/A**	**Comments**
(1) Does the SWP3 designate areas used for mixing or storage of compounds such as fertilizers, lime, asphalt, or concrete?				
(2) If so, are these areas located away from watercourses, drainage ditches, field drains, or other storm water drainage areas?				
Equipment Fueling & Maintenance	**Y**	**N**	**N/A**	**Comments**
(1) Does the SWP3 designate areas used for fueling or performing vehicle maintenance that provide separation from watercourses, drainage ditches, field drains, or other storm water drainage areas?				
(2) If applicable, has a spill prevention control and countermeasures (SPCC) plan been developed?				

NOTE: An SPCC plan is required for sites which have the following: • Aboveground oil/fuel storage capacity of more than 1,320 gallons in all containers 55 gallons or greater in volume, or • Underground oil/fuel storage capacity of more than 42,000 gallons.				
Concrete Wash Waters	**Y**	**N**	**N/A**	**Comments**
(1) Does the SWP3 designate areas used for concrete chute cleaning or other concrete wash waters that are these areas located away from watercourses, drainage ditches, field drains, or other drainage areas?				
Trench & Ground Water Control	**Y**	**N**	**N/A**	**Comments**
Does the construction site have an onsite trench or pond that must be dewatered?				
If so, does the SWP3 call for the discharge of potentially turbid water through a filter bag, sump pit, or other sediment removal device?				
Contaminated Soils	**Y**	**N**	**N/A**	**Comments**
If applicable, does the SWP3 address proper handling and disposal of soils contaminated by petroleum or other chemical spills? *NOTE: Contaminated soils must be treated and/or disposed in Ohio EPA approved solid waste management facilities or hazardous waste treatment, storage or disposal facilities.*				
If the facility contains contaminated soil, which of the following practices will be used to prevent contamination from being released?				
(1) Berms, trenches, and pits used to collect contaminated runoff and prevent discharges;				
(2) Runoff is planned to be pumped into a sanitary sewer (requires prior approval of the sanitary sewer operator) or into a container for transport to an appropriate treatment/disposal facility;				
(3) Areas of contamination are planned for covering with tarps or other methods that prevent storm water from coming into contact with the material.				
Spill Reporting Requirements	**Y**	**N**	**N/A**	**Comments**
(1) The SWP3 describes procedures in the event of a small release (less than 25 gallons) of petroleum waste? *NOTE: Petroleum-based and concrete curing compounds must have special handling procedures.*				
(2) The SWP3 describe what to do in the event of a larger release (25 or more gallons) of petroleum waste? *NOTE: Ohio EPA (1-800-282-9378), the local fire department, and the local emergency planning committee (LEPC) must be contacted within 30 minutes of a spill of 25 or more gallons.*				
Open Burning	**Y**	**N**	**N/A**	**Comments**
(1) If applicable, does the SWPPP restrict open burning to legal limits (as defined in OAC 3745-19)?				
Dust Controls/Suppressants	**Y**	**N**	**N/A**	**Comments**
(1) If dust suppressants are proposed in the SWP3, are application areas away from catch basins for storm sewers or other drainage ways? *NOTE: Used oil may not be used as a dust suppressant*				
Air Permitting Requirements	**Y**	**N**	**N/A**	**Comments**
(1) If applicable (e.g. *mobile concrete batch plants, mobile asphalt plants, concrete crushers, and large generators) have* appropriate				

measures been taken to ensure that all air pollution permits have been obtained?				
(2) In the case of applicable restoration or demolition projects, a notification will be submitted to Ohio EPA, Division of Air Pollution Control to determine if asbestos corrective actions are required?				
Process Wastewater/Leachate Management	**Y**	**N**	**N/A**	**Comments**
All process wastewaters (e.g., equipment washing, leachate associated with on-site waste disposal, and concrete wash-outs) be collected and disposed of properly (e.g., to a publicly-owned treatment works)? *NOTE: The NPDES construction storm water general permit only authorizes the discharge of storm water and certain uncontaminated non-storm waters. The discharge of non-storm waters to waters of the state may be in violation of local, state, and federal laws or regulations.*				
Additional Concerns	**Y**	**N**	**N/A**	**Comments**
For construction activities involving the installation and/or replacement of a centralized sanitary system, (including sewer extensions) or a sewerage system (except those serving one, two, and three family dwellings) and potable water lines, a PTI application was submitted to Ohio EPA? *NOTE: Coverage under the NPDES construction storm water general permit does not alone authorize the installation of such sanitary sewerage systems or potable water lines.*				
Does the SWP3 include measures for implementing good housekeeping practices?				
Does the SWP3 promote the use of protected storage areas for industrial or construction materials to minimize exposure of such materials to storm water?				

Part III.G.2.h - Maintenance				
	Y	**N**	**N/A**	**Comments**
The SWPPP describes adequate repair and maintenance procedures for each temporary and permanent control practice planned in order to ensure continued function.				
Part III.G.2.i - Inspections				
	Y	**N**	**N/A**	**Comments**
The SWP3 states that only "qualified inspection personnel" will perform the inspections?				
The SWP3 requires construction site inspections to be performed once every 7 calendar days; and after every rain event $\geq$ 0.5-inch in a 24-hour period by the end of next calendar day (excluding non-working weekends & holidays)?				
The SWP3 states that the inspection frequency may be reduced to monthly for dormant sites if:				
• the entire site is temporarily stabilized or				
• runoff is unlikely due to weather conditions for extended periods of time (e.g., frozen ground)?				
Does the SWP3 include an inspection checklist (to be completed and signed after every inspection) that includes: • the inspection date; • names, titles, and qualifications of inspectors;				

• weather for the period since the last inspection (e.g., beginning, duration, & rainfall amount of each storm event and whether a discharge occurred); • weather and a description of any discharges occurring at the time of the inspection; • location(s) of discharges of sediment or other pollutants from the site; • location(s) of BMPs that need to be maintained; • location(s) of BMPs that failed to operate as designed or proved inadequate for a particular location; • location(s) where additional BMPs are needed that did not exist at the time of inspection; • and corrective action required including any changes to the SWP3 necessary and implementation dates				
The SWP3 details the areas to inspect (disturbed areas; material storage areas; erosion and sediment controls; discharge locations; and vehicle entrance/exit locations)?				
Does the SWP3 state that inspection records will be kept for 3 years after termination of construction activities?				
Does the SWP3 specify the time within which BMPS must be repaired, maintained or a new functional BMP installed? (Within 3 days of inspection for non-sediment pond BMPs, and within 10 days of inspection for sediment ponds to be repaired or cleaned out and replacing a BMP not meeting the intended function or missing from the site.)				

Appendix E

CSECI Inspection Checklist

Real People. Real Possibilities:

DON SCHONHARDT, MAYOR

Public Service Department

City of Hilliard
Construction Sediment and Erosion Control Inspection Report

Date:	Time:	Inspection Type: Bi-Weekly ☐ Storm Event ☐
Project Location:		Inspection Performed By:

1.		Does the project site have a SWPPP on display?	Yes ☐ No ☐ N/A ☐
2.		Is NPDES authorization posted?	Yes ☐ No ☐ N/A ☐
3.		Is contractor/subcontractor signature on NOI current?	Yes ☐ No ☐ N/A ☐
4.		Does the SWPPP cover current construction activities?	Yes ☐ No ☐ N/A ☐
5.		Are structure controls installed and functioning as required by the SWPPP?	Yes ☐ No ☐ N/A ☐
6.	A.	Temporary stabilization in compliance as required by SWPPP?	Yes ☐ No ☐ N/A ☐
	B.	Permanent stabilization in compliance as required by SWPPP?	Yes ☐ No ☐ N/A ☐
7.		Are construction entrances properly maintained and streets abutting construction entrances clean?	Yes ☐ No ☐ N/A ☐
8.		Are stockpiles and borrow pits in compliance with the SWPPP?	Yes ☐ No ☐ N/A ☐
9.		Have non-sediment pollution controls been implemented such as: proper disposal of solid waste, hazardous materials storage, and concrete truck washouts?	Yes ☐ No ☐ N/A ☐
10.		Are de-watering activities in compliance with permit?	Yes ☐ No ☐ N/A ☐
11.		Are ditch checks installed and functioning as required by the SWPPP?	Yes ☐ No ☐ N/A ☐
12.		Have BMP's been removed that are no longer needed?	Yes ☐ No ☐ N/A ☐
13.		Have site deficiencies from prior inspections been corrected?	Yes ☐ No ☐ N/A ☐

Overall Site Rating:

In Compliance with SWPPP ☐ Requires Minor Corrections ☐
Requires Major Corrections ☐ Requires Storm Damage Repair ☐

Documentation: Digital Images ☐ Video Recording ☐ Site Plan ☐

***Refer to Violation Details on following page for list of non-compliance items.**

Inspector: _____ **Date:** _____

Project Engineer: _____ **Date:** _____

Contractor Representative: _____ **Date:** _____

Violation Details

Violation ID	Violation/Location	Date Reported	Latest Date to be Corrected	Date Enforce-ment Initiated

* Final Warning, any unaddressed items may result in enforcement actions taken by the City of Hilliard.

Comments

Appendix F

Construction Program Escalation Plan

City of Hilliard
Construction Site Erosion and Sediment Control
Escalation Plan

Construction site erosion and sediment control inspection and reporting procedures:

1. Conduct erosion and sediment control inspections on a monthly basis.
2. Prepare a report identifying the Best Management Practice (BMP) installation and maintenance needs per the City's approved Storm Water Pollution Prevention Plan (SWP3).
3. Submit a copy of the report to the project contact and indicate a timeframe when the required action items are to be addressed.
4. Inspect the BMP's during the next scheduled inspection to ensure the require actions items as identified within the previous report were properly addressed.
5. If properly addressed, document the corrective actions.
6. If not properly addressed, prepare and email a Notice of Violation (NOV) email seeking voluntary compliance within 10-days.
7. Conduct a follow-up NOV inspection after the 10-day period.
8. If properly addressed, document the corrective actions.
9. If not properly addressed, prepared and provide a formal NOV letter and identify potential enforcement proceedings.
10. Conduct a follow-up NOV inspection after the 10-day period.
11. If properly addressed, document the corrective actions.
12. If not properly addressed, seek enforcement per XXXX
13. On an annual basis, track the following and include within the annual SWMP report submitted to the Ohio EPA by April 1st of each year:
    a. Number of sites requiring erosion and sediment control inspections
    b. Number of inspections conducted
    c. Number of NOV letters submitted
    d. Number of enforcement cases

Notice of Violation Email Template

Subject: (Project Name) Erosion and Sediment Control Notice of Violation

A Storm Water Pollution Prevention Plan (SWPPP) for your project was approved by the City of Hilliard. The SWPPP identifies Best Management Practices (BMPs) that are to be installed and maintained throughout construction to manage stormwater runoff pursuant to XXXX and the Ohio EPA's NPDES General Permit. The SWP3 implementation was additionally reviewed during the project preconstruction meeting.

The City conducts monthly SWP3 observations to ensure that the SWP3is being properly implemented and resulting reports are submitted to your attention. A SWP3 observation was conducted on XX/XX/202X and BMP installation and/or maintenance needs were continued to be noted as indicated within the previous monthly SWP3 observation report.

At this time, the City is requesting compliance within 10-days of date of this email in addressing the following:

- Describe BMP installation/maintenance needs

Please reply all to this email with your intent to comply and again to confirm when action has been completed.

The City project inspector shall conduct a follow-up inspection to ensure this compliance request has been properly addressed.

If you should have questions or would like to further discuss this request, Please contact me at (614) XXX-XXXX or at email address.

Notice of Violation Letter Template

[Click **here** and type date]

[Click **here** and type Name]
[Click **here** and type Company Name]
[Click **here** and type Address]
[Click **here** and type Address]

Re: **[Click here and type Project Name]**
Construction Runoff Stormwater Management Notice of Violation
Immediate Action Required

Dear [Click **here** and type Name]:

Pursuant to the City of Hilliard City Code Chapter XXXX, [Click **here** and type Company Name] is hereby issued a Notice of Violation (NOV) for the illicit discharge of construction site discharges into the City's Municipal Separate Storm Sewer System (MS4).

[Click **here** and type Company Name] is required to properly implement and maintain the erosion and sediment controls as specified on the City approved Storm Water Pollution Prevention plan and must take immediate and on-going measures to properly manage the construction site runoff.

On[Click here and type Date] , [Click here and type City Staff Name] observed and photographed improperly managed construction site stormwater runoff into the City' MS4.

[Click here and type the NOV Description]

Please be advised that failure to comply with the requirements of this NOV will result in the City pursuing enforcement per City Code Chapter XXXX.

You are required to submit a response letter to the City within 10 days of receipt of this letter identifying actions that will be implemented, along with corresponding dates, to properly address the noted violations.

Response letter submittal address:

City of Hilliard
XXXX
Attention: XXXX
XXXX
XXXX
XXXX

If you should have questions regarding this NOV notification, Please contact me at (614) XXX-XXXX. The City will provide a follow-up site visit to ensure that the noted stormwater management violations have been properly addressed.

Sincerely,

XXXX
XXXX
XXXX

CC:

Appendix G

Post-Construction Inspection Program Escalation Plan

City of Hilliard
Post-Construction Site Erosion and Sediment Control
Escalation Plan

Post-construction water quality Best Management Practice inspection and reporting procedures:

1. On an annual basis, determine the number of projects with post-construction water quality Best Management Practices (BMP's) and Operation and Maintenance (O&M) plans approved, and O&M agreement established.
2. Update the City's MS4 map and identify the locations of the BMP's.
3. Per the date identified within the O&M agreement, confirm the number of annual inspection reports received from the post-construction operators.
4. Determine projects where annual reports were not received from the post-construction operator.
5. Prepare and submit an inspection reminder to the post-construction operator, reminding them of their report submittal requirement per the established O&M agreement. Provide a date of when the inspection is to occur by and report submittal requirements.
6. Track the report submittals. If a report was not received, the City shall prepare a Notice of Violation (NOV) letter and submit to the post-construction operator. The letter will indicate that the BMP shall be inspected within 30 days and a report submitted to the City.
7. Document reports received by the City.
8. If a report is not received by the timeframe indicated within the NOV letter, the City shall inspect the BMP, maintain the BMP as necessary, and charge such maintenance costs to the Owner per the established O&M agreement.
9. On an annual basis, track the following and include within the annual SWMP report submitted to the Ohio EPA by April 1st of each year:
    a. Number of sites requiring post-construction water quality BMP's
    b. Updates to the MS4 map – BMP location identification
    c. Number of O&M plans approved and agreements established
    d. Number of annual inspection reports received
    e. Number of inspection reminder letters submitted
    f. Number of enforcement cases

Notice of Violation Letter Template

[Click **here** and type date]

[Click **here** and type Name]
[Click **here** and type Title]
[Click **here** and type Company Name]
[Click **here** and type Address]
[Click **here** and type Address]

Re: [Click here and type Project Name]
Water Quality Best Management Practice Inspection Notice of Violation
Immediate Action Required

Dear [Click **here** and type Name]:

As part of the overall facility/site engineering plan submittal and review process, an Operation and Maintenance (O&M) Plan was approved by the City of Hilliard. The O&M plan identifies the post-construction water quality Best Management Practices (BMPs) constructed as part of the overall facility/site improvements. These BMPs provide post-construction stormwater runoff water quality treatment. To ensure that the BMPs are properly functioning, they are required to be routinely inspected and maintained. BMP inspection and maintenance procedures are identified within the O&M plan.

As part of the O&M plan approval process, an O&M agreement was established with the City of Hilliard and recorded at the Franklin County Recorder's Office. Pursuant with the agreement, the facility/site owner shall ensure that all BMPs identified within the O&M plan are inspected at least once per year. Resulting from the inspections, reports are to be completed and include the following information at a minimum:

- Project name and address;
- Inspection date;
- Indicate the BMPs inspected and identify the inspected components;
- Summary of inspection results including necessary repairs and maintenance; and
- BMP pictures taken during the time of the inspection.

Copies of the inspection reports and maintenance and repair records are to be submitted to the City of Hilliard by June 30th on an annual basis per the above referenced agreement.

As of the date of this notification letter, copies of the inspection reports and maintenance and repair records have not been submitted to the City of Hilliard. By receipt of this letter, The City of Hilliard is requesting the required inspection reports to be submitted within 30-days.

Inspection reports to be submitted to:

City of Hilliard
XXXX
Attention: XXXX
XXXX
XXXX
XXXX

Please be advised that failure to comply with the requirements of this notification will result in a violation of the established O&M agreement.

If you should have questions regarding this notification, Please contact me at (614) XXX-XXXX.

Sincerely,

XXXX
XXXX
City of Hilliard

Appendix H

SWMP Modification Log

SWMP Modifications

Date	MCM	Modification Description