## The City of Reynoldsburg, Ohio Storm Water Management Program

NPDES Phase II Permit to Discharge Storm Water Phase II, Cycle 3 (9/11/2014) and Later

## Chapter I Introduction and Background

#### **Summary**

In 2003, the City of Reynoldsburg was required to prepare a Storm Water Management Program (SWMP) to protect water quality, and to satisfy the requirements of the Clean Water Act (CWA) in accordance with the Ohio EPA Phase II program and with 40 CFR Part 122.32 and Ohio Law. The first SWMP was prepared as part of the City's application for initial coverage under the Phase II Ohio EPA Permit.

A variance to the original SWMP was requested in the 2006 Annual Report to the Ohio EPA. The original SWMP proposed performing "dry weather" screening of all of the MS4 outfalls every three months for one year. It was determined that this plan would be impractical due to the large number of man hours required and the relative scarcity of days that were sufficiently dry (more than 72 hours without rainfall prior to evaluation of each outfall). The new proposed plan called for screening each outfall once per permit cycle for the first three permit cycles.

Ohio EPA Permit # 4GQ10002\*DG Includes a requirement for the City to prepare and submit to the Ohio EPA a new SWMP. Revision of the original SWMP is needed to reflect changes in the Ohio EPA General Permit to Discharge Stormwater since 2003. There have been changes in the City's MS4 as well, which require some revisions to the City's program.

This document outlines the City of Reynoldsburg's plan to revise, refine and update the original SWMP and its subsequent variance. A signed copy of this new SWMP must be submitted to the Ohio EPA by November 4, 2016.

#### **Legal Authority**

The City of Reynoldsburg Ordinance No. 4-03 (see attachment "A") identifies the Mayor of Reynoldsburg as the signatory authority for the City for the NPDES Phase II program. The City of Reynoldsburg has both the fiscal resources and legal authority to fully implement its storm water management program.

#### Permit Coverage area

This SWMP applies to all areas within the incorporated City limits. The City of Reynoldsburg had a population of 32,286 in the year 2000 based on the U.S. Census Bureau. The population had increased to 35,893 by the 2010 U.S. Census.

The City of Reynoldsburg is primarily a residential community. There are commercial areas along Broad St., Main St., near the interchange of Brice Rd. and Interstate 70 and near the interchange between State Rte. #256 and Interstate 70. There are no large scale manufacturers or other heavy industries within the city limits. The largest private employer in the City is the Limited Corporation which operates a large warehouse and office campus, on the northeast side of the city.

The City's MS4 discharges to several waterways in two basins of the Big Walnut Creek watershed. The Blacklick Creek receives storm water from most of the City. The extreme western portion of the City discharges into the Big Walnut Creek basin. The individual waterways are listed below:

Streams in the Blacklick Creek Watershed in the City of Reynoldsburg:

Blacklick Creek

**Dysart Ditch** 

French Run Creek – Divided into two branches the North (or west) and the East (or south).

North Unnamed Tributary to Blacklick Creek

South Unnamed Tributary to Blacklick Creek

Unnamed Tributary to Powell Ditch (tributary flows towards the Southwest, out of the City)

Streams in the Big Walnut Creek watershed (but not part of the Blacklick Creek watershed) in the City include:

Martin Grove Ditch Unnamed tributaries to Big Walnut Creek

#### **Reporting Requirements**

The City of Reynoldsburg will submit its report annually, on April 1 of each year, using the <u>Annual Reporting Form</u> provided for the "NPDES Small MS4 General Permit, (OHQ000003 or its sequels).

#### **History**

The City originally created a Storm Water Maintenance Utility within the Street Dept. in February 1993. An Ordinance entitled <u>Storm Water Charges</u> (Chapter 958) was enacted in February 1996 Funds generated by this Ordinance were earmarked as follows:

"Monies collected from the Utility Service Charges are to be utilized solely for the operations, maintenance, repair, improvement and extension of the Utility; to provide for the safe and efficient capture and conveyance of stormwater; to mitigate the damaging effects of stormwater runoff and the correction of stormwater problems; to fund activities of stormwater management, including but not limited to, design, planning, regulation, education, inspection, and activities, all for the protection of the public health, welfare, and safety."

A Stormwater Service Fee Crediting Mechanism (Chapter 959 of the City Code) was passed in March 1996 and revised in June 2008. The ordinance allows non-residential customers to reduce their storm water fee by providing the maintenance on retention or detention facilities or open storm water channels. The amount of credit is calculated based on the treatment performance / capacity of the basin. The credit for open channel maintenance is based on the linear feet of channel being maintained.

On March 19, 2003 the City of Reynoldsburg was issued a Permit to Discharge Storm Water # 4GQ10002\*AG (hereinafter called the "first Permit"). With the advent of the Phase 2 NPDES Permit it was decided to incorporate all parts of the program into the existing Storm Water Utility, with the assignment of additional personnel as needed.

The first requirement, set forth in the first Permit, for the City is "You must develop, implement, and enforce an SWMP designed to reduce the discharge of pollutants ..." As part of the preparation of the Notice of Intent (NOI) completed in 2003 a SWMP was created for the City by EMH&T. That document has been used as the primary tool for directing the activities of the City in fulfilling the requirements of the NPDES Permit.

## Chapter II

## **The Existing Stream Conditions and Impairment Sources**

The overall goal of the program is to reduce pollutants that are degrading the streams sufficiently to impair their suitability for "beneficial use" as determined by the Ohio EPA. If a Surface Water of the State is found to be unacceptable in some criteria, the EPA determines how much of the pollutant (or other impairment) in question can be assimilated by the receiving water. That Total Maximum Daily Load (TMDL), once calculated, is apportioned among the known sources of the pollutant and an acceptable limit of discharge for each source is determined.

#### The TMDLs (2005 Assessment) and nature of the Streams in the City

#### The severity level of each impairment is rated as:

H = High magnitude

M = Medium magnitude

S = Slight Magnitude

**Blacklick Creek** HUC 140-050 enters Reynoldsburg on the north side east of Rosehill Rd. and proceeds through town in a generally south-southeasterly course. No natural, significant waterways enter the stream from the west side. The majority of the city that lies to the west of the creek drains into the creek via numerous MS4 outfalls. The creek exits the city on the south side, at I-70 west of Rte. # 256. There is very little area left for new development along the banks of the Blacklick Creek.

Impairments for all sections of Blacklick Creek in the City and all sections upstream from the City are listed as: Ammonia = H, Nutrients = H, Pathogens = H, Organic Enrichment = H, Siltation = M, and Priority Organics = M.

**Dysart Run** aka (Dysar Run) (Dysart Ditch) joins Blacklick Creek, at R.M. 14.64, enters Reynoldsburg from the north at Broad St, west of Waggoner Rd. The majority (>80%) of the Dysart watershed lies within the City of Columbus. Most of the stream basin within the City is fully developed residential neighborhoods. The remaining development along the stream near Broad St. is expected to be commercial properties. Dysart Run enters Blacklick Creek near the north end of Promise Ct.

Impairments for all sections of lower Dysart Run in the City and all sections upstream from the City are Siltation = H (upstream development), Pathogens = S (failing HSTS), Metals=S (upstream industry), Priority Organics = S (upstream industry), Organic Enrichment = S (upstream agriculture?), and Habitat Alteration = S.

**French Run North Branch** aka (French Run West) Ends at French Run R. M. 0.33, originates in the northeast area of the city. This basin drains several areas of current and probable future development. French Run North Branch joins French Run south of French Run Elementary School.

Impairments for this branch are "Unknown" causes = H, and pathogens = M (failing HSTS).

**French Run** (including French Run East) enters Reynoldsburg on the extreme northeast side of the city at Summit Rd, north of Firstgate Dr. This stream basin drains several currently residential developments under construction. Two multi-acre parcels have been recently annexed by the city partly for additional residential development.

Impairments for the east (main) branch of French Run are from siltation = H (residential and commercial development), and pathogens = M (failing HSTS).

**North Unnamed Tributary** (**NUT**) joins Blacklick Creek at R. M. 12.89. It drains the fourth largest basin in the city. This is an active basin for development of residential and commercial projects. There is also potential for future development as the basin drains the area around the Livingston Ave. - Rte. #256 area and the Taylor Rd. - Main St. area. NUT joins Blacklick Creek just north of Blacklick Metro Park.

The North Unnamed Tributary is not listed in the 2005 TMDL Report.

**South Unnamed Tributary aka (Lee's Creek)\*** (**SUT**) joins Blacklick Creek at R. M. 11.25. It drains the area south of Slate Ridge Blvd. extending generally to the I-70 right of way. Most of this area consists of commercial developments and high density residential properties. There are a few active developments still being constructed in the basin and there is potential for more development on the east side through annexation. SUT joins Blacklick Creek just north of I-70 and west of Rte. #256.

There are no impairments listed for the South Unnamed Tributary.

Lee's Creek\* joins Blacklick Creek at R. M. 10.36 drains only a miniscule portion of the city. It enters and leaves the city limits on the south side of the Dept. of Agriculture facility and barely re-enters the city limits behind the condominiums on the south side of Taylor Rd. Southwest before exiting again after a few hundred yards. This stream joins Blacklick Creek south of the city limits approximately 0.9 river miles below the confluence of SUT with Blacklick Creek.

\* **Note**: The tributary at R.M. 11.25 is designated as Lee's Creek in the 2005 TMDL Report. In an August 2009 article (about the Ohio EPA fining the City of Pickerington for work in Lee's Creek) in the Columbus Dispatch, Lee's Creek was stated to be south of Interstate 70. Therefore the 2005 report nomenclature has been adjusted in this report.

There are no impairments listed for Lee's Creek.

Martin's Grove Ditch and Misc. Tributaries to Big Walnut Creek. Martin's Grove Ditch, along with a few small streams, drains the extreme western portions of Reynoldsburg. These all are headwaters and drain areas that are primarily residential. These streams drain to Big Walnut Creek and will be studied as one basin.

The water quality attainment status of these streams is not given in the Ohio EPA TSD report. Since all sections of Big Walnut Creek near and downstream from the

confluence were in "Full" attainment status, Martin's Grove will be tentatively assigned a status of "Full" compliance unless contradictory data becomes available.

There are no impairments listed for these tributaries.

**Misc. Tributaries of Powell Ditch:** A small portion of the Southwest corner of the City drains (due south) to an unnamed tributary of Powell Ditch or southwest directly to Powell Ditch (a north to south flowing tributary of Blacklick Creek located west of the City).

The primary impairment for Powell Ditch is listed, in the TMDL Report, as "habitat modification due to direct alteration of the channel and the source is attributed to land development and urban runoff,"

## Water Quality Attainment Status of each stream in the City as taken from the <u>Biological Quality Report</u>

French Run North	(NON)	
Dysart Run	(NON)	
French Run	(Partial)	
Blacklick Creek	(Full)	
NUT	(Full)	
Lee's Creek	(Full)	
SUT	(Full)	
Martin's Grove Ditch (Full)		

# Chapter III The Storm Water Management Program

#### Goals

This program will address the third and subsequent cycles of the Ohio EPA Phase II program. Since the inception of Phase II of the NPDES storm water program, specific Total Maximum Daily Load (TMDL) values have been established for the watersheds that are partially located in the City of Reynoldsburg. The principle areas of concern identified are excess nutrients, pathogens and suspended solids (siltation). The identification of these areas of concern will enable a tighter focus on solving the water quality challenges in the City.

#### **Methods**

The program will consist of six Minimum Control Measures (MCMs). These measures are:

- 1) Public Education/Outreach
- 2) Public Participation/Involvement
- 3) Illicit Discharge Detection/ Elimination
- 4) Construction Site Runoff Control
- 5) Post Construction Runoff Control
- 6) Pollution Prevention/Good Housekeeping

The main impairments to stream quality that originate within the City and can be influenced by the City are:

- 1. Siltation resulting from construction activities and material on streets.
- 2. Excess pathogens resulting from pet waste and failing HSTS's
- 3. Habitat Alteration resulting primarily from siltation and hydrologic overloading of streams causing bank erosion and down-cutting.

The City will reduce siltation by first reducing runoff from construction sites and secondly pursuing a street sweeping program, to reduce dust and leaves from road surfaces. The public will receive educational materials designed to reduce littering and the disposal of yard waste in the streets/curbs.

The City will attempt to reduce the load of pathogens by maintaining an agreement with the Franklin County Board of Health to inspect all HSTS's in the City. The City will maintain a program to detect illicit discharges from municipal outfalls. The City will also educate the public on HSTS maintenance and pet waste disposal.

The City will reduce habitat alteration by requiring peak-volume flow control on all new construction or redevelopment of commercial and industrial sites. The City will encourage the use of conservation buffers along waterways and green infrastructure e.g. bioretention facilities, to reduce total flow.

Specific BMPs to comply with Ohio EPA Permit conditions and achieve the goals outlined above are described below:

#### MCM #1: Public Education

It was recognized early in the program that public awareness of storm water problems would be important to the implementation of the program. The public could prove especially helpful when operating as supplemental eyes and ears for the City. Conversely an apathetic, or worse, an antagonistic public could hamper or sabotage City efforts. It was also recognized early in the program that the City did not have the

expertise necessary to fully implement this MCM, by itself. Therefore options involving the aid of other agencies and private consultants would be sought.

The City will tailor efforts to reach several target audiences:

- 1. Landowners because they may have the ability to directly increase or reduce pollution entering streams. Their use of conservation practices and reducing their use of chemicals can have a large impact on water quality.
- 2. Students because they will probably have a large long-term impact on future environmental policies and practices.
- 3. Commercial and industrial business owners because of their potential to generate pollution e.g. litter, grease, automotive fluids and etc.
- 4. Owners of HSTS's due to the need to continuously monitor the operation of their systems.
- 5. Developers to prevent excessive erosion, soil transport, or chemical pollution
- 6. Residents in general to encourage public support for the program and environmental concerns.

To evaluate the success of this suite of BMP's, 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 on 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.

Several BMPs were selected as likely to be achievable and collectively effective practices.

A. <u>BMP</u>: Provide educational exposure and materials to at least 50% of the students in the City of Reynoldsburg school system. This will be achieved by support to the public school system and thru contracts with other agencies.

<u>Measurable Goal</u>: Provide educational contact with at least 50% of the students by the end of each five year permit cycle

**TMDLs Addressed:** Nutrients, Pathogens and Siltation.

<u>Schedule:</u> Each year of the permit. The primary concentration will be during the school year

<u>Responsible Party</u>: Franklin Soil and Water Conservation District. See Attached Copy of Annual Contract. (Attachment B)

**<u>Discussion:</u>** This battle (and the future of this Program) will be won or lost in the hearts and minds of the youth of today. They are less set in their ways and are therefore generally more amenable to changes in thought, attitude and belief

systems. They are frequently more likely to be interested in the natural world around them and are often looking for ways to invest their energy. Finally they are often looking for ways to differentiate themselves from their perception of the attitudes and values of their parents' generation. This is often manifested in a concern for social issues. Environmentalism has been a popular issue with various youth groups.

This BMP, as proposed, called for the exposure of 50% of the student body to educational materials and presentations concerning storm water pollution, by the end of the first Permit cycle. The City plans to continue the program with the same level of exposure each permit cycle as the minimum goal.

The City has apparently not enjoyed a particularly effective relationship with the city schools, in the past. In light of this handicap and the City's lack of expertise, it was decided to use a third party agency to pursue the proposed goal. The agency selected was the Franklin Soil and Water Conservation District.

A variety of contact and education techniques was selected to achieve the desired goal. Some direct presentations have been given. The potentially most effective long-term methodologies have involved providing training and educational materials to the teachers and school libraries. These efforts are expected to have a residual effect spanning multiple classes over multiple years.

B. <u>BMP</u> Develop and maintain a link or links on the City's website that will provide storm water pollution control information to the general public and allow for public input of ideas and complaints. Also applicable to: MCM#2, MCM #3 and MCM #4

TMDLs Addressed: Nutrients, Pathogens and Siltation.

<u>Measurable Goal</u>: Maintain an internet presence containing information about related events and City rules affecting storm water pollution control.

<u>Schedule:</u> Continuously each year of the Permit.

<u>Responsible Party</u>: The City's website is maintained by the City Computer Systems office: (Scott Teeters) (614)322-6883.

**<u>Discussion:</u>** In an era of increasing electronic communication, the City felt that it was desirable to implement an internet based communication pipeline. It was envisioned that such a pipeline could enable two aspects of communication with the public:

- 1) As an information source: The City placed some information on the website very early in the process of establishing this program. Additional information and links have been added as they were developed.
- 2) As a means of receiving input from citizens: A link permitting email input from concerned citizens was also added. A program allowing citizens to communicate concerns on any aspect of City governance has been added subsequently and receipt of comments on the storm water program was added to this program. The original link was also retained to provide increased opportunities for public contact.
- C. <u>BMP</u>: In conjunction with the Franklin County (and Fairfield and Licking Counties if applicable) Board of Health, Identify owners of Home Sewage Treatment Systems (HSTSs. Contact and educate them about the proper methods of operation and maintenance. Also applicable to MCM#3

<u>Measurable Goal</u>: Contact or mail informational material to each owner of an HSTS, in the City, at least once per permit cycle

**TMDLs Addressed**: Nutrients and Pathogens.

<u>Schedule</u>: At least one contact will be made or mailer will be sent per permit cycle.

<u>Responsible Party</u>: The City of Reynoldsburg Storm water Utility: (Delmar Perry), phone #(614)322-5800

**<u>Discussion:</u>** A list of 36 properties with HSTS's was prepared, by an engineering firm, and submitted with the original NOI. It was impossible, several years later, to determine the methodology or criteria used to generate the list.

During the first permit cycle the locations of all HSTS's in the City were determined. Records obtained from the Franklin County Board of Health and billing data from the City water and sewer Dept. were compared to generate a new list.

All HSTS's in the City are monitored by the Franklin County Board of Health. The City will also monitor the roadside drainage ways and any outfalls near the identified properties for evidence of malfunctioning units.

D. <u>BMP:</u> Develop and/ or distribute informational handouts and brochures

<u>TMDLs Addressed:</u> Nutrients, Pathogens and Siltation.

<u>Measurable Goal:</u> Maintain pamphlets on the display rack at the City Building. Distribute materials during face-to-face meetings with targeted individuals.

<u>Schedule:</u> The pamphlets were developed in 2003. They will be reviewed and, if needed, revised in the first two years of the third permit cycle.

<u>Responsible Party</u>: The City of Reynoldsburg Storm Water Utility (Delmar Perry), phone # (614)322-5800

<u>Discussion:</u> The electronic communication program outlined in item "B" of this chapter, clearly would not serve as the only means of informing the public. First it obviously excludes all individuals who (for whatever social or financial reasons) do not have ready access to the internet. Secondly it requires that the targets actively seek out that information and therefore is likely to be most effective as a source of secondary educational information after initial awareness is achieved.

The Superintendent of the Street Department, in 2002, launched this portion of the program, prior to the hiring of additional dedicated personnel in the Storm Water Utility. Informational brochures were prepared by utilizing some freely available government designed informational brochures. These brochures were distributed to local leaders and placed in a prominent public location at the City administration building. The currently available brochures will be updated or replaced. They will then be continuously available at a display stand in the lobby of the Municipal Building.

Targeted handouts have since been developed. These include one directed at restaurants, one for automotive services, and one for construction site contractors and developers. The business oriented brochures will be distributed to all of the known businesses of the targeted types. The handout pertaining to erosion, sediment, and pollution control during construction is distributed during the mandatory pre-construction meetings

E. <u>BMP:</u> Advertise community cleanup days.

Measurable Goal: Create public awareness of the event.

Schedule: Annually

<u>Responsible Party</u>: City of Reynoldsburg Service Department (322-6810)

**<u>Discussion:</u>** Information is provided on the City's website and through local publications and pamphlets.

Also applicable to MCM #2

F. <u>BMP:</u> Publish at least one article annually in a publication available in the City.

<u>Measurable Goal:</u> Provide exposure to over 50% of the City's population, by inclusion of the information in a periodical of very broad appeal.

The City will address at least five themes during each permit cycle. Proposed themes include:

- 1. City owned structural BMPs
- 2. Pollution Prevention: Nutrient control in runoff
- 3. Pollution Prevention: Automotive maintenance wastes and disposal methods
- 4. Conservation, recycling, and reuse
- 5. Public monitoring of construction sites

The City may modify or change themes to reflect new trends and attempt to achieve synergistic effects resulting from developments in the news media.

<u>TMDLs Addressed:</u> Nutrients, Pathogens and Siltation (depending on the theme).

Schedule: At least once per year.

<u>Responsible Party</u>: Publication by the Parks and Recreation Department, Content by the Storm Water Utility (Delmar Perry 322-5800)

<u>Discussion:</u> Articles will be written about pollution prevention and activities that citizens can participate in to reduce the human impact on the environment. Future articles will be written on a variety of storm water related themes. The articles are published in the City's Parks and Recreation Department's biannual magazine. The magazine is designed to appeal to all age groups and virtually all socioeconomic groups.

This avenue is believed to be particularly likely to be effective since one could reasonably surmise that people who routinely enjoy the City's parks might also be more interested in maintaining a cleaner and healthier environment for themselves and others.

### MCM#2: Public Participation and Involvement

Public involvement is obviously the most challenging of the Minimum Control Measures to develop. It is not legal after all to just require that people show up and perform such activities in large numbers. The City selected several BMP's designed to make it easier for citizens to become more involved in the process of cleaning up the environment and preventing pollution from entering waterways.

The City has worked cooperatively with other agencies such as the Solid Waste Authority of Central Ohio in support of already existing programs that would help to

reduce the potential litter/trash dumping waste stream. If appropriate programs become available again the City will pursue similar opportunities again.

The success of this MCM will be evaluated by reviewing the number of people participating annually in the public events. The City will track and review water quality related concerns and complaints received by the City. Additional events may be added or modified based on the annual review, to target specific stormwater themes or audiences

A. <u>BMP:</u> Maintain a website to allow citizen input of information about local waterways and storm sewer systems. Also applies to MCM #3 and MCM #4

<u>Measurable Goal:</u> Maintain an internet presence allowing for citizen input about issues, questions, or concerns related to storm water pollution.

<u>TMDLs Addressed:</u> Nutrients, Pathogens and Siltation.

Schedule: This will be continuously available.

<u>Responsible Party</u>: The City's website is maintained by the City Computer Systems office: (Scott Teeters) (614)322-6883.

**<u>Discussion:</u>** This process was initiated during the first year of the first permit cycle and will be continued indefinitely.

B. <u>BMP:</u> Identify annual event (e.g. community clean-up) for City of Reynoldsburg participation. Assist in administration and organization. Continue event on an annual basis. Track the number of residents participating.

TMDLs Addressed: Nutrients and Siltation.

<u>Measurable Goal:</u> Conduct a public involvement event on an annual basis. Track the number of residents participating.

<u>Schedule:</u> The event is usually scheduled for early June and is planned for each year of the permit.

<u>Responsible Party</u>: The City of Reynoldsburg Storm Water Utility: (Delmar Perry), phone # (614)322-5800

<u>Discussion:</u> The City organizes and runs at least one community cleanup event each year. This is a week dedicated to generally cleaning up the city. This was held in conjunction with the household hazardous waste collection day (when that service was available). The event was jointly sponsored by the City and the Solid Waste Authority of Central Ohio (SWACO). The City arranges support services

for this event, including organizing volunteer help and providing a location and dumpsters for public disposal of bulk trash items and litter. Additional collateral support is provided by scheduling concurrent recycling events.

If SWACO resumes household hazardous waste collection days, the City will attempt to coordinate the two events.

C. <u>BMP</u>: Maintain a system to record contacts from citizens (via any means) and track the investigation and resolution of the citizens' concerns and comments, pertaining to storm water. Also applicable to MCM#3, MCM #4, MCM #5, and MCM#6.

**TMDLs Addressed:** Nutrients, Pathogens and Siltation.

<u>Measurable Goal:</u> Maintain a record of public involvement in pollution prevention and reduction activities.

<u>Schedule:</u> The program will be continuously maintained and used as required by citizen participation.

<u>Responsible Party</u>: The City of Reynoldsburg Storm Water Utility (Delmar Perry), phone # (614)322-5800

**Discussion:** The City currently uses a paper work order system to record and track the citizen response, Due to the small number of contacts (usually less than 200 per year), the capacity of the paper system has been acceptable. A new system of receiving and tracking service requests from citizens thru the City's website is being evaluated.

### MCM#3: Illicit Discharge Detection and Elimination

The City of Reynoldsburg is essentially a bedroom community/suburb of the City of Columbus. There are no large scale manufacturing facilities within the Reynoldsburg city limits. The largest commercial facility within the City is a clothing warehouse complex. There are numerous service industry and retail businesses in the City.

Most of the commercial and residential development in the City has occurred in the last 30 years. As a result of this delayed development, there are only a handful of businesses and residences that were built prior to the development of modern plumbing, sanitation and storm water codes. Few houses have a home sewage treatment system (H STS), most are connected to the sanitary sewer system. These conditions limit the likelihood of large scale and persistent illicit discharges resulting from illegal cross connections or deliberate discharges. All HSTS's in the City are routinely inspected by the Franklin County Board of Health

The City will continue to pursue end-of-pipe inspection efforts to attempt to detect illicit discharges. The principle procedure used for this BMP will be dry-weather screening of known outfalls. Some basic testing of any effluents detected will be performed along with physical tracing of flows.

The City anticipates that a program designed to encourage prevention at-the-source will be the most effective BMP for the business community. The prevention program will consist of two primary elements. The first element will be an evaluation of the risks through personal inspection of the property and consideration of factors relating to the age of the building, the nature of the business, and the infrastructure of the neighborhood. The second element will consist of establishing a line of communications with the operators of the businesses and providing educational materials to them. Franklin Soil and Water Conservation District has initiated a program of direct mailings to affected businesses. City personnel will develop and conduct a program of visual evaluation of high risk businesses.

The City will review the results of the dry weather outfall screening program and compare the results with the results of previous dry weather screening campaigns. The overall results will be used to identify areas of particular concern. The results will also be used to evaluate whether changes in public education programs may be needed to target specific audiences or pollutants.

Several BMPs were selected as likely to be achievable and effective practices. Each of the BMPs selected for this MCM will be discussed below.

A. BMP: Add known storm water systems in the area to the City GIS and Atlases.

<u>Measurable Goal:</u> Maintain accurate maps and GIS layers indicating the location of storm water systems in the City.

<u>Schedule:</u> The engineering firm (EMH&T) designed the GIS prior to the first cycle of the permit. The City has a contract with them to perform annual updates to the GIS.

<u>Responsible Party</u>: The City of Reynoldsburg Storm Water Utility: (Delmar Perry), (614)322-5800

**<u>Discussion:</u>** The City had the GIS system updated by the engineering firm that manages the GIS system. Additionally a large scale physical atlas was prepared to facilitate the dry-weather outfall screening project and to permit easier tracing of the source of any potential illicit discharges detected.

B. <u>BMP:</u> Conduct dry-weather screening of outfalls for flows and illicit discharges.

<u>TMDLs Addressed:</u> Nutrients and Pathogens.

<u>Measurable Goal:</u> Inspect approximately 20 % of known outfalls each year. The ultimate goal is to establish a list of high priority outfalls for more frequent surveillance.

<u>Schedule</u>: The City proposes to screen all outfalls (as weather permits) at least once per permit cycle for the first three cycles. Data collected each cycle shall be evaluated and priorities and goals shall be revised based on this evaluation.

<u>Responsible Party</u>: The City of Reynoldsburg Storm Water Utility (Delmar Perry), phone # (614)322-5800

**Discussion:** The City used the services of the Franklin Soil and Water Conservation District to perform the initial survey and mapping of outfalls in approximately 65% of the City while City crews surveyed the remainder of the City. The City will continue to survey outfalls and identify outfalls of particular concern. The City will then prepare a list of outfalls that present a risk of contamination from HSTS or commercial activities. The identified outfalls will then be subject to more frequent screening.

The second survey of the system outfalls has been completed in the second Permit Cycle. Testing of outfalls and tracing sources will be an area of concentration during the third Permit Cycle.

Information obtained from the three cycles of screening will be used to develop a list of outfalls that are at risk of chronic or major illicit discharges. These will be designated as high priority outfalls and subject to more frequent and thorough surveillance.

C. <u>BMP:</u> Review and Update (if needed) the Ordinance (Chapter 960.03- see attachment A) prohibiting Illicit Discharges into the City's MS4.

<u>TMDLs Addressed:</u> Nutrients, Pathogens and Siltation.

<u>Measurable Goal:</u> Maintain an Ordinance which complies with Ohio EPA requirements and reflects any additional needs of the City.

<u>Schedule:</u> The chapter will be reviewed annually and updated as needed.

<u>Responsible Party</u>: The City of Reynoldsburg Storm Water Utility (Delmar Perry), phone #(614)322-5800

**Discussion:** A definition of an Illicit Discharge and prohibition against introducing any illicit material into a storm sewer was incorporated into the City Code in chapter 960.03, as part of the codes establishing the City's program to

comply with phase II rules. This chapter will be reviewed as part of the preparation of the annual report to the Ohio EPA.

D. <u>BMP:</u> Train City inspectors and street maintenance personnel on illicit discharge identification and detection.

TMDLs Addressed: Nutrients, Pathogens and Siltation.

<u>Measurable Goal:</u> Provide educational training to City employees, through available government programs and vendor training.

<u>Schedule:</u> At a minimum the City will annually provide a formal training session to employees, who are likely to observe illicit discharge or dumping activities.

<u>Responsible Party</u>: Franklin Soil and Water Conservation District. See Attached Copy of Annual Contract. (Attachment B) and the City Storm Water Utility (Delmar Perry), (614)322-5800.

**Discussion:** The City has conducted training sessions designed to train City workers in identification and reporting procedures for illicit discharges. In addition to the personnel listed above City Parks and Recreation Dept. workers have been actively involved in the training sessions.

#### MCM# 4: Construction Site Runoff Control

The City of Reynoldsburg was originally designated as being in a "rapidly developing watershed". The effect of that designation was that the City was required to establish the programs outlined in MCM #4 and MCM #5 within the first three years of the date of issuance of the first phase II NPDES Permit. The City concentrated on developing a program of site inspections concurrently with an effort to educate developers, contractors, and engineering firms about the Permit requirements.

To evaluate the success of this MCM the City will track the number of inspections conducted and the frequency of violations noted. The program can be modified based upon the results of the inspections and determine if additional education mechanisms or enforcement procedures are needed.

Several BMPs were selected as likely to be achievable and effective goals. Some lessons learned during the implementation of this Program and proposed changes for the next Permit cycle may also be discussed.

A. <u>BMP:</u> Site Plan Review by the City Engineer and City storm water utility employees

TMDL Addressed: Siltation.

<u>Measurable Goal:</u> Review all plans to assure compliance with EPA and City storm water control requirements and to minimize the environmental impact of new development or redevelopment projects.

Schedule: Ongoing, as needed

Responsible Party: the City Engineer and City storm water utility employees

<u>Discussion:</u> All plans for projects that will disturb one acre or more of soil are reviewed by the City Engineer, except Plans that were prepared by the firm acting as the "City Engineer", are reviewed by an alternate City retained engineering firm. All plans for projects, that will require an NPDES Permit, are also reviewed by personnel of the City Storm Water Utility All concerns must be addressed prior to plan approvals.

B. <u>BMP:</u> Inspect construction sites to verify compliance.

TMDL Addressed: Siltation.

<u>Measurable Goal:</u> Show a trend toward a lower percentage of sites out-of-compliance.

Schedule: As needed, with at least monthly inspection of all eligible sites.

<u>Responsible Party</u>: The City of Reynoldsburg Storm Water Utility (Delmar Perry), (614)322-5800

**Discussion:** The City currently inspects all sites that are covered under NPDES phase II regulations. Each eligible site is inspected frequently, usually every 1-2 weeks. Results of inspections are reviewed to assure general compliance with current Ohio EPA and City standards.

C. <u>BMP:</u> Maintain an erosion control ordinance or ordinances that set standards for storm water pollution control on construction sites and provide enforcement tools (see attachments A & C)

TMDL Addressed: Siltation.

<u>Measurable Goal:</u> Maintain an Ordinance that complies with Ohio EPA requirements.

Schedule: Ordinance will be reviewed annually for continued suitability.

<u>Responsible Party</u>: The City of Reynoldsburg Storm Water Utility (Delmar Perry), phone #(614)322-5800

<u>Discussion:</u> Chapters 960 and 1127 of the <u>Codified Ordinances of the City of Reynoldsburg</u> were amended to reflect the requirements of the NPDES Permit. The ordinances are reviewed annually during the preparation of the annual report to the Ohio EPA.

D. <u>BMP:</u> Provide development communities with erosion and sediment control ordinance and requirements

TMDL Addressed: Siltation.

<u>Measurable Goal:</u> Assure that all developers are made aware of their responsibility to control the environmental impact of their development projects.

**Schedule:** Ongoing and as needed

<u>Responsible Party</u>: The City's website is maintained by the City Computer Systems office: (Scott Teeters) (614)322-6883. The informational content of the site is generated and approved by the Service Dept. (Bill Sampson) (614)322-6810 or its subsidiary Departments.

**Discussion:** The Storm Water Design Manual sets forth standards which are readily available to the development community both through City offices and on the City's website. In addition at each preconstruction meeting a summary of the standards for pollution prevention and erosion and sediment control at construction sites is provided to the Operator of the site.

Franklin Soil and Water Conservation District (thru an intergovernmental agreement) will be promoting the City of Reynoldsburg's involvement in enforcing the current standards for erosion and sediment controls on construction sites.

E. BMP: Train City inspectors to be able to identify erosion and run-off problems.

TMDL Addressed: Siltation.

<u>Measurable Goal:</u> To increase the number of trained observers monitoring the conditions around construction sites in the City.

<u>Schedule:</u> Inspectors receive comprehensive training prior to their first solo inspection. Additional instruction is provided at the annual training session described in MCM#6. Consultation with the storm water utility staff is available to all City workers at any time.

<u>Responsible Party</u>: Franklin Soil and Water Conservation District. See Attached Copy of Annual Contract. (Attachment B)

**<u>Discussion:</u>** The City inspectors and other City employees have and will receive annual training sessions which often include examples of storm water run-off problems and other things to watch out for at construction sites. The City also sends employees to seminars and meetings / expositions such as the Central Ohio Erosion Control Expo.

F. <u>BMP</u>: Require that the contractor and developer of each project attend a mandatory Pre-construction meeting prior to the start of each project or major phase of a multi-phase development.

**TMDL addressed: Siltation** 

<u>Measurable goal</u>: Assure that all developers are made aware of their responsibility to control the environmental impact of their development project and reduce the number of erosion and sediment control violations

<u>Schedule:</u> As needed for each project, prior to the start of construction

<u>Responsible party:</u> The City of Reynoldsburg Service Department (Bill Sampson), phone #(614)-322-6810

<u>Discussion:</u> A pre-construction meeting provides the last and best opportunity for the City to emphasize the project specific concerns about site conditions and sediment and erosion controls. A brief written summary of the standards required at the site is given to the contractor or developer at each pre-con meeting.

## MCM#5: Post-Construction Storm Water Management in New Development and Redevelopment

The City was required by its first NPDES Permit to implement this MCM in the first three years of the first permit cycle. Chapter 1127.11 of the City Code of Ordinances was modified to simply adapt the Ohio EPA Construction General Permit # OHC000002 and its subsequent revisions as the City's standard.

The City's primary and secondary Engineering firms are charged with the responsibility of assuring that all developers complied with whichever standard between OHC000004 (and its successors) and the City's pre-existing Ordinance #52-82 was the more stringent.

The City is evaluating and encouraging the use of approved available alternate technologies for reducing storm water runoff volume and improving runoff water quality.

To measure the success of this MCM the City will track the number of Operation &Maintenance (O&M) Agreements established and the number of annual inspections of Post-construction BMP's. The plan can be modified if it is determined that O & M Plans are not being prepared or O & M agreements are not being established. If the result of the program evaluation indicates that this MCM is ineffective, educational outreach to the developer community may need to be increased or modified.

Several BMPs were selected as likely to be achievable and effective practices.

A. BMP: Review subdivision regulations.

TMDLs Addressed: Nutrients, Pathogens and Siltation.

<u>Measurable Goal</u>: Maintain compliance with current and future State and Federal Regulations

**Schedule:** Annually

<u>Responsible Party</u>: The City of Reynoldsburg Storm Water Utility (Delmar Perry), phone # (614)322-5800

**<u>Discussion:</u>** The chapters of the <u>Codified Ordinances of the City of Reynoldsburg</u> that pertain to development projects (mostly portions of Chapters nine and eleven) in the City are reviewed annually and amended where required to maintain agreement with NPDES requirements.

B. <u>BMP:</u> Draft and maintain a stream protection policy.

**TMDLs Addressed:** Nutrients, Pathogens and Siltation.

<u>Measurable Goal:</u> To establish buffer zones bordering sensitive waterways in the City of Reynoldsburg

Schedule: The policy will be reviewed annually.

<u>Responsible Party</u>: The City of Reynoldsburg Storm Water Utility (Delmar Perry), phone # (614)322-5800

**Discussion:** A revised version of the stream protection policy has been prepared and submitted for review and approval. Once the policy is approved and adopted, it will be reviewed annually as part of the preparations for the annual report to the Ohio EPA.

C. BMP: Draft and annually review operation and maintenance policy.

<u>TMDLs Addressed:</u> Nutrients, Pathogens and Siltation.

<u>Measurable Goal:</u> Assure continued effectiveness of Post-construction BMPs on sites that discharge into the City's MS4.

<u>Schedule</u>: Policy will be reviewed and amended (if needed) annually after it is adopted.

<u>Responsible Party</u>: The City of Reynoldsburg Storm Water Utility (Delmar Perry), (614)322-5800

**Discussion:** A draft of a policy was prepared, but never fully finalized. The City currently maintains all public facilities. Facilities located on private property are required to be maintained by the owner(s). A new expanded policy will be prepared to address new types of post-construction BMP's that have been added to City facilities since Permit # 4GQ10002\*AG was issued.

D. <u>BMP</u>: Train staff on the proper maintenance of the post-construction BMP's in the system.

**TMDLs Addressed:** Nutrients and Siltation.

<u>Measurable goal</u>: Provide training or access to information from manufacturers and other sources about BMPs in the MS4 to the Storm Water Utility maintenance staff.

<u>Schedule</u>: Storm Water Utility employees receive extensive training after being hired by the department. Supplemental training is provided when new equipment is added. Employees receive annual training along with the Street Department employees during the good housekeeping training session described in MCM #6.

<u>Responsible Party</u>: The City of Reynoldsburg Storm Water Utility (Delmar Perry), (614)322-5800

<u>Discussion:</u> Freely available and downloadable materials will be used in the training of the system maintenance workers. The storm water utility maintenance workers also attend training sessions conducted by outside organizations, agencies and manufacturers.

## MCM#6: Pollution Prevention/Good Housekeeping for Municipal Operations

The City recognizes its mandate to provide leadership in the fight against storm water pollution, at the local level. The City has also been proactive in the implementation

of controls on pollution generating activities. Salt stockpiles are maintained in shelters to prevent runoff. The City mechanics use waste oils to operate a multi-fuel space heating unit and recycle whenever possible. Recycling is also encouraged in all facilities.

The City created a separate division of the Street Dept. (called the Storm Water Utility) that was assigned the task of performing structural inspections and maintenance on the storm sewer system. This division also was responsible for cleaning out storm sewers and hauling the waste materials to dumpsters for disposal at a landfill.

The City has positioned anti-litter trash receptacles in some areas of the City and cleans them out regularly. The City also operates a street-sweeping program which uses a vacuum street sweeper to remove potential pollutants in the form of oil-soaked dirt and litter from the streets for disposal at a landfill.

To evaluate the success of this MCM the City will annually review the tracking of pollutants applied or collected and disposed of properly as part of the City's routine municipal activities. The results of the review will be evaluated to determine if pollutants generated by City activities can be further reduced or eliminated.

The City will additionally review the results of the annual inspection(s) of Municipal Facilities to determine if existing BMP's are in need of maintenance or if additional BMP's may be needed to improve storm water runoff quality.

Several BMPs were selected as likely to be achievable and effective practices.

A. <u>BMP:</u> Proper disposal of waste oils and grease used in City maintenance facilities

<u>Pollutant(s) treated or reduced</u>: Oils and Greases

Measurable Goal: Reduce oils and greases in storm water runoff

**Schedule:** As needed

<u>Responsible Party</u>: The City of Reynoldsburg Storm Water Utility (Delmar Perry), (614)322-5800

<u>Discussion:</u> Waste oils and lubricants are used as fuel, in a specially equipped heater, or recycled as appropriate.

B. <u>BMP:</u> Salt and grit placement during winter conditions

TMDLS and Pollutants addressed: Siltation and Chlorides

Measurable Goals: Reduce particulates and chlorides in runoff

<u>Schedule</u>: As needed based on weather public safety and directives from the City administrators.

<u>Responsible Party</u>: The City of Reynoldsburg Street Department (Keith Kundtz), (614)322-5800, with general policy direction from the City Service Director (Bill Sampson) (614)322-6810.

#### **Discussion:**

Salt is stored in in two covered buildings and spilled salt is cleaned up.

City salt truck drivers are cautioned to avoid over-application of salt. Some of the trucks have been equipped with electronic rate controllers to reduce excess salt application and more evenly distribute the salt that is applied. The City will continue to pursue options to reduce salt use as much as is consistent with safety and service levels designated by the public and elected officials.

C. <u>BMP</u>: Limit herbicide use during weed control spraying

**TMDLs and Pollutants Addressed:** Priority Organics and toxic herbicides

Measurable Goal: Minimize herbicide residue in streams

Schedule: As needed.

<u>Responsible Party:</u> The City storm water utility (Don Turley), (614)322-5800 and the City Parks and Recreation Dept. (Donna Bauman), (614)322-6806.

**Discussion:** All spraying of herbicides is done by licensed applicators and extra caution is used to reduce application near waterways. The City pays for the applicators to attend the Dept. of Agriculture recertification seminars.

Various alternatives to chemical weed control were evaluated. No practical alternatives for large-scale weed control were identified. Instead efforts have been made to reduce usage by leaving no-spray buffer zones and exercising great caution when applying herbicides at bridges and guardrails near waterways.

The City will continue to monitor developments in this field. The City's pesticide and herbicide applicators attend seminars every year where advances in the field are discussed. If a practicable alternative becomes available the City will evaluate its effectiveness and cost and adopt any alternatives that are deemed suitable.

The City will still continue the limited pesticide and herbicide application programs, with the available controls.

D. <u>BMP:</u> Compliance with ODOT erosion and sediment control standards during road and bridge construction in the City.

TMDLs Addressed: Siltation.

Measurable Goal: Minimize sediment runoff from roadway construction sites

**Schedule**: As needed

<u>Responsible Party</u>: The City of Reynoldsburg Storm Water Utility: (Delmar Perry) (614)322-5800

<u>Discussion:</u> All plans are prepared by or reviewed by the City's engineer or engineering firm for compliance with all applicable environmental standards. Construction projects are also inspected by the City's erosion and sedimentation control inspector or a designated and qualified inspector during construction. The City will adhere to the more stringent of the standards between the ODOT standards and the Ohio EPA standards.

E. <u>BMP:</u> Train City personnel on proper waste disposal techniques

<u>TMDLs and Pollutants targeted</u>: Nutrients, Priority Organics, Siltation, and Oils and Greases

<u>Measurable Goal</u>: Reduce the City's contribution to pollution in the Surface Waters of the State

<u>Schedule</u>: At least one annual session with additional training sessions as needed.

<u>Responsible Party</u>: Franklin Soil and Water Conservation District. See Attached Copy of Annual Contract. (Attachment B) and the City's storm Water Utility (Delmar Perry) (614)322-5800

**<u>Discussion:</u>** City employees are initially trained shortly after hire. Training/refresher programs are presented annually to create more awareness of

F. <u>BMP:</u> Track employee training records

the issues.

<u>Measurable Goal</u>: Maintain assurance that City employees have been trained about actions that they can take to reduce pollution resulting from City activities

Schedule: Annually and as needed.

<u>Responsible Party</u>: The City's Storm Water Utility (Delmar Perry) (614)322-5800

**<u>Discussion:</u>** Records, of pertinent employee training programs and sessions, will be maintained.

G. <u>BMP</u>: Develop and maintain appropriate signage at City facilities reflecting good maintenance techniques.

<u>Measurable Goal</u>: Maintain assurance that City employees re reminded to handle waste materials appropriately.

Schedule: As needed.

<u>Responsible Party</u>: The City of Reynoldsburg Storm Water Utility; (Delmar Perry), phone # (614)322-5800

<u>Discussion:</u> Signs indicating disposal areas and good practices have been placed at City Facilities. Additional signs will be added where advisable and the existing signs will be maintained when needed.

H. <u>BMP</u>: Develop and maintain a work order system for addressing and tracking citizen complaints and concerns.

<u>TMDLs Addressed:</u> Nutrients, Pathogens and Siltation.

<u>Measurable Goal</u>: Provide for an effective system to track completion of investigations of citizen concerns

<u>Schedule</u>: The previously existing system was adapted for this purpose in 2005. A supplemental electronic system has been developed and is being tested.

Responsible Party: the City Street Department (Keith Kundtz) (614)322-5800

<u>Discussion:</u> The previously existing work order system was adapted to encompass the stated goals. The City will maintain some form of work order system to track jobs. The exact form of the system may change. The City is evaluating an electronic tracking system.

I. <u>BMP</u>: Document the number of outfalls and storm water inlets cleaned annually. Record the approximate amount of debris removed on a daily basis.

TMDLs Addressed: Nutrients and Siltation.

<u>Measurable Goal</u>: Assure a thorough program for the inspection and cleaning of the City's storm sewer system.

Schedule: Ongoing

<u>Responsible Party</u>: The City of Reynoldsburg Storm Water Utility: (Delmar Perry), phone # (614)322-5800

<u>Discussion:</u> Two City employees are dedicated to the maintenance and repairing of the Storm sewer system. All material cleaned from the system, by them, is placed in the trash dumpsters at the Street Dept. for disposal at a landfill.

Daily records are maintained for all system maintenance activities performed by the storm sewer maintenance crew. The daily Storm Water Utility Work Order form has been modified to add more detailed information. Records of maintenance, repair, and emergency work performed on the system will be maintained.

J. <u>BMP</u>: Document the amount of de-icing salt applied to streets. Document snowfall

Pollutants addressed: Chlorides

Measurable Goal: Minimize the amount of chlorides in the steams

Schedule: As needed based on climate and weather.

<u>Responsible Party</u>: The City of Reynoldsburg Storm Water Utility: (Delmar Perry), phone # (614)322-5800

**Discussion:** Reports of weather conditions and salt use are prepared after each snow/ice event. The records are then compiled for each winter season. These records are prepared as a part of the Street Dept. operating reports and will continue to be prepared in the future.

K. <u>BMP</u>: Train staff on the proper maintenance of the system.

TMDLs Addressed: Nutrients and Siltation.

<u>Measurable Goal</u>: Assure that the staff is informed about new developments and is trained on the use of new equipment.

Schedule: As needed

<u>Responsible Party</u>: The City of Reynoldsburg Storm Water Utility: (Delmar Perry), phone # (614)322-5800

**<u>Discussion:</u>** City employees are initially trained shortly after hire. Freely available and downloadable materials will be used in the training of the system maintenance workers. The storm water utility maintenance workers also attend training sessions conducted by outside organizations, agencies and manufacturers.

# Chapter IV Glossary of Terms

Biological Survey: Means the Ohio EPA "Biological and Water Quality Study of the Big Walnut Creek Basin 2000" (November 2003)

**BMP:** Acronym for best management practice(s). This means a procedure, policy, or structure designed ultimately to reduce pollution in and or reduce the rate of discharge of storm water into the City's MS4 or from the City's MS4 into a "Surface Water of the State".

City: The City of Reynoldsburg, Ohio.

**City Engineer:** This means an engineering firm hired as a consultant, or when available, an individual professional engineer employed by the City.

**FSWCD**: Franklin Soil and Water Conservation District

**HSTS**: Home Sewage Treatment System.

**MCM** (Minimum Control Measure): A collection of procedures, BMPs and policies designed to achieve a specified category of pollution reduction goals. The NPDES Permit for municipal Storm Water Discharges is divided into six MCMs:

- 1. MCM#1: Public Education
- 2. MCM#2: Public Involvement
- 3. MCM#3: Illicit Discharge Detection and Elimination
- 4. MCM#4: Construction Site Runoff Control
- 5. MCM#5: Post Construction Storm Water Management in New Development and Redevelopment
- 6. MCM#6: Pollution Prevention/Good Housekeeping for Municipal Operations

**MEP:** Maximum Extent Practicable; A technology based feasibility standard for practices to reduce pollutants. MEP standard is described in 40 CFR 122.34 and in the Clean Water Act section 402(p).

(MS4) Municipal Separate Storm Sewer System which means

"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 the 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. "

**(NOI) Notice of Intent:** The form used to "register" for coverage under an Ohio EPA general permit.

**Surface water of the state:** means all streams, lakes, reservoirs, ponds, marshes, wetlands, or other waterways which are situated wholly or partly within the boundaries of the state, except those private which do not combine or affect a junction with a surface water. Waters defined as sewerage systems, treatment works, or disposal systems in Section 61111.01 of the ORC are not included.

**SWACO:** Solid Waste Authority of Central Ohio

TMDL Report: means the Ohio EPA August 19, 2005 report "Total Maximum Daily Loads for the Big Walnut Creek Watershed"

## Chapter V: Schedule of BMP's arranged by year:

Year 2015		
	MCM #1	

- a. Provide educational exposure and materials to students in the City of Reynoldsburg school system. Goal is to reach at least 50% of the students in the City of Reynoldsburg school system (cumulative over the course of a permit cycle).
- b. Develop and maintain a link or links on the City's website that will provide storm water pollution control information to the general public and allow for public input of ideas and complaints. Also applicable to: MCM#2 and MCM #4

#### 2015 MCM #1 continued

- c. Develop and distribute informational handouts and brochures, about general and local storm water issues. Review and revision (if needed) of existing pamphlets will be performed in the first two years of each permit cycle.
- d. Advertise community cleanup days.
- e. Publish at least one article annually in a publication available in the City.

#### MCM #2

- a. Maintain a website to provide for citizen input of information on local waterways and storm sewer systems. Also applies to MCM #3 and MCM #4
- b. Identify annual event (e.g. community clean-up days) for City of Reynoldsburg participation. Assist in administration and organization. Continue event on an annual basis. Track the number of residents participating.
- c. Maintain a system to record contacts from citizens (via any means) and track the investigation and resolution of their concerns and comments pertaining to storm water. Also applicable to MCM#3, MCM #4, MCM #5, and MCM#6
- d. Develop and distribute informational handouts and brochures, about general and local storm water issues. Review and revision (if needed) of existing pamphlets will be performed in the first two years of each permit cycle.

#### **MCM #3**

- a. Add new storm water systems in the area to the City GIS.
- b. Conduct dry-weather screening of outfalls for flows and illicit discharges.
- c. Review and update (if needed) the Ordinance (Chapter 960.03) prohibiting illicit discharges into the City's MS4.
- d. City inspectors and street maintenance personnel will be trained on how to detect and identify illicit discharges.

- a. Site Plan Review by the City Engineer and City storm water utility employees
- b. Inspect construction sites to verify compliance with current erosion and sediment control standards.

#### 2015 MCM #4 continued

- c. Maintain an erosion control ordinance or ordinances that set standards for storm water pollution control on construction sites and provide enforcement tools.
- d. Provide development communities with erosion and sediment control ordinance and requirements
- e. Train City inspectors to be able to identify erosion and run-off problems

#### MCM #5

- a. Review subdivision regulations.
- b. Draft a stream protection policy.
- c. Draft or annually review operation and maintenance policy.
- d. Train staff on the proper maintenance of the post-construction BMP's in the MS4.

- a. Proper Disposal of waste oils and grease used in City maintenance facilities
- b. Control salt and grit placement during winter conditions
- c. Control herbicide use during weed control spraying
- d. Maintain compliance with ODOT erosion and sediment control standards during road and bridge construction in the City
- e. Train City personnel on proper waste disposal techniques
- f. Track employee training records
- g. Develop and maintain appropriate signage at City facilities reflecting good maintenance techniques.
- h. Maintain a work order system for addressing and tracking citizen complaints and concerns.
- i. Document the number of outfalls and curb inlets cleaned annually. Record the approximate amount of debris removed on a daily basis.

#### 2015 MCM #6 continued

j.	Document the amount of de-icing salt applied to streets. Document snowfall		
k.	Train staff on the proper maintenance of the system.		
	Year 2016		

### MCM #1

- a. Provide educational exposure and materials to students in the City of Reynoldsburg school system. Goal is to reach at least 50% of the students in the City of Reynoldsburg school system (cumulative over the course of a permit cycle).
- b. Develop and maintain a link or links on the City's website that will provide storm water pollution control information to the general public and allow for public input of ideas and complaints. Also applicable to: MCM#2 and MCM #4
- c. Advertise community cleanup days.
- d. Publish at least one article annually in a publication available in the City.
- e. In conjunction with the Franklin County (and Fairfield and Licking Counties if applicable) Board of Health, Identify owners of Home Sewage Treatment Systems (HSTSs). Contact and educate them about the proper methods of maintenance. This may require multiple years to complete and be done in any year or combination of years of each permit cycle. Each homeowner to be contacted at least once this permit cycle
- f. If not completed in 2015, develop and distribute informational handouts and brochures, about general and local storm water issues. Review and revision (if needed) of existing pamphlets will be performed in the first two years of each permit cycle.

- a. Maintain a website to provide for citizen input of information on local waterways and storm sewer systems. Also applies to MCM #3 and #4
- b. Identify annual event (e.g. community clean-up) for City of Reynoldsburg participation. Assist in administration and organization. Continue event on an annual basis. Track the number of residents participating.

#### 2016 MCM #2 continued

c. Maintain a system to record contacts from citizens (via any means) and track the investigation and resolution of their concerns and comments pertaining to storm water. Also applicable to MCM#3, MCM #4, MCM #5, and MCM#6

#### MCM #3

- a. Add new storm water systems in the area to the City GIS.
- b. Conduct dry-weather screening of outfalls for flows and illicit discharges.
- c. In conjunction with the Franklin County (and Fairfield and Licking Counties if applicable) Board of Health, Identify owners of Home Sewage Treatment Systems. Conduct a physical evaluation of each HSTS to verify condition, location, and type of connection (if any) with the City's MS4. This may require multiple years to complete and be done in any year or combination of years of the permit cycle. Each homeowner to be contacted at least once this permit cycle.
- d. Review and update (if needed) the Ordinance (Chapter 960.03) prohibiting illicit discharges into the City's MS4.
- e. City inspectors and street maintenance personnel will be trained on how to detect and identify illicit discharges.

#### **MCM #4**

- a. Site Plan Review by the City Engineer and City storm water utility employees
- b. Inspect construction sites to verify compliance with current erosion and sediment control standards.
- c. Maintain an erosion control ordinance or ordinances that set standards for storm water pollution control on construction sites and provide enforcement tools.
- d. Provide development communities with erosion and sediment control ordinance and requirements.
- e. Train City inspectors to be able to identify erosion and run-off problems

#### MCM #5

a. Review subdivision regulations.

#### b. 2016 MCM #5 continued

- c. Maintain a stream protection policy.
- d. Draft or annually review operation and maintenance policy.
- e. Train staff on the proper maintenance of the post-construction BMP's in the system.

#### MCM #6

- a. Proper Disposal of waste oils and grease used in City maintenance facilities
- b. Control salt and grit placement during winter conditions
- c. Control herbicide use during weed control spraying
- d. Complye with ODOT erosion and sediment control standards during road and bridge construction in the City
- e. Train City personnel on proper waste disposal techniques
- f. Track employee training records
- g. Maintain appropriate signage at City facilities reflecting good maintenance techniques.
- h. Develop and maintain a work order system for addressing and tracking citizen complaints and concerns.
- i. Document the number of outfalls and curb inlets cleaned annually. Record the approximate amount of debris removed on a daily basis.
- j. Document the amount of de-icing salt applied to streets. Document snowfall
- k. Train staff on the proper maintenance of the system.

 <b>Year 2017</b>	

#### MCM #1

a. Provide educational exposure and materials to students in the City of Reynoldsburg school system. Goal is to reach at least 50% of the students in the City of Reynoldsburg school system (cumulative over the course of a permit cycle).

#### 2017 MCM #1 continued

- b. Develop and maintain a link or links on the City's website that will provide storm water pollution control information to the general public and allow for public input of ideas and complaints. Also applicable to: MCM#2 and MCM #4
- c. Advertise community cleanup days
- d. Publish at least one article annually in a publication available in the City.
- e. In conjunction with the Franklin County (and Fairfield and Licking Counties if applicable) Board of Health, Identify owners of Home Sewage Treatment Systems. Contact and educate them about the proper methods of maintenance. This may require multiple years to complete and be done in any year or combination of years of each permit cycle. Each homeowner to be contacted at least once this permit cycle

#### **MCM #2**

- a. Identify annual event (e.g. community clean-up) for City of Reynoldsburg participation. Assist in administration and organization. Continue event on an annual basis. Track the number of residents participating.
- b. Maintain a system to record contacts from citizens (via any means) and track the investigation and resolution of their concerns and comments pertaining to storm water. Also applicable to MCM#3, MCM #4, MCM #5, and MCM#6

- a. Add new storm water systems in the area to the City GIS.
- b. Review and Update (if needed) the Ordinance (Chapter 960.03) prohibiting Illicit Discharges into the City's MS4.
- c. Conduct dry-weather screening of outfalls for flows and illicit discharges.
- d. In conjunction with the Franklin County (and Fairfield and Licking Counties if applicable) Board of Health, Identify owners of Home Sewage Treatment Systems. Conduct a physical evaluation of each HSTS to verify condition, location, and type of connection (if any) with the City's MS4. This may require multiple years to complete and be done in any year or combination of years of the permit cycle. Each homeowner to be contacted at least once this permit cycle.

#### 2017 MCM #3 continued

e. City inspectors and street maintenance personnel will be trained on how to detect and identify illicit discharges.

#### **MCM #4**

- a. Site Plan Review by the City Engineer and City storm water utility employees
- b. Inspect construction sites to verify compliance with current erosion and sediment control standards.
- c. Maintain an erosion control ordinance or ordinances that set standards for storm water pollution control on construction sites and provide enforcement tools.
- d. Provide development communities with erosion and sediment control ordinance and requirements
- e. Train City inspectors to be able to identify erosion and run-off problems

#### **MCM #5**

- a. Review subdivision regulations.
- b. Maintain a stream protection policy.
- c. Draft or annually review operation and maintenance policy.
- d. Train staff on the proper maintenance of the post-construction BMP's in the system.

- a. Proper Disposal of waste oils and grease used in City maintenance facilities
- b. Control salt and grit placement during winter conditions
- c. Control herbicide use during weed control spraying
- d. Comply with ODOT erosion and sediment control standards during road and bridge construction in the City
- e. Train City personnel on proper waste disposal techniques
- f. Track employee training records

### 2017 MCM #6 continued

- g. Maintain appropriate signage at City facilities reflecting good maintenance techniques.
- h. Develop and maintain a work order system for addressing and tracking citizen complaints and concerns.
- i. Document the number of outfalls and curb inlets cleaned annually. Record the approximate amount of debris removed on a daily basis.
- j. Document the amount of de-icing salt applied to streets. Document snowfall
- k. Train staff on the proper maintenance of the system.

 <b>Year 2018</b>	

#### MCM #1

- a. Provide educational exposure and materials to students in the City of Reynoldsburg school system. Goal is to reach at least 50% of the students in the City of Reynoldsburg school system (cumulative over the course of a permit cycle).
- b. Develop and maintain a link or links on the City's website that will provide storm water pollution control information to the general public and allow for public input of ideas and complaints. Also applicable to: MCM#2 and MCM #4
- c. Advertise community cleanup days..
- d. Publish at least one article annually in a publication available in the City.
- e. In conjunction with the Franklin County (and Fairfield and Licking Counties if applicable) Board of Health, Identify owners of Home Sewage Treatment Systems. Contact and educate them about the proper methods of maintenance. This may require multiple years to complete and be done in any year or combination of years of each permit cycle. Each homeowner to be contacted at least once this permit cycle

#### **MCM #2**

a. Maintain a website to provide for citizen input of information on local waterways and storm sewer systems. Also applies to MCM #3 and MCM #4

# 2018 MCM #2 continued

- b. Identify annual event (e.g. community clean-up) for City of Reynoldsburg participation. Assist in administration and organization. Continue event on an annual basis. Track the number of residents participating.
- c. Maintain a system to record contacts from citizens (via any means) and track the investigation and resolution of their concerns and comments pertaining to storm water. Also applicable to MCM#3, MCM #4, MCM #5, and MCM#6.

#### **MCM #3**

- a. Add new storm water systems in the area to the City GIS.
- b. Conduct dry-weather screening of outfalls for flows and illicit discharges.
- c. In conjunction with the Franklin County (and Fairfield and Licking Counties if applicable) Board of Health, Identify owners of Home Sewage Treatment Systems. Conduct a physical evaluation of each HSTS to verify condition, location, and type of connection (if any) with the City's MS4. This may require multiple years to complete and be done in any year or combination of years of the permit cycle. Each homeowner to be contacted at least once this permit cycle.
- d. Review and Update (if needed) the Ordinance (Chapter 960.03) prohibiting Illicit Discharges into the City's MS4.
- e. City inspectors and street maintenance personnel will be trained on how to detect and identify illicit discharges.

- a. Site Plan Review by the City Engineer and City storm water utility employees
- b. Inspect construction sites to verify compliance with current erosion and sediment control standards.
- c. Maintain an erosion control ordinance or ordinances that set standards for storm water pollution control on construction sites and provide enforcement tools.
- d. Provide development communities with erosion and sediment control ordinance and requirements
- e. Train City inspectors to be able to identify erosion and run-off problems

# 2018 continued

#### **MCM #5**

- a. Review subdivision regulations.
- b. Maintain a stream protection policy.
- c. Draft or annually review operation and maintenance policy.
- d. Train staff on the proper maintenance of the post-construction BMP's in the system.

- a. Proper Disposal of waste oils and grease used in City maintenance facilities
- b. Control salt and grit placement during winter conditions
- c. Control herbicide use during weed control spraying
- d. Comply with ODOT erosion and sediment control standards during road and bridge construction in the City
- e. Train City personnel on proper waste disposal techniques
- f. Track employee training records
- g. Maintain appropriate signage at City facilities reflecting good maintenance techniques.
- h. Develop and maintain a work order system for addressing and tracking citizen complaints and concerns.
- i. Document the number of outfalls and curb inlets cleaned annually. Record the approximate amount of debris removed on a daily basis.
- j. Document the amount of de-icing salt applied to streets. Document snowfall
- k. Train staff on the proper maintenance of the system.

Year 2019
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#### MCM #1

- a. Provide educational exposure and materials to students in the City of Reynoldsburg school system. Goal is to reach at least 50% of the students in the City of Reynoldsburg school system (cumulative over the course of a permit cycle).
- b. Develop and maintain a link or links on the City's website that will provide storm water pollution control information to the general public and allow for public input of ideas and complaints. Also applicable to: MCM#2 and MCM #4
- c. Advertise community cleanup days.
- d. Publish at least one article annually in a publication available in the City.
- e. In conjunction with the Franklin County (and Fairfield and Licking Counties if applicable) Board of Health, Identify owners of Home Sewage Treatment Systems. Contact and educate them about the proper methods of maintenance. This may require multiple years to complete and be done in any year or combination of years of each permit cycle. Each homeowner to be contacted at least once this permit cycle

#### **MCM #2**

- a. Maintain a website to provide for citizen input of information on local waterways and storm sewer systems. Also applies to MCM #3 and MCM #4
- b. Identify annual event (e.g. community clean-up) for City of Reynoldsburg participation. Assist in administration and organization. Continue event on an annual basis. Track the number of residents participating.
- c. Maintain a system to record contacts from citizens (via any means) and track the investigation and resolution of their concerns and comments pertaining to storm water. Also applicable to MCM#3, MCM #4, MCM #5, and MCM#6.

- a. Add new storm water systems in the area to the City GIS.
- b. Conduct dry-weather screening of priority outfalls for flows and illicit discharges.

# 2019 MCM #3 continued

- c. In conjunction with the Franklin County (and Fairfield and Licking Counties if applicable) Board of Health, Identify owners of Home Sewage Treatment Systems. Conduct a physical evaluation of each HSTS to verify condition, location, and type of connection (if any) with the City's MS4. This may require multiple years to complete and be done in any year or combination of years of the permit cycle. Each homeowner to be contacted at least once this permit cycle.
- d. Review and Update (if needed) the Ordinance (Chapter 960.03) prohibiting Illicit Discharges into the City's MS4.
- e. City inspectors and street maintenance personnel will be trained on how to detect and identify illicit discharges.

### **MCM #4**

- a. Site Plan Review by the City Engineer and City storm water utility employees
- b. Inspect construction sites to verify compliance with current erosion and sediment control standards.
- c. Maintain an erosion control ordinance or ordinances that set standards for storm water pollution control on construction sites and provide enforcement tools.
- d. Provide development communities with erosion and sediment control ordinance and requirements
- e. Train City inspectors to be able to identify erosion and run-off problems

- a. Review subdivision regulations.
- b. Maintain a stream protection policy.
- c. Draft or annually review operation and maintenance policy.
- d. Train staff on the proper maintenance of the post-construction BMP's in the system.

# 2019 continued

#### **MCM #6**

- a. Proper Disposal of waste oils and grease used in City maintenance facilities
- b. Control salt and grit placement during winter conditions
- c. Control herbicide use during weed control spraying
- d. Comply with ODOT erosion and sediment control standards during road and bridge construction in the City
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- a. Provide educational exposure and materials to students in the City of Reynoldsburg school system. Goal is to reach at least 50% of the students in the City of Reynoldsburg school system (cumulative over the course of a permit cycle).
- b. Develop and maintain a link or links on the City's website that will provide storm water pollution control information to the general public and allow for public input of ideas and complaints. Also applicable to: MCM#2 and MCM #4

# Years after 2019 MCM #1 continued

- c. Identify owners of Home Sewage Treatment Systems. Contact and educate them about the proper methods of maintenance. This may require multiple years to complete and be done in any year or combination of years of each permit cycle. Each homeowner to be contacted at least once per permit cycle.
- d. Develop and distribute informational handouts and brochures, about general and local storm water issues. Review and revision (if needed) of existing pamphlets will be performed in the first two years of each permit cycle.
- e. Advertise community cleanup days.
- f. Publish at least one article annually in a publication available in the City.

### MCM #2

- a. Maintain a website to provide for citizen input of information on local waterways and storm sewer systems. Also applies to MCM #3 and MCM #4
- b. Identify annual event (e.g. community clean-up) for City of Reynoldsburg participation. Assist in administration and organization. Continue event on an annual basis. Track the number of residents participating.
- c. Maintain a system to record contacts from citizens (via any means) and track the investigation and resolution of their concerns and comments pertaining to storm water. Also applicable to MCM#3, MCM #4, MCM #5, and MCM#6.

- a. Add new storm water systems in the area to the City GIS.
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- c. Review and Update (if needed) the Ordinance (Chapter 960.03) prohibiting Illicit Discharges into the City's MS4.
- d. City inspectors and street maintenance personnel will be trained on how to detect and identify illicit discharges.

# Years after 2019 continued

#### **MCM #4**

- a. Site Plan Review by the City Engineer and City storm water utility employees
- b. Inspect construction sites to verify compliance with current erosion and sediment control standards.
- c. Maintain erosion control ordinances that set standards for storm water pollution control on construction sites and provide enforcement tools.
- d. Provide development communities with erosion and sediment control ordinance and requirements
- e. Train City inspectors to be able to identify erosion and run-off problems

### **MCM #5**

- a. Review subdivision regulations.
- b. Maintain a stream protection policy.
- c. Draft or annually review operation and maintenance policy.
- d. Train staff on the proper maintenance of the post-construction BMP's.

- a. Proper Disposal of waste oils and grease used in City maintenance facilities
- b. Control salt and grit placement during winter conditions
- c. Control herbicide use during weed control spraying
- e. Comply with ODOT erosion and sediment control standards during road and bridge construction in the City
- f. Train City personnel on proper waste disposal techniques
- g. Track employee training records
- h. Maintain appropriate signage at City facilities reflecting good maintenance techniques.

# Years after 2019 MCM #6 continued

- i. Maintain a work order system for addressing and tracking citizen concerns.
- j. Document the number of outfalls and curb inlets cleaned annually. Record the approximate amount of debris removed on a daily basis.
- k. Document the amount of de-icing salt applied to streets. Document snowfall
- l. Train staff on the proper maintenance of the system.

# City of Reynoldsburg, Ohio

### Certification

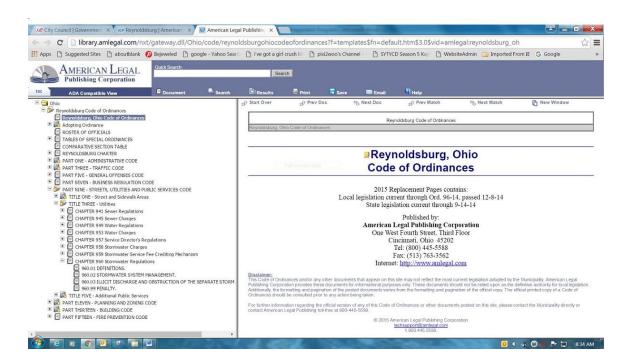
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, 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.

Brad McCloud
Mayor
City of Reynoldsburg, Ohio

# Attachment A

Attachment A link can be found on the City of Reynoldsburg's website

- 1) Government (Tab up top)
- 2) City Council (Click from the pull down list)
- 3) City Code of Ordinance (Right side in blue)
- 4) This will take you to American Legal website
- 5) Click on the View Code button in blue
- 6) Part nine STREETS, UTILITIES AND PUBLIC SERVICES CODE
- 7) TITLE THREE Utilities
- 8) Chapter 960 Stormwater Regulations



# **Attachment B**

See below the Franklin Soil and Water Conservation District Agreement



# 2016 Intergovernmental Working Agreement with City of Reynoldsburg

This working agreement covers a reporting period starting January 1, 2016 and expires on December 31, 2016. The agreement is subject to the limitations of authorities, resources and policies of the Franklin Soil and Water Conservation District and the City of Reynoldsburg (the City).

# Franklin Soil & Water will provide the following services for the City:

# Minimum Control Measure No. 1 & 2: Public Education and Outreach; Public Participation and Involvement

Contact 900 students K-12 through educational programs and materials. Education programs are targeted to storm water and water quality.

Provide the City with Water Quality Partnership materials to reach out to City businesses. Franklin Soil and Water will provide program information, pledge form , draft press release and text for promoting the program and window clings for the City to use.

Support developer outreach through Franklin Soil and Water Conservation District. The City will receive recognition in our Urban Review Newsletter that goes out about three times a year, in advertising for webinars and stormwater roundtables about 5 times a year, and at the Central Ohio Stormwater Expo. We will be sure to provide the MS4 community with a progress report for their Annual Report.

# Minimum Control Measure No. 3: Illicit Discharge Detection and Elimination

Upon initial investigation it appears that the City has approximately 168 parcels with household sewage treatment systems. To assist in distributing workloads and accommodating budgets, Franklin Soil and water will investigate approximately one third of these locations, or 56 parcels, in 2016.

These investigations will be done in coordination with Franklin County Public Health and will use sub-meter GPS data loggers to map the locations of systems. The mapping will collect basic information including the type of system and general condition of system as well as system outlets if they exist. Prior to conducting field work, FSWCD will send out a mailing explaining the inventory as well as providing education information which can be applied to meeting current stormwater permit requirements. The data will be post-processed and supplied to the City to be incorporated into their GIS.

# Minimum Control Measure No. 6: Good Housekeeping

Provide a Good Housekeeping Workshop to the City staff.

# **Compensation:**

The City shall compensate Franklin Soil and Water in the form of a grant in the amount of \$8,000.00. Funds will be expended as needed to meet the grant agreement and support Soil and Water's current mission and goals.

A list of services provided will be maintained by Franklin Soil and Water. A biannual report shall be provided to the City that will include:

Activities completed in that 6-month period; and Comparison of services provided and services anticipated.

In the event that assistance exceeds or is less than the estimated numbers for programs provided, the next year's grant will be adjusted accordingly to compensate for the previous year's numbers. Franklin Soil and Water reserves the right to request additional support for the current year if a request from the City is outside of this grant agreement and cannot be met with existing resources. If both parties agree that the amount of assistance provided is on target or close to target, the next year's grant will be calculated solely on anticipated assistance needed.

# **It is Mutually Agreed:**

That Franklin Soil and Water is a conservation technical and educational service agency and therefore is not granted regulatory authority in the Ohio Revised Code.

That the City and Franklin Soil and Water will meet when necessary to review and coordinate activities and programs related to working agreement.

That credit will be given jointly to Franklin Soil and Water and the City on products developed as part of this working agreement.

That this working agreement may be amended or terminated at any time by mutual consent of both parties, and that the agreement may be terminated by either party giving sixty (60) days notice in writing to the other.

SIGNATURES The signatures below certify consent on the above agreement.					
FRANKLIN SOIL AND WATER CONSERVATION DISTRICT					
Signature	Title	Date			
CITY OF REYNOLDSBURG					
Signature	 Title	 Date			

# **Attachment**

# ESTIMATED COSTS FOR REYNOLDSBURG GRANT

ACTIVITY		Cost Estimate
Student Programming Contacts	Stormwater education programming provided to 900 students.	\$3,350
Business Outreach	Water Quality Partnership Program materials.	\$150
Developer Outreach	Support and receive credit for developer outreach efforts through Franklin Soil and Water.	\$500
IDDE	Field location and condition of HSTS in coordination with Franklin County Public Health.	\$3,600
Good Housekeeping Workshop	Develop and provide a good housekeeping workshop to City of Reynoldsburg staff.	\$400
TOTAL		\$8,000.00