COLUMBUS & FRANKLIN COUNTY METRO PARKS

Stormwater Management Program 2025

Updated by
Metro Parks and
Franklin Soil and Water Conservation District
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INTRODUCTION

The Purpose of the SWMP Plan

The purpose of the Stormwater Management Program (SWMP) is to protect and improve water quality, stream corridors and public health in accordance with federal and state stormwater regulations. Polluted stormwater runoff is often transported through municipal separate storm sewer systems (MS4s) and ultimately discharged into local rivers and streams without treatment. To address this reality, federal and state regulations require the establishment of MS4 stormwater management programs to improve the nation's waterways by reducing the quantity of pollutants that stormwater picks up and carries into storm sewer systems during storm events. Common pollutants include oil and grease from roadways, pesticides from lawns, sediment from construction sites, bacteria from failing septic systems and carelessly discarded trash. When deposited into nearby waterways through storm sewer system discharges, these pollutants can impair waterways thereby adversely impacting recreational uses, drinking water supplies, living organisms and their habitats.

The Columbus and Franklin County Metro Parks (Metro Parks) is required by the MS4 Stormwater permit administered by the Ohio Environmental Protection Agency (Ohio EPA) to develop, implement and support a Stormwater Management Program to the maximum extent practicable to protect water quality. The requirements of the stormwater permit are developed and administered by the Ohio EPA as authorized by the Ohio Revised Code (ORC) Chapter 6111 on water pollution control and as required by the Federal Clean Water Act. The SWMP must include management practices, control techniques, system designs and engineering methods and shall be modified to include provisions as Ohio EPA determines appropriate after its review of the program for the control of stormwater pollutants. The stormwater permit applies only to the MS4s in the urbanized area as defined by the 2010 US Census although Metro Parks applies the SWMP across the entirety of the park district.

The MS4 National Pollutant Discharge Elimination System (NPDES) Permit # OHQ000004 outlines six minimum control measures (MCMs) that a SWMP must address. This stormwater program includes: goal oriented mechanisms, practices and activities; tables of organization indicating lines of communication, authority and responsibility.

STORMWATER MANAGEMENT PROGRAM PLAN OUTLINE

The following outlines the structure and rationale of Metro Parks' Stormwater Management Program and the plan for implementation as required by the permit.

Minimum Control Measures

The plan is organized by these six minimum control measures (MCMs)

MCM 1) public education and outreach
MCM 2) public participation / involvement
MCM 3) illicit discharge detection and elimination (IDDE)
MCM 4) construction site runoff control
MCM 5) post-construction runoff control
MCM 6) pollution prevention / good housekeeping for municipal operations

These MCMs are set forth in the NPDES permit, and are recognized as the critical factors that help to reduce pollution to our waterways. The MCMs provide a comprehensive stormwater management approach through:

- education and involvement of staff and the public
- mapping the stormwater system
- identifying and resolving pollution discharges
- managing and improving stormwater quantity and quality
- ensuring ongoing maintenance of stormwater management systems after construction
- utilizing best management practices within Metro Parks facilities

MCM Mechanisms, Practices, Activities

For each minimum control measure, the mechanisms, practices and activities that will be implemented to minimize the discharge of pollutants from the sewer system are outlined consistent with permit requirements. Where applicable the mechanisms, practices and activities are tied to targeted audiences, and target pollutants through themes and messaging related to each activity.

Legal Authority

Metro Parks is a political subdivision of the State of Ohio governed by the provisions of Section 1545 of the Ohio Revised Code, its bylaws, and other applicable State and Federal Statutes. Under ORC 1545, the Board of Park Commissioners has the authority to establish rules and regulations and adopt programs and policies that are not in conflict with State or Federal Law.

The requirements and practices of this SWMP Plan are within the authority and ability of Metro Parks. The authority of the Board of Park Commissioners has been outlined in passage of a resolution put in place by Metro Parks. This resolution adopts and decrees implementation of this SWMP for the purpose of permit compliance and water quality improvements for the community.

Measurable Goals

Measurable goals are included for each mechanism, practice and activity outlined for each MCM. Each goal, at a minimum, meets MCM performance standards under the permit requirements. Where applicable, measurable goals are targeted towards specific procedures and audiences within the community, and are measurable over the five-year term of the permit.

Responsible Parties (Implementation)

The executive director of Metro Parks is responsible for the overall management and implementation of the SWMP. The deputy director, resource manager, managers of park operations, and planning and design manager all support the executive director and are responsible for the implementation of this SWMP. The Franklin Soil and Water Conservation District (FSWCD) serves as a program consultant and assists in program implementation as needed. See the organizational chart and the SWMP Plan Spreadsheet for further details.

Rationale

Rationale for how and why each of the measurable goals were selected is provided within the SWMP Plan Spreadsheet. Under this program, all measurable goals and each of the activities adopted target specific audiences and water quality concerns with proven and novel mechanisms, while addressing TMDL recommendations where applicable.

Reporting

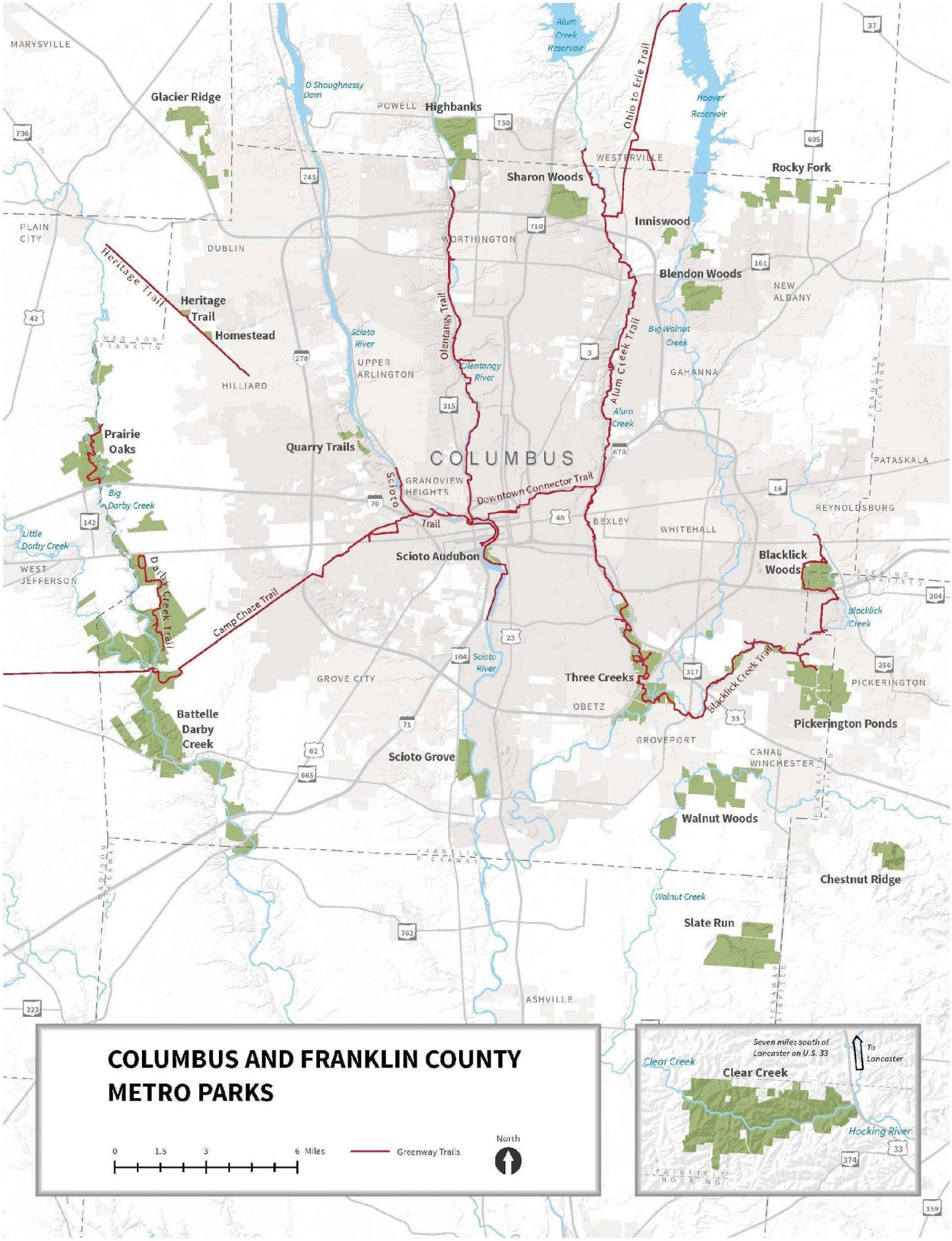
The SWMP Plan must be prepared and submitted every five years and must contain the planned actions and activities that will be used annually to maintain compliance with the Permit. In addition, the permit requires Metro Parks to submit an annual report by April 1 of each year that details actions taken in the previous year to achieve compliance.

SWMP Plan Spreadsheet

Metro Parks utilizes a spreadsheet system for each MCM activity to aid in tracking implementation and compliance over the permit term. These sheets can be found in the Appendix. The spreadsheet is meant to be a supporting tool to this document, organizing and outlining clearly and concisely the range of activities Metro Parks shall accomplish from year to year, but also the timeline, responsible parties and program evaluation parameters. It is intended that this tool is used in conjunction with this document to satisfy the permit conditions.

COMMUNITY CHARACTERISTICS

Metro Parks is a regional system of natural area parks that operates in seven counties of central Ohio and manages over 28,500 acres of land. The majority of land is managed in a natural state and extensive efforts are underway to improve or restore a variety of habitats, promote biodiversity, and improve the physical environment. Metro Parks does provide facilities for public passive recreation and education. Metro Parks has a strong tradition of providing quality education programs for all ages and abilities. Further, Metro Parks provides benefits to the local community in terms of economic development and quality of life issues. Park property is located in the following watersheds: Lower Olentangy, Big Darby Creek and Little Darby Creek, Big Walnut including Blacklick Creek, Rocky Fork and Alum Creek tributaries, Scioto River, Walnut Creek and Hocking, including Clear Creek tributary.


COLUMBUS AND FRANKLIN COUNTY METRO PARKS
0 1.5 3 6 Miles
Greenway Trails
North
Glacier Ridge
Highbanks
Sharon Woods
Rocky Fork
Inniswood
Blendon Woods
Heritage Trail
Homestead
Prairie Oaks
Quarry Trails
Scioto Audubon
Blacklick Woods
Three Creeks
Pickerington Ponds
Battelle Darby Creek
Scioto Grove
Walnut Woods
Chestnut Ridge
Slate Run
Clear Creek
Seven miles south of Lancaster on U.S. 33
To Lancaster
Hocking River
Alum Creek Reservoir
O'Shaughnessy Dam
Hoover Reservoir
Ohio to Erie Trail
Olentangy Trail
Alum Creek Trail
Big Walnut Creek
Downtown Connector Trail
Scioto Trail
Camp Chase Trail
Darby Creek Trail
Blacklick Creek Trail
Big Darby Creek
Little Darby Creek
Walnut Creek
MARYSVILLE
PLAIN CITY
DUBLIN
POWELL
WORTHINGTON
WESTERVILLE
NEW ALBANY
GAHANNA
HILLIARD
UPPER ARLINGTON
GRANDVIEW HEIGHTS
BEXLEY
WHITEHALL
REYNOLDSBURG
PATASKALA
WEST JEFFERSON
GROVE CITY
OBETZ
GROVEPORT
PICKERINGTON
CANAL WINCHESTER
ASHVILLE

DEFINITIONS

Best Management Practice (BMP): The most effective, practical methods for the prevention or reduction of pollution from nonpoint sources (eg urban pollutant runoff). Stormwater best management practices include structural or non-structural methods designed to temporarily treat or store stormwater runoff to reduce pollution and mitigate flooding.

Bypass: the intentional diversion of waste streams from any portion of a treatment facility.

Control Measure: any Best Management Practice or other method used to prevent or reduce the discharge of pollutants to surface waters of the state.

CWA (The Act): the Clean Water Act (formerly referred to as the Federal Water Pollution Control Act or Federal Water Pollution Control Act Amendments of 1972)

Discharge: refers to “discharge of a pollutant.”

Home Sewage Treatment System (HSTS): A HSTS is any onsite sewage disposal or treatment system for dwellings that serves as a collection point for sewage, ie septic and aeration systems.

Alternative Wastewater Treatment System (AWTS): An AWTS is any onsite sewage disposal or treatment system for public facilities that serves as a collection point for sewage, ie wetland treatment, drip, compost, vault and biofiltration systems.

Hydrologic Unit Code (HUC): A two- to 12-digit code in the hydrologic unit system that is used to identify all the drainage basins within the United States. The HUC is based on the four levels of classification in the hydrologic unit system: regions (largest), sub-regions, accounting units, and cataloging units (smallest).

Illicit Connection: any man-made conveyance connecting an illicit discharge directly to a municipal separate storm sewer.

Illicit Discharge Detection and Elimination (IDDE): One of the six minimum control measures that is required to be included in the stormwater management program of an operator of a Phase II regulated small municipal separate storm sewer system in order to obtain its National Pollutant Discharge Elimination System permit.

Maximum Extent Practicable (MEP): Although not directly defined by US EPA, this term refers to requiring compliance with regulation requirements to the maximum ability of the permittee.

Minimum Control Measure (MCM): One of six technical areas in a stormwater management program (SWMP) of the NPDES Phase II regulations. These six technical areas are: (1) Public Education and Outreach, (2) Public Participation/Involvement, (3) Illicit Discharge Detection and Elimination, (4) Construction Site Runoff Control, (5) Post-Construction Runoff Control and (6) Pollution Prevention/Good Housekeeping.

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

National Pollutant Discharge Elimination System (NPDES): Federally mandated permit system established by Section 402 of the Clean Water Act, used in the regulation of point sources (eg discharges from industrial and municipal facilities, stormwater discharges from discrete conveyances such as pipes or channels).

NOI: an acronym for “Notice of Intent,” which is the mechanism used to “register” for coverage under a general permit.

Non-traditional MS4: systems similar to separate storm sewer systems in municipalities, such as systems at military bases, hospitals, public universities or prison complexes, and highways and other thoroughfares. The term does not include separate storm sewer systems in very discrete areas such as individual buildings.

Ohio Revised Code (ORC): Legal document containing all the acts that have been passed by the Ohio General Assembly and that have been signed by the Governor of Ohio.

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

Qualitative Habitat Evaluation Index (QHEI): Index designed by the Ohio EPA to establish a measurement of habitat quality that is generally interrelated to physical factors that affect fish communities and other aquatic life, such as macroinvertebrates.

Stormwater: storm water runoff, snow melt runoff, and surface runoff and drainage.

Stormwater Management Program (SWMP): The SWMP is organized by MCMs and includes BMPs, measurable goals, rationale, decision process, responsible parties, time schedules and other appropriate information.

Stormwater Pollution Prevention Plan (SWPPP): A SWPPP identifies all potential pollution sources from a construction site or regulated facility; addresses measures to prevent potential pollutant discharges into water bodies and wetlands; and assists in the compliance with the conditions and terms of the permit.

Surface Waters of the State: 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 waters which do not combine or affect a junction with a surface water. Waters defined as sewerage systems, treatment works, or disposal systems in Section 6111.01 of the ORC are not included.

Total Maximum Daily Loads (TMDL): The Ohio EPA TMDL program, established under Section 303(d) of the Clean Water Act (33 USC 1313), focuses on identifying and restoring polluted rivers, streams, lakes and other surface water bodies. A TMDL is a written, quantitative assessment of water quality problems in a water body and contributing sources of pollution. It specifies the amount a pollutant needs to be reduced to meet water quality standards (WQS), allocates pollutant load reductions, and provides the basis for taking actions needed to restore a water body.[1] (1 Ohio EPA website: http://www.epa.ohio.gov/dsw/tmdl/index.aspx#Ohio's TMDL Process)

PROGRAM ELEMENTS

This Stormwater Management Program is organized by Minimum Control Measures (MCMs). The SWMP includes best management practices (BMPs), measurable goals, rationale, decision process, responsible parties, time schedules, a statement of opinion about the legal authority to implement the BMP, and other appropriate information. This section is designed to correspond with annual reporting forms provided by the Ohio EPA.

MCM 1. PUBLIC EDUCATION AND OUTREACH

Introduction

The first minimum control measure (MCM) requires Metro Parks to distribute educational materials or provide equivalent outreach activities to the community about the impacts of stormwater discharges, including the steps the public can take to reduce pollutants in stormwater runoff. An informed and knowledgeable community is important to a successful stormwater program. This lays the foundation for community participation in responsible land management, and compliance with local and state regulations.

Applicable Requirements from Ohio EPA Permit

- Develop a plan to inform staff and the general public about the steps they can take to reduce stormwater pollution including measurable goals, target audiences, target pollutants and outreach strategy. Five different stormwater themes or messages need to be utilized over the permit term, targeting each TMDL pollutant at least once within the five themes.
- Develop a rationale for target areas and pollutants that will make the greatest difference for stormwater quality.
- Utilize at least five mechanisms (eg newsletters, website, social media, presentations, displays etc) to reach target audiences.
- Evaluate the success of this minimum measure, including how you selected the measurable goals for each education and outreach activity.

Mechanisms, Practices, Activities

The following will be used for public education and outreach:

- Print and digital media to inform 50% of park visitors over the five-year permit period using newsletter, website, social media and interpretive signs and displays.
- Educational Information and Outreach to school and community groups through presentations, interactive displays and hands-on activities.
- Public education programs for Metro Parks visitors and Franklin County residents providing stormwater education and resources.
- Provide stormwater education and information to pet owners using the “Pick Up Poop” program.
- Provide stormwater education to 100% of tenants of park rentals and life estates through annual mailings.
- Provide education and training opportunities for staff to support and facilitate green infrastructure/CGP Table 4b practices.

Stormwater Program Themes

Metro Parks will address at least five different education themes during the duration of this permit. The themes will target existing TMDLs and potential community pollution sources.

- **Stormwater Management Controls** will focus on stormwater pollution prevention opportunities for park staff and visitors. This will incorporate proper use of stream buffers,
- **Stream Corridor Protection** will focus on protecting and establishing stream buffers through planting and maintaining greenspaces. This will address sedimentation in the water and filtration to prevent pollution entering the waterways.
- **Habitat Restoration** will focus on reforestation and reestablishing greenspaces, especially along stream corridors.
- **Stormwater Awareness** will focus on educating people about where stormwater runoff goes and protecting streams from pollution associated with stormwater runoff.
- **Pollution Awareness** will focus on how to prevent pollution, including litter clean ups and dog waste education.

Target Audiences

- **Park Visitors** are targeted for improvements to general runoff pollution.
- **Students and Youth** are targeted because they are the future landowners and decision makers.
- **Community groups** are targeted for their ability to reach a larger audience of residents, landowners and businesses and include:
    - Watershed groups
    - Environmental groups
    - Scout Troops
- **Park staff** are targeted to increase awareness of stormwater topics and for the management of green infrastructure/CGP Table 4b practices.

Responsible Parties

The education staff will be responsible for the overall management and implementation of the stormwater public education and outreach program for Metro Parks. FSWCD will provide guidance and assistance with educational materials and presentations to assist the park district with compliance.

MCM 2. PUBLIC PARTICIPATION AND INVOLVEMENT

Introduction

This minimum measure requires Metro Parks to engage the public for input and involvement in Metro Parks stormwater management program (SWMP) and illicit discharge detection and elimination (IDDE) plan. Public participation and involvement follows good public education and outreach to generate awareness of Metro Parks, local and state regulations. The anticipated results are broader public support, improvements to the program plan and greater benefits to water quality in the county.

Applicable Requirements from Ohio EPA Permit

- Comply with state and local public notice requirements.
- Describe public involvement opportunities in developing and implementing your stormwater management program.
- Describe target audiences for public involvement including residents, businesses, landowners, educational organizations and community groups.
- Five public involvement activities over the permit term, targeting each TMDL pollutant at least once within the five activities.

Background

To address this minimum control measure, Metro Parks will engage in a stormwater management program that allows for and encourages community participation. In order to involve the community effectively, internal leadership and support will continue to be important. For successful program implementation, Metro Parks staff engagement and cooperation will be integral to effective public participation.

Metro Parks' stormwater management program is accessible to the public via Metro Parks' website. The following describes how Metro Parks plans to proceed with the requirements for NPDES permit:

Public Involvement

- Board of Park Commissioner meetings that are open to and attended by the public. At least once per permit term the stormwater plan will be included in the board meeting agenda.
- Website will include the Stormwater Management Plan and email and phone contact information for those wishing to connect with leadership.
- Park visitors, volunteers and staff will have opportunities to assist with clean ups, plantings, invasive species removal and other projects to learn about and improve water quality.

Mechanisms, Practices, Activities

The following will be used for public involvement and participation:

- Opportunity for Public Input during board meetings offered to the public and through social media and the Metro Parks website.
- Public events for Metro Parks visitors and Franklin County residents including stream clean ups, tree plantings and invasive species removal will be offered at least once annually.
- Students will participate in stream quality monitoring programs to encourage better stewardship of our waterways.
- Provide pet waste stations at all parks with pet trails and dog parks to encourage visitors to pick up waste and properly dispose of it.

- Provide volunteer events for groups and individuals to assist with resource management, including invasive species removal.

Themes

Metro Parks will address at least five different education themes during the duration of this permit. The themes will target existing TMDLs and potential community pollution sources.

Stormwater Program Themes

- **Stormwater Management Controls** will focus on stormwater pollution prevention opportunities for park staff and visitors. This will incorporate proper use of stream buffers.
- **Stream Corridor Protection** will focus on protecting and establishing stream buffers through planting and maintaining greenspaces. This will address sedimentation in the water and filtration to prevent pollution entering the waterways.
- **Habitat Restoration** will focus on reforestation and reestablishing greenspaces, especially along stream corridors.
- **Stormwater Awareness** will focus on educating people about where stormwater runoff goes and protecting streams from pollution associated with stormwater runoff.
- **Pollution Awareness** will focus on how to prevent pollution, including litter clean ups and dog waste education.

Target Audiences

- **Park Visitors** are targeted for improvements to general runoff pollution.
- **Students and Youth** are targeted because they are the future landowners and decision makers.
- **Volunteers** are targeted for their ability to assist at the park level and spread awareness in their own communities.
- **Community groups** are targeted for their ability to reach a larger audience of residents, landowners and businesses and include:
    - Watershed groups
    - Environmental groups
    - Scout Troops

Responsible Parties

Manager of Park Operations Jennifer Boniface will be responsible for the overall management and implementation of the stormwater public education and outreach program for Metro Parks. FSWCD will provide guidance and assistance with educational materials and presentations to assist Metro Parks with compliance.

MCM 3. ILLICIT DISCHARGE DETECTION AND ELIMINATION

Introduction

This minimum measure requires Metro Parks to implement and enforce a program to detect and eliminate illicit discharges and includes comprehensive mapping of its Municipal Separate Storm Sewer System (MS4). As defined by Environmental Protection Agency (EPA), an MS4 is: the conveyance or system of conveyances (including roads, catch basins, curbs, gutters, ditches, man-made channels, or storm drains) that is owned or operated by a public body, designed and used for collecting stormwater, is not a combined sewer, and is not part of a Publicly Owned Treatment Works (POTW).

As defined by EPA, an illicit discharge is any discharge to an MS4 that is not composed entirely of stormwater except discharges authorized under an NPDES permit and discharges resulting from firefighting activities. Metro Parks has not identified any of the following non-stormwater discharges as significant contributors of pollutants to our MS4 and as directed by the permit will not address them; waterline flushing, springs, water from crawl space and sump pumps, footer drains, landscape irrigation, lawn watering, diverted stream flows, rising ground waters, individual residential car washing, uncontaminated groundwater, foundation drains, uncontaminated pumped groundwater, air conditioning condensation, dechlorinated swimming pool waters, potable water sources, flow from riparian habitats and wetlands, street wash water, and discharges or flows from firefighting activities.

Addressing this minimum measure includes mapping of the storm sewer system, prohibiting illicit discharges, prosecuting violations, and a plan to detect and address illicit discharges.

Identifying and actively addressing water quality issues within Metro Parks' storm sewer system supports the mission of Metro Parks, ensures that park lands remain a great place to recreate, and serves as an example for maintaining and improving water resources.

Applicable Requirements from Ohio EPA Permit

- Develop, implement and enforce a program to detect and eliminate illicit discharges into Metro Parks' storm sewer system.
- Complete a comprehensive storm sewer system map showing the location of all outfalls and the names and location of all surface waters of the state that receive discharges from those outfalls. The comprehensive storm sewer system map shall include catch basins, pipes, ditches, flood control facilities (retention/detention ponds), post-construction water quality Best Management Practices (BMPs), including type of practice (eg wet extended detention basin, bioretention etc). The map must be updated annually and as needed.
- Mapping must contain a list of all HSTSs and Alternative Wastewater Treatment Systems (AWTS) connected to discharge to your MS4. This map shall include details on the type and size of conduits/ditches in your MS4 that receives discharges from HSTSs and AWTSs, as well as the water bodies receiving the discharges from your MS4.
- Prohibit, through ordinance, or other regulatory mechanism, illicit discharges into the storm sewer system and implement appropriate enforcement procedures and actions.
- Develop and implement a plan to detect and eliminate non-stormwater discharges, including illegal dumping, to your MS4.
- Develop or enhance an operation and maintenance program which determines if existing HSTSs and AWTSs are operating as designed and intended and if not, then a program that requires elimination, upgrade or replacement of the systems.
- Investigate the source of contamination in outfalls identified during the dry weather screening process.

- Inform staff and the public of hazards associated with illegal discharges and improper disposal of waste.

Background

The Metro Parks Stormwater Management Program is part of a progressive effort to reduce the volume of and manage the pollution of stormwater that is conveyed to community streams during storm events.

While the entirety of Columbus and Franklin County Metro Parks is the focus of the Stormwater Management Program, the urbanized areas, as identified in the US Census, are the focus of the NPDES stormwater permit, thus making the minimum requirements of the NPDES permit a subset of the overall effort and direction of Metro Parks' Stormwater Management Program.

As a complement to the stormwater infrastructure that has been mapped, FCPH maintains a list of known HSTSs and AWTSs operated and owned by Metro Parks within Franklin County. While the legal responsibilities of these HSTSs and AWTSs lie with Metro Parks and the legal authority for regulating these systems lies with Franklin County Public Health, MCM III efforts incorporate the continued monitoring of these systems by both FCPH and Metro Parks. Both entities will address and resolve illicit discharge issues as they are identified. All activities undertaken with this MCM that relate to these systems and other sewage related issues help to address the TMDLs of bacteria and nutrients identified in the watersheds within Franklin County.

Mechanisms, Practices, Activities

The following describes how Metro Parks plans to proceed with the requirements for NPDES permit:

- Continue to ensure public and Metro Parks employee awareness on how to recognize, report and address illicit discharges of all types through public education and handling of illegal dumping and pollution complaints.
- Continue dry-weather-screening of the MS4 throughout the park district and incorporate findings into the existing database.
- To complement inspections by FCPH, Metro Parks will also continue inspections of Metro Parks' HSTSs and AWTSs. These inspections will include an evaluation of the systems as well as consideration of various options for resolving malfunctioning systems including:
    - Connecting HSTSs and AWTSs that are accessible or available to sanitary sewer where practical;
    - Repairing, altering or replacing failed HSTSs and AWTSs without access to sanitary sewers to operate as designed and intended;
    - Requiring inspection, operation and maintenance programs of HSTSs and AWTSs;
    - Educating park managers regarding the systems within their scope of duties of NPDES requirements.
    - Evaluate effectiveness of existing IDDE activities and update IDDE plans, the SWMP and program activities as necessary.

Responsible Parties and Legal Authority

Water Pollution Control

Metro Parks is a political subdivision of the State of Ohio governed by the provisions of Section 1545 of the Ohio Revised Code, its bylaws, and other applicable State and Federal Statutes. Under ORC 1545, the Board of Park Commissioners has the authority to appoint park rangers and establish rules and regulations that are enforceable by Metro Parks staff, and to adopt policies that are not in conflict with State or Federal Law. Additionally, peace officers including designated park rangers as defined in ORC 2935.03 can enforce ORC 6111 which states: “no person shall recklessly cause pollution or place or cause to be placed any sewage, industrial waste or other wastes in a location where they cause pollution to any waters of the state without a valid or unexpired permit issued by the director of the Ohio EPA.”

HSTS and AWTS Illicit Discharges and Public Health Nuisances

Franklin County Public Health staff has the authority to enforce Franklin County Public Health Regulation 106, Ohio Administrative Code 3701-29 and Ohio Revised Code 3718.011 to meet the requirements of the Franklin County NPDES Phase II Permit in the area of Illicit Discharge Detection and Elimination. Franklin County Public Health has authority to regulate sewage treatment systems (STS) under Revised Code Chapter 3718 and Franklin County Public Health Regulation 106, Ohio Administrative Code 3701-29.

When it is alleged or upon discovery that a HSTS or AWTS is causing a public health nuisance as defined in RC 3718.011 and/or OAC 3701-29, then Public Health has the authority to investigate such complaints and allegations. Sanitarians are responsible for investigating all illicit discharges and sewage nuisances.

MCM 4. CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

Introduction

This minimum control measure addresses management of stormwater runoff from construction activity that results in a land disturbance of 1 acre or greater. Stormwater runoff management addresses both how water is retained and released during and after stormwater events and how erosion is minimized through the use of site design techniques, the management of construction activity, and the use of erosion control practices until a site is stabilized with permanent vegetation. During a short period of time, uncontrolled construction sites can contribute more sediment to streams than would be deposited naturally during several decades.

During construction, the design and installation of long-term stormwater management controls are also reviewed and inspected along with temporary erosion and sediment controls. These controls may use overlapping or separate Best Management Practices.

Requirements from Ohio EPA Permit

- Develop an ordinance or other regulatory mechanism to require erosion and sediment controls, as well as sanctions to ensure compliance. The regulation will be equivalent with the technical requirements set forth in the Construction General Stormwater Permits.
- Require construction site operators to implement appropriate erosion and sediment control BMPs.
- Require construction site operators to control waste such as, but not limited to, discarded building materials, concrete truck washout, chemicals, litter and sanitary waste at the construction site that may cause adverse impacts to water quality.
- Develop procedures for site inspection and enforcement of control measures.

Background

Metro Parks' planning and design department will review park development plan proposals for compliance with the applicable Construction General Permit prior to seeking the applicable Construction General Permit requirements.

Plan Review Process

A Notice of Intent and the SWPPP must be submitted to the planning and design manager prior to any earth disturbing activity equal to or greater than 1 acre. The planning and design manager must indicate approval or disapproval of the SWPPP to the person filing the plan within 14 working days of submission.

Site Inspection Process

Planning and design staff or designated park staff shall inspect the site on a bi-weekly basis and within 24 hours of a 0.5-inch or greater rainfall "in order to determine compliance" with regulations laid out by the Board of Park Commissioners.

Ensuring proper controls on active construction sites with frequent site inspections and communications during planning will reduce sediment entering streams. By ensuring that proper long-term controls for stormwater management are in place before and during construction, there will be a reduction in nutrients, bacteria and toxicity entering the streams. Hydrology and habitat will also be addressed with proper stormwater controls and the identification of sensitive natural areas before and during construction.

Enforcement Program

The designated inspector will also report the deficiency or noncompliance to the planning and design manager or designee. Upon determination that a person or contractor/firm is not complying with these regulations, Metro Parks may issue a written order to comply to the person, contractor or firm. If non-compliance is identified on a project that is underway, Metro Parks may issue a stop work order or take other action to ensure compliance.

Responsible Parties

Metro Parks' planning and design department and project managers will be responsible for the overall management of this Minimum Control Measure. Implementation of this minimum control measure's requirements will be completed by various contractors and/or Metro Parks staff. Requirements will be addressed by documenting the implementation of BMPs required by the most current OEPA construction general permit. Franklin Soil and Water Conservation District has the authority to provide assistance and review for erosion and sediment control as outlined in ORC 940.

MCM 5. POST-CONSTRUCTION STORMWATER MANAGEMENT IN DEVELOPMENT

Introduction

These measures start at development plan review and continue through ongoing management of stormwater management practices that remain on site after construction. Well-designed and maintained post-construction stormwater management addresses both water quantity and quality for the long term. This includes the use of non-structural Best Management Practices (BMPs), including wise placement of green space and stream buffers which can reduce costs of ongoing maintenance. Benefits of managed stormwater runoff include increased infiltration for ground water recharge, decreased stream erosion through reduction of stormwater volumes, and improved water quality by capturing pollutants from runoff using well-designed BMPs or treatment trains.

Requirements from Ohio EPA Permit

- Develop, implement and enforce a program to address stormwater runoff from new development and redevelopment projects that disturb greater than or equal to 1 acre, including projects less than 1 acre that are part of a larger common plan of development or sale, that discharge into our small MS4. The program will ensure that controls are in place that will prevent or minimize impacts.
- Develop and implement strategies which include a combination of structural and/or non-structural BMPs appropriate for our community.
- Use an ordinance or other regulatory mechanism to address post-construction runoff from new development and redevelopment projects to the extent allowable under State or local law. The ordinance or regulatory mechanism will, at a minimum, be equivalent with the technical requirements set forth in the applicable Ohio EPA NPDES General Stormwater Permit(s) for Construction Activities applicable for our permit area which have been issued at the time of issuance of this permit. This includes the following Ohio EPA NPDES General Stormwater Permits for Construction Activities: OHC000003, OHCD00001 and OHCO00001.

- The plan will ensure adequate long-term operation and maintenance of BMPs, including provisions for how to ensure continuity of O&M plans when the property changes ownership.
- Include, at minimum, one on-site inspection of each post-construction BMP during the term of the permit.

Background

Metro Parks' planning and design department will address stormwater runoff from new park development that disturb greater than or equal to 1 acre, including projects less than one acre that are part of a larger common plan of development or sale, with controls that prevent or minimize water quality impacts.

Metro Parks utilizes both the Franklin County Stormwater Drainage Manual and the Ohio Department of Natural Resources, Rainwater and Land Development Manual as guidelines in developing stormwater improvements and BMPs. By ensuring that proper long-term controls for stormwater management are installed and maintained properly, there will be a reduction in nutrients, bacteria and toxicity entering the streams. Hydrology and habitat will also be addressed with proper stormwater controls and the identification of sensitive natural areas.

Responsible Parties

The planning and design department will be responsible for the overall management and implementation of the post-construction stormwater management program. Franklin Soil and Water will provide support with technical guidance and educational/training opportunities to assist Metro Parks in training and meeting this minimum control measure.

MCM 6. POLLUTION PREVENTION AND GOOD HOUSEKEEPING

Introduction

The Pollution Prevention and Good Housekeeping Minimum Control Measure (MCM) requires the operator of a permitted Municipal Separate Storm Sewer System (MS4) to develop and implement an operation and maintenance program with the ultimate goal of reducing pollutant runoff from parks, maintenance areas, new park construction and land disturbances. TMDLs that may be addressed under MCM 6 are nutrients (from salt and fertilizers), and runoff (from the chemicals, paints, solvents etc).

Applicable Requirements from Ohio EPA Permit

- Required employee training to prevent and reduce stormwater pollution from activities related to park maintenance, new park construction, land disturbances and stormwater system maintenance.
- For facilities not requiring a separate NPDES Permit that conduct activities described in 40 CFR 122.26 (b)(14) such as park and maintenance facilities, and new park facilities, a Stormwater Pollution Prevention Plan (SWP3) shall be developed and implemented using the industrial permit SWP3 as a guide.
- MS4 must adopt maintenance activities, schedules, inspection procedures and proper waste disposal for controls to reduce pollutants.

- For soil disturbance associated with MS4 maintenance, soil must be stabilized within two days (within 50 feet of surface water of the state) or within seven days (not within 50 feet of surface water of the state) of reaching final grade or if the area is to remain inactive for more than 14 days.
- New flood management projects must be assessed for impacts on water quality. Existing projects should also be evaluated for opportunities to incorporate additional water quality protection devices and practices.

Background

Actions completed under this MCM include facility awareness training and provides guidance for the evaluation of facilities and the development of SWPPPs where required. The goal and intent is to effectively provide staff with the knowledge to examine and manage their own actions and facilities in order to reduce stormwater pollution discharges from park facilities.

It is recommended that staff have appropriate operation and maintenance programs which include procedures, maintenance schedules and inspection schedules designed to prevent or reduce pollutant runoff from park operations. Items covered may include:

- proper storing of potential pollutants
- proper disposal of waste
- oil water separator maintenance
- litter pickup
- herbicide and pesticide policies

Metro Parks provides training for staff and facility managers specific to their operations and SWPPP. In-house training includes facility specific information on reducing and preventing stormwater runoff from the facility and addresses the following:

- SWPPP quarterly inspections
- emergency spill procedures
- record keeping
- stormwater flow paths
- proper disposal of waste

The MS4 permit does require Metro Parks to assess new flood management projects for water quality impacts and consider retrofits for existing projects.

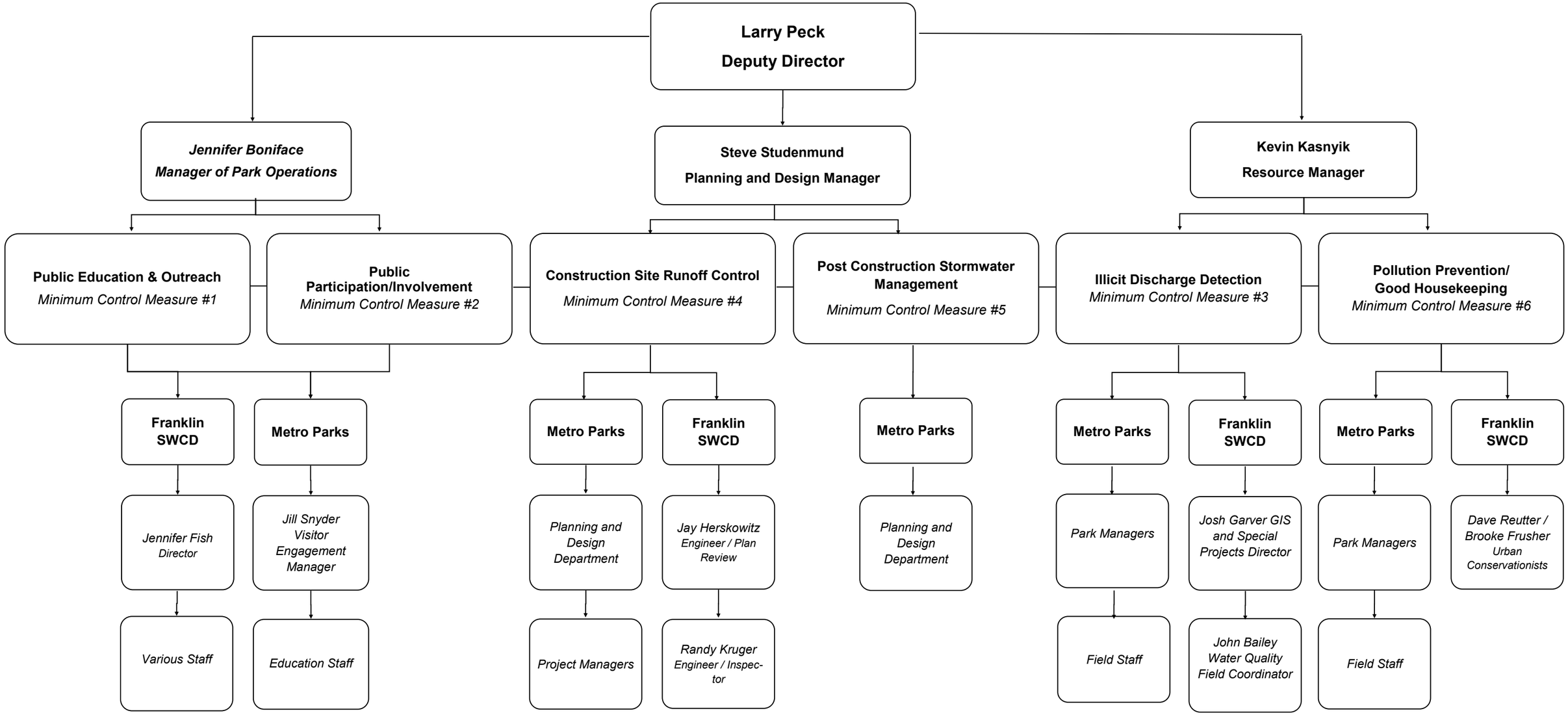
Responsible Parties

Each park manager will be responsible for the overall management and implementation of SWPPP under the scope of their responsibility including quarterly SWPPP inspections of their facilities. Franklin Soil and Water will provide support with technical guidance and educational/training opportunities to assist Metro Parks in training and meeting this minimum control measure.

APPENDIX A:

STORMWATER MANAGEMENT PERMIT ORGANIZATION CHART

METRO PARKS Stormwater Permit Organizational Chart



APPENDIX B:

ILLICIT DISCHARGE DETECTION AND ELIMINATION PLAN

COLUMBUS & FRANKLIN COUNTY METRO PARKS

ILLICIT DISCHARGE DETECTION AND ELIMINATION PLAN

Updated by
Metro Parks and Franklin Soil and Water Conservation District
March 2025

Introduction

This document outlines the processes that Columbus & Franklin County Metro Parks (Metro Parks) is taking to control the introduction of pollutants into their Municipal Separate Storm Sewer System (MS4) to comply with requirements of the National Pollutant Discharge Elimination System (NPDES) permit regulated by the Ohio Environmental Protection Agency (OEPA). This document focuses on Minimum Control Measure (MCM) III as defined in their NPDES permit and takes into consideration pollutants specifically identified through Total Maximum Daily Loads (TMDL), also regulated by OEPA. This document is to supplement current rules established by the Metro Parks to provide for the health, safety and general welfare of the visitors to Metro Parks and is keeping with the spirit of the Federal Water Pollution Control Act (also known as the Clean Water Act) and Ohio's Pollution Control Act.

Metro Parks is entering into its fourth five-year permit, and as such, has completed the basic requirements outlined in MCM III. While the initial mapping and Dry Weather Screening has been completed, there continues to be ongoing efforts to both monitor for and address any illicit discharge issues identified. This document is subject to periodic updates as ongoing efforts are made with the various requirements of the permit and as OEPA clarifies or modifies the language of the permit.

General Permit Information

This document was produced in accordance with the NPDES Small MS4 Stormwater General Permit (OHQ000004) issued to Metro Parks and effective April 1, 2021 thru March 31, 2026.

Supporting Documents and Programs

This document does not stand in isolation. It is part of a larger stormwater management effort, and as such, should be considered in coordination with the following documents and programs:

Federal Clean Water Act

NPDES Small MS4 Stormwater General Permit (OHQ000004)

Ohio Pollution Control Act (Ohio Revised Code 6111)

ODNR Rainwater Manual

Columbus & Franklin County Metro Parks: Rules and Regulations

Columbus & Franklin County Metro Parks: Maintenance Standards Manual

Columbus & Franklin County Metro Parks: Emergency Response Guidelines

Columbus & Franklin County Metro Parks: Strategic Plan

Coordinating Agencies and Departments

This document reflects the cooperative effort between three agencies dedicated to addressing public health issues and protecting and managing water resources. The following partner agencies are involved with this effort:

Columbus & Franklin County Metro Parks
Franklin County Public Health (FCPH)
Franklin Soil and Water Conservation District (FSWCD)

Illicit Discharge: Definition

Stormwater regulations define an "illicit discharge" as:

"any discharge to a municipal separate storm sewer (MS4) that is not composed entirely of stormwater."

Common sources with the potential to produce non-stormwater discharges within Metro Parks may include developed park facilities. These areas may be a source of sanitary wastewater, septic system effluent, vehicle wash water, washdown from grease traps, motor oil, antifreeze, gasoline and fuel spills, among other substances. Although these illicit discharges can enter the storm drain system in various ways, they generally result from either direct connections (eg wastewater piping either mistakenly or deliberately connected to the storm drains) or indirect connections (eg, infiltration into the storm drain system, spills, or "midnight dumping.")

Municipal Separate Storm Sewer System (MS4): Definition

Metro Parks' MS4 is characterized as a conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains) owned or operated by Metro Parks which is designed or used for collecting or conveying stormwater, and is not part of a combined sewer system.

Illicit Discharge Exemptions

The following discharges are exempt until such time as they are determined by Metro Parks to be significant contributors of pollutants to the MS4. Additionally, other water sources not containing pollutants may be considered at the discretion of Metro Parks' executive director.

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

In addition, the following are not to be deemed as illicit discharges:

Discharges specified by Metro Parks as being necessary to protect public health and safety.

Decision Process and Rational

Metro Parks is a tax-supported public service agency whose mission is to conserve open spaces while providing places and opportunities that encourage people to discover and experience nature. Every year, more than 12 million visitors enjoy the beauty, facilities and educational resources within their 20 parks.

Metro Parks protects more than 28,700 acres of land and water in seven counties, offering free year-round recreational and educational opportunities for youth and adults. They also provide more than 230 miles of trails. Throughout, Metro Parks is guided by a two-fold mission: to manage our resources and to provide an experience for our visitors. This approach emphasizes Metro Parks' commitment to the conservation of resources within open spaces through cultivation of biological diversity and the protection of habitats in central Ohio.

In the pursuit of this mission, Metro Parks maintains a vast majority of its holdings in a naturalized state, thus promoting all the natural processes that lend toward keeping our natural water resources clean. However, to accommodate the experience for their visitors, there are a limited number of areas that have been developed. It is for these areas that this plan describes the approach that Metro Parks takes to ensure that stormwater runoff entering into the streams, rivers, ponds and wetlands in and around the parks remain as pollutant free as possible.

Stormwater runoff is generated when precipitation from rain and snowmelt events flow over land or impervious surfaces and does not percolate into the ground. As runoff flows over the land or impervious surfaces (paved streets, parking lots, building rooftops), it can accumulate debris, chemicals, sediment and other pollutants that could adversely affect water quality if the runoff is discharged untreated.

The intent of the Stormwater Management Program and the IDDE Plan are to provide for the health, safety and general welfare of the visitors to Metro Parks by protecting (and improving when possible) surface water resources within its holdings. To this end, the objectives of this IDDE Plan and related documents is: to prohibit illicit discharges and illegal connections to the MS4; and to carry out inspections, monitor procedures, and take enforcement actions necessary to ensure compliance with this regulation. These regulations apply to all lands in Metro Parks, except for those discharges exempted from regulation.

Enacted Stormwater Legislation and Legal Authority

Clean Water Act (federal law)

A complete copy of Chapter 26 of Title 33 of the United States Code, also known as the Clean Water Act, is available through: https://www.govinfo.gov/content/pkg/USCODE-2018-title33/pdf/USCODE-2018-title33-chap26.pdf · In addition, a brief history is provided by United States Environmental Protection Agency: http://www2.epa.gov/laws-regulations/summary-clean-water-act

Ohio Revised Code (state laws)

The following is a list of Ohio Revised Code chapters related to programs in the Division of Surface Water. These chapters can be referenced or downloaded from http://codes.ohio.gov/.

ORC Chapter 3745: Environmental Protection Agency
Creates and establishes powers of the Ohio EPA

ORC Chapter 6111: Water Pollution Control
Specifies powers of the Ohio EPA with regard to water pollution control

Local Controls Related to Stormwater

Untreated sewage - see Ohio RC 3701.59

Interference with sewage flow - see Ohio RC 4933.24

Local law enforcement as defined in ORC 2935.03 can enforce ORC 6111

Franklin County Public Health Regulation 106

MS4 Mapping

Metro Parks has worked cooperatively with Franklin Soil and Water Conservation District (FSWCD) to develop comprehensive mapping as required by the permit. Metro Parks maintains a park system-wide GIS that includes outfalls and other MS4 components, post construction BMPs (public, private and including the type of BMP back to 2003) and surface water features. Mapped MS4 components are updated as additions or repairs occur throughout the park system. The use of GIS has allowed these MS4 components to be visualized with the abundance of other GIS data the park maintains related to trails, natural resources and amenities within the parks. This integration allows for a holistic view of the park holdings as well as identifying the locations where stormwater flows move across adjacent municipal boundaries.

Metro Parks maintains their MS4 related mapping within an online environment to allow for access by applicable staff personnel and contractors. This online mapping can be accessed via: *https://fca.maps.arcgis.com/apps/instant/basic/index.html?appid=85ceab54c97a4b97b46feeebe3b2bc73*

Dry Weather Screening (DWS)

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

DWS entails recording a variety of characteristics for each feature screened, including a physical description of the drainage feature, and any indicators suggesting an illicit discharge. GIS mobile applications are used to record the location and descriptive information of the features. This data is then processed, analyzed and mapped utilizing GIS. The analysis assists in determining which drainage features are likely to contain illicit discharges.

The groups of features screened during this process are:

Flowing Pipes: outfalls with flow at the time of screening

Note: outfalls with flow within catch basins are included in this group

Non-Flowing Pipes: outfalls with no flow at the time of screening

Note: outfalls without flow within catch basins are included in this group

Flowing Channels: constructed or man-made channels with flow at the time of screening

Non-Flowing Channels: constructed or man-made channels without flow at the time of screening

Catch Basins: catch basins with or without flow at the time of screening

Generic Points: locations not fitting into the above categories, but which are of interest to stormwater management and illicit discharges: ie, seeps, unknown water sources, dump sites, etc.

In addition to the features dry weather screened, the locations of crossovers (drainage passing under roadways or structures), and manholes are collected to assist in verifying the MS4 components and the flow direction within the system.

Identifying Potential Illicit Discharges

Features are categorized by their potential to be a source of an illicit discharge and whether or not they are an obvious (severe) source of an illicit discharge. The criteria used to identify potentially illicit discharges are considered stand-alone indicators. These are odor, color, floatables, poor pool quality, benthic growth, and deposits and stains. The presence of at least one of these criteria can designate the outfall as potentially illicit. All suspected illicit discharges observed during the course of an employee's duties or during routine inspections warrant reporting through Metro Parks' chain of command and further investigation.

Dry Weather Screening and Trash Control

Metro Parks is currently undertaking an ongoing, park-rotation approach for the monitoring of their MS4 (see appendix A). All MS4 outfalls are screened at least once per permit term with any location identified as having a potential illicit discharge investigated to the furthest extent practical.

In addition to the ongoing dry weather screening, Metro Parks has established Maintenance Standards Procedures and Emergency Response Guidelines in place that all park staff adhere to. With this approach, there is near-continuous monitoring of Metro Parks' MS4 for any indications of pollution and ensures that all conveyances are free of trash, debris, erosion and encroachment of vegetation interfering with water flow.

If illicit sanitary cross connections from industrial, commercial, residential sources, or leaking/broken sanitary sewer lines are actively contributing sewage to Metro Parks' MS4, notifications must be made to the OEPA's Central District Office within 24 hours. The notification includes the location, general description, date, and approximate time the illicit discharge was discovered. Notifications can be made to: cdo24hournpdes@epa.ohio.gov

Identifying HSTS Connected to the MS4

To date, Metro Parks does not have any HSTS connected to their MS4. While the park system does maintain restroom facilities throughout their parks, those facilities are either connected to sanitary sewers or have associated in-ground systems which undergo regular maintenance and/or inspections.

FCPH has the authority to regulate sewage treatment systems (STS) under both Revised Code Chapter 3718.011 and Franklin County Public Health Regulation 106 (https://myfcph.org/wp-content/uploads/2018/03/106SewageTreatmentRegulation2015FINAL.pdf). While the park does not maintain any discharging systems, there are four in-ground systems that FCPH inspects on a yearly basis.

Prioritized Areas

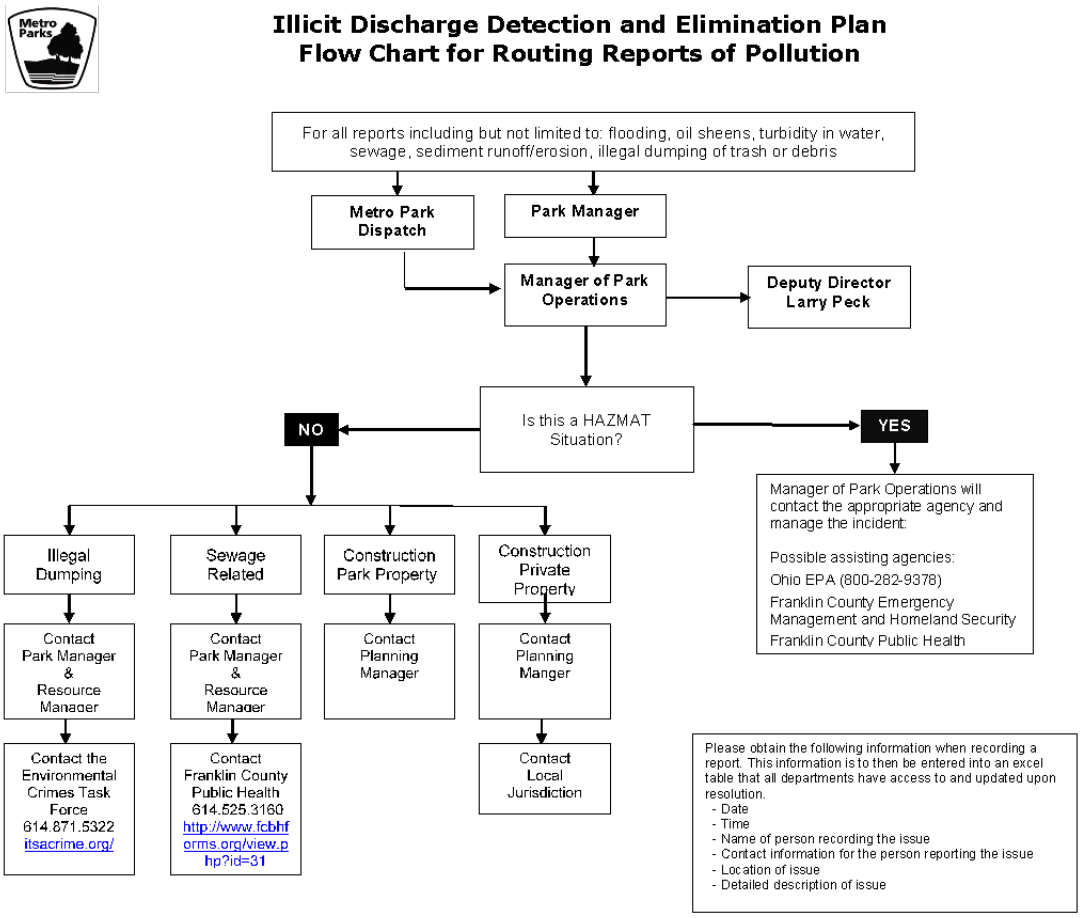
Through the years of operation, the largest source of pollution that park operations needs to address is litter from park visitors and surrounding communities. The most concentrated areas of this nuisance are around the parking areas, shelters, visitor centers, and within floodplains. To address this issue and prevent the litter from entering further into the environment, the following activities are undertaken on a regular basis: park staff conduct scheduled litter pickups twice a week throughout all parks and once a week along park trails; all park staff are instructed to pick up litter whenever it is seen; and grounds staff conduct regular inspections of all MS4 six components for stormwater conveyance including curb and gutter, catch basins and roadside ditches. Other efforts to address litter within Metro Parks includes the use of organized groups and court-appointed community service individuals.

Communication and Outreach

Success of the IDDE program depends on communicating processes to Metro Parks staff and the park visitors affected. The goal of this communication and outreach is for the staff and visitors to understand the IDDE program, why it is required and its purpose, who is responsible for its implementation, how it will be implemented, and how they can become part of the solution to stormwater issues. Metro Parks employees are provided yearly education on stormwater and pollution related topics by means of internal email notifications and good housekeeping trainings.

Reporting Illicit Discharges

The IDDE program benefits not only from the established protocols that Metro Parks has in place, but also from visitors reporting spills, illegal dumping, sewage and other observed pollution. There are various avenues available to the visitors of Metro Parks for reporting pollution complaints, including direct access to on-duty staff and Metro Parks dispatch operations via phone or through the Metro Parks website. For Metro Parks staff, their established protocol entails following a strict chain of command that quickly elevates reports to ensure an expedited response, investigation, and prosecution if applicable. This process is best represented by the following organizational chart:



Beyond reporting directly to Metro Parks, for the general public:

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

FCPH has an after-hours emergency phone number for emergency calls outside of business hours for chemical spills affecting MS4s at 614-525-3965. FCPH also provides on online form for sewage related complaints which can be found at: https://form.jotform.us/FCPH280/sewage-problem-or-sewage-discharge

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

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

Definitions and Initialisms Associated with this document

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

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

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

FCPH: Franklin County Public Health

FSWCD: Franklin Soil and Water Conservation District

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

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

Illicit Connection: any man-made conveyance connecting an illicit discharge directly to a municipal separate storm sewer (MS4)

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

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

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

Owned or operated by the federal government, state, municipality, township, county, district, or other public body (created by or pursuant to state or federal law) including special district under state law such as a sewer district, flood control district or drainage districts, or similar entity, or a designated and approved management agency under section 208 of the act that discharges into surface waters of the state; and designed or used for collecting or conveying solely storm water, which is not a combined sewer, and which is not a part of a publicly owned treatment works.

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

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

OEPA: Ohio Environmental Protection Agency

Sanitary Sewer: a pipe or conduit (sewer) intended to carry wastewater or water-borne wastes from homes, businesses and industries to the POTW.

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

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

TMDL: Total Maximum Daily Loads, a federal regulation implemented at the state and local level to identify and reduce nonpoint source pollutants. This program is still being developed at the state level and is not yet being enforced.

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

Dry Weather Screening (DWS) Schedule.

Dry Weather Screening at Metro Parks occurs on a yearly basis by the groups defined below. All outfalls are screened at least once every four years.				
Park Code(s)	**Park Name(s)**	**# of Outfalls**	**In Urbanized Area**	**Screening Schedule**
Group A				
BLN	Blendon Woods	36	X	2018, 2022, 2026
CHS	Chestnut Ridge	10		2018, 2022, 2026
CLC	Clear Creek	3		2018, 2022, 2026
GLR	Glacier Ridge	15		2018, 2022, 2026
HOM	Homestead		X	2018, 2022, 2026
HTG	Heritage Trail		X	2018, 2022, 2026
Group B				
SLR	Slate Run	*15*		2019, 2023, 2027
PKN	Pickerington Ponds	3	X	2019, 2023, 2027
INS	Inniswood	23	X	2019, 2023, 2027
RKY	Rocky Fork	15		2019, 2023, 2027
POK	Prairie Oaks	9		2019, 2023, 2027
Group C				
BLK	Blacklick Woods	17	X	2020, 2024, 2028
BDC	Battelle Darby Creek	31		2020, 2024, 2028
TCR	Three Creeks	4	X	2020, 2024, 2028
SIO	Scioto Audubon	9	X	2020, 2024, 2028
QUT	Quarry Trails		X	2020, 2024, 2028
Group D				
HBK	Highbanks	21	X	2021, 2025, 2029
SHN	Sharon Woods	35	X	2021, 2025, 2029
WAL	Walnut Woods	8		2021, 2025, 2029
SGR	Scioto Grove	4	X	2021, 2025, 2029

APPENDIX C:

STORMWATER POLLUTION PREVENTION PLAN

Appendix C

Stormwater Pollution Prevention Plan

Latest Revisions: February 2025

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Contents

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SECTION 1: BACKGROUND AND PURPOSE

1.1 Permit Requirements

This plan has been prepared to satisfy the Ohio Environmental Protection Agency (OEPA) *General Permit for Discharges of Storm Water from Small Municipal Separate Storm Sewer Systems (OHQ000004)*, which Columbus & Franklin County Metro Parks (Metro Parks) currently has coverage under permit #4GQ00020*DG.

This permit requires Metro Parks to develop and implement Stormwater Pollution Prevention Plans (SWPPPs) in accordance with the most current *OEPA Industrial Storm Water General Permit (OHR000007)* for any Metro Parks facilities that conduct activities described in 40 CFR 122.26(b)(14). Most commonly, these activities include vehicle maintenance, fueling stations and storage of salt/brine.

This document has been completed in a format consistent with both permit requirements and will be updated as needed and when new permits are issued to remain in compliance.

1.2 Purpose of the Stormwater Pollution Prevention Plan (SWPPP)

To ensure practices and procedures are consistent across all Metro Parks facilities, and because all facilities conduct similar activities, it was determined one comprehensive plan made more sense than developing individual plans. A list of all facilities covered under this plan, along with site specific maps for each facility can be found in *Appendix A & B*.

The items listed below outline the purpose of the plan, with applicable information in the sections that follow.

1) Identify personnel that will be responsible for implementing pollution prevention practices, conducting periodic site inspections, and training onsite personnel.
2) Clearly indicate the location of existing stormwater systems on the sites.
3) Identify onsite and offsite activities that have the potential to generate stormwater pollution that are affiliated with these locations.
4) Document appropriate pollution prevention procedures to be used at these locations to reduce the potential for stormwater runoff pollution based on activities that are conducted.
5) Document periodic site inspection procedures.
6) Document procedures that are used to train onsite staff on stormwater pollution prevention practices.
7) Identify information that needs to be provided in the annual report to Ohio EPA.

SECTION 2: CONTACT INFORMATION & FACILITY DESCRIPTION

2.1 Stormwater Pollution Prevention Personnel

The stormwater pollution prevention team below is responsible for development and overall implementation of the SWPPP across all Metro Parks facilities. Please see *Appendix A* for site specific contacts.

Name, Title & Phone	Responsibilities
Kevin Kasnyik Resource Manager / Manager of Park Operations **Phone: 614-895-6239**	***Stormwater Coordinator, Spill Response, Training*** Signature authority; plan implementation, coordination, oversight and revisions; spill prevention & response activities; record keeping and reporting; site compliance inspections; employee training.
Park Managers See Appendix A	***Reporting, Response, Training*** Assist stormwater coordinator with all responsibilities described above; notes/records any process changes; performs regular site inspections; oversees good housekeeping and employee training efforts.
Assistant Park Managers See Appendix A	***Reporting, Response, Training*** Assist stormwater coordinator with all responsibilities described above; notes/records any process changes; performs regular site inspections; oversees good housekeeping and employee training efforts.

2.2 Inventory of Facility Activities

In order to select appropriate pollution prevention practices it is necessary to inventory the activities taking place on site to identify the potential pollutants associated with each and how those pollutants might interact with stormwater. The activities below have the potential to generate stormwater pollution and are applicable to most Metro Parks facilities (see *Appendix A & B* for site specific details).

1. Salt storage (seasonal storage of bagged material indoors and/or under cover)
2. Vehicle/equipment fueling (uncovered)
3. Vehicle/equipment maintenance/storage (indoors if not done off site)
4. Vehicle/equipment washing (indoors and outdoors)
5. Vehicle parking/storage (indoors and outdoors/uncovered)
6. Trash, recycling and/or other debris storage areas and dumpsters
7. Outdoor storage of miscellaneous materials
8. Storage/use of fertilizers, pesticides and herbicides
9. Material loading/unloading areas

2.3 General Location Map

A general location map, showing all Metro Parks facilities can be found in *Appendix B*.

2.4 Site Maps

Site maps for each facility have also been prepared and can be found in *Appendix B*. Each map includes the information listed below:

1. The location and extent of significant structures and impervious surfaces
2. Directions of stormwater flow
3. Locations of existing structural control measures
4. Indication of locations of receiving waters in the vicinity of the facility
5. Locations of stormwater conveyances including ditches, pipes, swales, inlets and outfalls
6. Locations of potential pollutant sources, ie loose aggregates; loose landscape materials permissible products; cleaning supplies; products related to the operation and maintenance of equipment
7. Locations of stormwater inlets and outfalls, with a unique identification for each outfall
8. Municipal separate storm sewer systems, where stormwater discharges to them
9. Locations of the following activities where such activities are exposed to precipitation
    a. Vehicle and equipment maintenance and/or washing areas,
    b. Vehicle parking/storage
    c. Loading and unloading

SECTION 3: POTENTIAL POLLUTANT SOURCES

3.1 Activities and Associated Pollutants

It is important to know where potential spills and leaks could occur at your site that could contribute pollutants to your stormwater discharge, and which outfall(s) are likely to be affected by such spills and leaks. The table below lists some of the common areas where spills/leaks cold occur, and outfall information for each facility can be found in *Appendix B*.

Areas of Site Where Spills/Leaks Could Occur		
Outdoor storage areas	Loading and unloading areas	Fueling stations
Dumpsters	Building entry and exit points	Washing areas

Activity	Associated Pollutants
Salt storage	Salt (chloride and additives)
Vehicle/equipment fueling	Oils, greases, gasoline, antifreeze
Vehicle & equipment maintenance/storage	Oils, greases, gasoline, antifreeze
Vehicle/equipment washing	Oils, greases, gasoline, antifreeze, TSS, heavy metals, surfactants, detergents, salts, phosphates, nutrients
Vehicle parking/storage	Oils, greases, gasoline, antifreeze
Trash, recycling and/or other debris storage areas and dumpsters	Various exposed items (solid materials washing off or materials dissolving into solution)
Outdoor storage of miscellaneous products or event materials	Various exposed items (solid materials washing off or materials dissolving into solution)
Outdoor storage of raw (erodible) materials	TSS or materials dissolving into solution
Trash, recycling and/or other debris storage areas and dumpsters	Various exposed items (solid materials washing off or materials dissolving into solution),TSS/miscellaneous organics
Loading/unloading areas	Various from materials being handled or pollutants from equipment being used to transport

3.2 Non-Stormwater Discharges

OEPA prohibits non-stormwater discharges to storm drains or receiving waters (excepting those authorized by Ohio EPA as listed in Metro Parks' Stormwater Management Plan found on MetroLink). Illicit connections that allow sanitary or any sort of wastewater to enter storm drains are strictly prohibited, including storm drain connections from indoor drains or sinks. Other non-stormwater discharges could occur from illegal dumping, fueling stations and fleet vehicle parking areas.

No unauthorized non-stormwater discharges were observed at any Metro Parks facilities during the creation of the SWPPP and corresponding site maps. Measures to prevent non-stormwater discharges can be found in Section 4.9.

Authorized or non-applicable discharges of non-storm water sources to Metro Parks MS4 may be found in the Stormwater Management Plan.

3.3 Salt Storage

There are no salt barns or brine tanks at any Metro Parks facilities. However, seasonal salt storage does take place with palletized, bagged material that is stored indoors or undercover. Refer to Section 4.7 and the Site Maps in *Appendix B* for details.

SECTION 4: STORMWATER CONTROL MEASURES

4.1 Minimize Exposure

The BMPs below will be utilized to minimize the exposure of outdoor materials storage and handling activities to rain, snow, snowmelt and runoff. Note that salt storage is specifically addressed in section 4.7.

1. Erodible bulk material stockpiles will be placed on paved surfaces away from roof runoff or areas where water may pond (whenever possible). Other controls (silt fence, sediment traps, berms, etc) may be utilized for further protection as needed.
2. After any loading or unloading activities, the area will be inspected and swept as needed to remove fines that may wash out of the materials.
3. Dumpsters will be kept in good condition, with lids closed. Containers will be inspected regularly for damage or leaks.

4.2 Good Housekeeping

The following good housekeeping practices, in addition to section 4.1 items, will be implemented on a regular basis:

1. Site and facility clean-up will be completed without water whenever possible, by sweeping or wiping.
2. Rooftop drains or downspouts will be arranged so they don't drain directly onto paved surfaces wherever possible.
3. The storm sewers will be kept clear of debris and litter to avoid blockage that may cause storm water to back up and to avoid the discharge of illicit materials.
4. Storm drain inlets will be regularly inspected and cleaned as needed to remove sediment and debris.

5. Maintenance of equipment and vehicles will be conducted under cover (in the buildings) or off-site. If any maintenance is conducted on-site, any used fluids generated will be recycled or disposed of in an approved manner.
6. Whenever possible, washing of equipment and vehicles shall be done at a commercial washing facility or in a wash bay, undercover, where the conveying system is intercepted by an oil/water separator prior to discharge to the sanitary system.
    - When washing of vehicles and equipment needs to occur outdoors, BMPs should be implemented including the use of"green" cleaning chemicals, only water (without detergents), OR measures taken to prevent discharge of wash water to surface inlets and waterbodies (the use of berms, vegetated filter strips and gravel wash areas may be utilized to this end).
    - Reference USEPA document: Stormwater Best Management Practice for Municipal Vehicle and Equipment Washing for further considerations:

    https://www.epa.gov/system/files/documents/2021-11/bmp-municipal-vehicle-and-equipment-washing.pdf

4.3 Maintenance

Metro Parks staff perform regular inspections, testing, and preventive maintenance/repair of stationary and mobile equipment to ensure that it is kept in good operating condition. This helps to prevent or minimize leaks and other releases of pollutants. As soon as a leak is noted, the equipment should be taken out of service and the leak(s) reported to the appropriate maintenance personnel. The equipment should not be put back in service until all repairs to fix the leak have been made.

The oil/water separators are inspected once every 24 months and necessary maintenance performed. Oil/water separator locations are denoted on individual facility site maps attached as Appendix B.

Maintenance of any additional site control measures will be determined by the frequency and intensity of rainfall events, and activities taking place at the facility. Specific maintenance requirements for each individual BMP will be determined during inspection activities as outlined in section 5 of this SWPPP.

4.4 Spill Prevention and Response

Regardless of how well a SWPPP is written and enforced, spills and/or leaks may still occur. Therefore, spill prevention and response procedures are critical in reducing the likelihood of spills and minimizing the impact of spills and/or leaks on human health, the environment, and liabilities. The following procedures are recommended to prevent spills from occurring and for use in the event a spill occurs.

4.4.1 Spill Prevention

The most important practices used in any effective spill control plan are those that prevent a spill from occurring in the first place. Spills are often the result of improper storage and handling of materials and inadequate protection of the stormwater system from spilled materials. Applicable to Metro Parks, materials include: loose aggregates; loose landscape materials; permissible products; cleaning supplies; products related to the operation and maintenance of equipment. The following practices may be followed to reduce the likelihood of a spill from occurring onsite or in the field.

1. If possible, move material handling indoors, under cover, or away from storm drains or sensitive water bodies.
2. Properly label all containers so that the contents are easily identifiable.
3. If possible, berm storage areas so that if a spill or leak occurs, the material is contained.
4. If possible, cover outside storage areas either with a permanent structure or with a seasonal one such as a tarp so that rain cannot come into contact with the materials.
5. Check containers (and any containment sumps) often for leaks and spills. Replace containers that are leaking, corroded, or otherwise deteriorating with containers in good condition. Collect all spilled liquids and properly dispose of them.
6. Store, contain and transfer liquid materials in such a manner that if the container is ruptured or the contents spilled, they will not discharge, flow or be washed into the storm drainage system, surface waters, or groundwater.
7. Place drip pans or absorbent materials beneath all mounted taps and at all potential drip and spill locations during the filling and unloading of containers. Any collected liquids or soiled absorbent materials should be reused/recycled or properly disposed of.
8. Sweep and clean storage areas monthly. Do not use water to hose down the area unless all of the water will be collected and disposed of properly.
9. If necessary, protect catch basins while conducting activities so that if a spill occurs, the material will be contained.
10. Educate employees about spill prevention, spill response and cleanup on a routine basis. Fueling station procedures can be found in section 4.9.
    a. Training of staff from all departments should focus on recognizing and reporting potential or current spills/leaks and who they should contact.
    b. Store and maintain appropriate spill cleanup materials in a clearly marked location near storage areas; and train employees to ensure familiarity with the site's spill control plan and/or proper spill cleanup procedures.
    c. Locate spill cleanup materials, such as absorbents, where they will be readily accessible (eg near storage and maintenance areas, fueling stations, on field trucks).

d. Employees responsible for above ground storage tanks and liquid transfers for large bulk containers should be thoroughly familiar with the Spill Prevention Control and Countermeasure Plan and the plan should be readily available.

4.4.2 Spill Notification

Once a spill has been detected at a facility, the Metro Parks dispatcher and site specific park manager or assistant park manager shall be notified immediately followed by notification of the stormwater coordinator.

Name, Title & Phone	Responsibilities
Kevin Kasnyik Resource Manager / Manager of Park Operations **Phone: 614-895-6239**	***Stormwater Coordinator*** | ***Spill Response*** | ***Training*** Signature authority; plan implementation, coordination, oversight, and revisions; spill prevention & response activities; record keeping and reporting; site compliance inspections; employee training.
Park Manager See Appendix A	***Reporting, Response, Training*** Assist stormwater coordinator with all responsibilities described above; notes/records any process changes; performs regular site inspections; oversees good housekeeping and employee training efforts.
Assistant Park Manager See Appendix A	***Reporting, Response, Training*** Assist stormwater coordinator with all responsibilities described above; notes/records any process changes; performs regular site inspections; oversees good housekeeping and employee training efforts.

After the stormwater coordinator has been notified:

1. Mobilize the pollution prevention personnel and other staff necessary to assist with the spill response procedures.
2. The stormwater coordinator will use the Spill Report Form (included in *Appendix C*) to notify the applicable outside authorities (Ohio EPA etc), where necessary, after consultation with on scene staff.
3. The source of the spill should be determined, and corrective actions should be taken to address the source of the spill in accordance with Section 4.4.3 below.

Ohio EPA Notification Requirements

If the spill may be of significant impact, it may also be necessary to contact the Ohio EPA's Spill Hotline (1-800-282-9378). In the case of petroleum related spills (diesel fuel, gasoline, hydraulic fluid etc), it is required to call the hotline if any amount of petroleum causes a film or sheen on a waterway, or if any spill or release not contained on the facility is greater than 25 gallons. If

the volume of spill is not clearly known, reporting is encouraged. Spills of petroleum products of 25 gallons or more on or adjacent to a public roadway are always reportable. Ohio EPA encourages responders to report petroleum spills of any amount if the spill threatens a waterway or will enter a waterway or storm sewer in the future due to rain or snowmelt if unaddressed.

4.4.3 Spill Containment Procedures

Corrective actions should only be performed by individuals who have been trained in spill assessment and cleanup. Trained individuals should take prompt action to contain the spill, thereby limiting the potential hazard to human health and the environment.

Methods of containment include, but are not limited to:

1. If safe to do so, attempt to contain the material and block the nearby storm drains so that the area impacted is minimized. The following methods may be used to contain a spill:
    a. Dikes of earth, sand bags or absorbents may be used to contain the spill at its source.
    b. Absorbent booms can be used to contain liquids floating on the surface of flowing water.
    c. Covers or berms can be used over or around catch basins, trench drains and other means of entrance to the storm system to prevent material from entering the storm system.
2. The applicable fire department and/or Ohio EPA should be notified in instances where the material is unknown or hazardous, or containment efforts are unsafe or exceed the capability of onsite personnel and equipment (see *Ohio EPA Notification Requirements* under section 4.4.3 above).
3. Perform an assessment of the area where the spill occurred and the downstream area that it could impact. Relay this information as directed in Section 2.1.

4.4.4 Spill Cleanup Procedures

The Material Safety Data Sheet (MSDS) for the spill material should be reviewed prior to spill clean-up activities. Section 6 of each MSDS, Accidental Release Procedures, identifies the proper spill response. Locations of data sheets and spill kits for each facility can be found in *Appendix A & B*.

The technique used to collect a spill will depend on the type of material, location and magnitude of the spill. However, the following general procedures are recommended:

Small non-hazardous spills

1. Do not touch spilled material unless wearing appropriate personal protective equipment (PPE).
2. Use a rag, damp cloth or absorbent materials for general cleanup of liquids.
3. Use brooms or shovels for the general cleanup of dry materials.
4. If water is used, it must be collected and properly disposed of. The wash water cannot be allowed to enter the storm drain.
5. Dispose of any waste materials properly.
6. Clean or dispose of any equipment used to clean up the spill properly.

Large non-hazardous spills

1. Do not touch spilled material unless wearing appropriate PPE.
2. Use absorbent materials for general cleanup of liquids.
3. Use brooms, shovels or street sweepers for the general cleanup of dry materials.
4. If spill is large enough, transfer spilled liquid to salvage or disposal tank. Remaining liquid may be absorbed by sand, clay, floor absorbent or other inert absorbent material and shoveled into containers for later disposal.
5. If water is used, it must be collected and properly disposed of. The wash water cannot be allowed to enter the storm drain.
6. Dispose of any waste materials properly.
7. Clean or dispose of any equipment used to clean up the spill properly.

Hazardous or very large spills

For hazardous or very large spills, Metro Parks Emergency Response Guidelines should be followed.

If the spilled material is hazardous, then the used cleanup materials are also hazardous and must be sent to a certified laundry (rags) or disposed of as hazardous waste.

4.4.5 Post-Spill Procedures

Complete a Spill Response Report (*Appendix C*) and file it in the SWPPP. If verbal notification to Ohio EPA is required, a written report of the spill incident must be submitted to Ohio EPA within five days as well. The Spill Response Report may be used for this purpose.

4.5 Erosion and Sediment Controls

Structural or non-structural controls will be utilized as needed to stabilize exposed areas and contain runoff to minimize onsite erosion and potential offsite discharges of sediment.

4.6 Management of Runoff

All Metro Parks facilities strive to divert, infiltrate, reuse, contain, or otherwise reduce stormwater runoff to the extent practical. Refer to the individual site maps in *Appendix B* for details.

4.7 Salt Storage

While there are no salt barns or brine tanks at any Metro Parks facilities, seasonal storage of bagged salt and other deicing products does occur.

To prevent stormwater contamination from these operations, material will be stored in supply closets or on pallets indoors or undercover to prevent contact with stormwater runoff. Any spilled material will be swept up for reuse.

4.8 Employee Training

Successful stormwater pollution control is primarily a result of proper training and education of employees. Employee training will emphasize the importance of keeping pollutants out of the storm drains and understanding/implementing the BMPs that apply to operations at each facility.

Facility personnel will continue to be informed of the harmful environmental effects of improper disposal of materials into storm drains and an emphasis will be placed on understanding the importance of preventing stormwater pollution, as well as practices for identifying and reporting any illicit discharges.

The following training will be implemented by Metro Parks:

1. Experienced staff and other trained personnel will be used to train facility employees.
2. Training will be completed and documented once per year for all appropriate staff.
3. All current staff will be required to read and understand the current SWPPP.
4. New staff will be required to review and understand this document prior to beginning significant work activities.

4.9 Non-Stormwater Discharges

Facility Operations

No unauthorized non-stormwater discharges were observed at any Metro Parks facilities during the creation of the SWPPP and all interior floor drains are connected to sanitary sewer and utilize oil/water separator tanks where needed.

Metro Parks will utilize routine inspection procedures and staff training in an ongoing effort to make sure that no illegal discharges occur at park facilities.

Illegal Dumping

An additional type of prohibited discharge is illegal dumping. Pollutants from illegal dumping may be introduced to storm drains inadvertently, by routine practices that discharge water outdoors, or they may be released intentionally by trespassers or by staff with a lack of understanding in proper procedures.

Fueling Stations

All Metro Parks facilities have on-site, above ground fueling stations (refer to site maps in *Appendix B* for details). All tanks are double-walled and/or have secondary containment in place, along with protective barriers or bollards to help prevent accidental impacts from vehicles and equipment. Adding canopies or other covers to fueling stations would help limit exposure and may be implemented as future funding is made available.

Any facilities that have a total above ground oil capacity of 1,320 gallons or more (excluding containers less than 55 gallons) on site will also develop a Spill Prevention, Control and Countermeasure (SPCC) plan as required by Ohio EPA.

The following BMPs will be implemented to reduce the risk of an accidental release:

1. Inspect secondary containment structures regularly.
2. Clean the fueling station using dry methods (spot cleaning with absorbents or mechanical sweepers). Do not clean fueling island with water/detergents, and do not wash any spills into the storm drain.
3. Personnel responsible for fueling vehicles will be included in training program, including spill response procedures.
4. Fueling personnel are instructed to avoid overtopping fuel tanks and stay with the vehicle while fueling. Automatic back pressure shut-off to be maintained to prevent overfilling of fuel tanks.
5. Suitable cleanup materials/spill kits will be kept on site for prompt cleaning of all spills per the spill response plan (Section 4.4).

Vehicle Parking

The parking lots at each facility are utilized by various staff and park visitors.

Parked vehicles on pavement can contribute pollutants to the storm system and receiving waters by way of leaking fluids (containing hydrocarbons, metals and other toxic materials). Heavily soiled automobiles may also drop soils and other debris onto the parking surface, contributing to the sediment load when runoff is present. These pollutants may be carried into the storm drain system or groundwater during rain events.

BMPs to avoid pollutants from parked vehicles include:

1. Vehicle fluid leaks should be repaired as soon as practical. Until repairs are made, place a collection device (pan or other container) under leak to collect fluids. Collected fluids must be disposed of properly.
2. Leaked material on impervious surfaces should be cleaned using a dry cleaning agent and/or absorbent material. Water should not be used to remove oil stains or other vehicle fluids.
3. Vehicles that will be stored for nine months or longer should be drained of all fluids and properly disposed of as soon as practical.

4.10 Waste, Garbage and Floatable Debris

Frequent inspections will be performed, and immediate steps will be taken to clean areas to minimize potential discharges of waste, garbage and floatable debris. The areas to be inspected include:

1. Miscellaneous uncovered storage
2. Dumpster areas

These activities are included as part of Metro Parks' daily operations and inspection programs.

4.11 Dust Generation and Vehicle Tracking of Materials

Vehicle and truck traffic at most facilities is limited to paved areas. Any disturbed areas are vegetated as needed to maintain ground cover throughout the year. To reduce vehicle tracking of materials and sediment, the operators will keep stored or spilled materials away from all main travel paths within the site.

SECTION 5: INSPECTIONS

Routine Facility Inspections

Routine facility inspections will be conducted once each calendar quarter (at a minimum) of all areas where materials or activities are exposed to stormwater, and of all stormwater control measures. At least once each calendar year, the routine inspection shall be conducted during a period when a stormwater discharge is occurring.

Information reported will include:

- The inspection date, time and current weather conditions
- The name(s) and signature(s) of the inspector(s)
- Description of any discharges occurring at the time of the inspection
- Any previously unidentified discharges of pollutants from the site
- Any control measures needing maintenance, repairs or replacement
- Any incidents of noncompliance observed
- Any additional control measures needed to comply with the permit requirements

Visual Inspection of Stormwater Discharge

At least once each calendar year, the routine quarterly inspection shall be conducted during a period when a stormwater discharge is occurring. During this inspection a stormwater discharge sample will be collected and a visual assessment performed. The sample should be collected from an outfall or other identified location that will be most representative of site conditions. These locations are identified on each facilities site map in *Appendix B*.

All sampling shall be performed on a storm event that results in an actual discharge from the site ("measurable storm event") that follows the preceding measurable storm event by at least 72 hours (three days). The 72-hour (three-day) storm interval does not apply if you are able to document that less than a 72-hour (three-day) interval is representative for local storm events during the sampling period. In the case of snowmelt, the monitoring shall be performed at a time when a measurable discharge occurs at your site.

Samples will be collected within the first 30 minutes of an actual discharge from a storm event or as soon thereafter as practical. In the case of snowmelt, samples shall be taken during a period with a measurable discharge from the site.

Samples will be inspected for any observations of color, odor, turbidity, floating solids, foam, oil sheen, or other obvious indicators of storm water pollution. Information reported will include the inspection date, inspection personnel, visual quality of the storm water discharge, and probable sources of any observed storm water contamination.

Quarterly Inspection Sheets and Log Forms are included as part of *Appendix C*.

Annual Compliance Evaluation

Once a year, a review of the SWPPP and associated appendices should be conducted. The purpose of this review is to identify any updates that are needed to personnel, maps, procedures, etc. See Appendix C for the annual checklist and Section 6 below for additional guidance when modifications are needed.

SECTION 6: SWPPP MODIFICATIONS

This SWPPP is a "living" document and it will be modified and updated, as necessary, or in response to any corrective actions.

For any SWPPP modification, the Metro Parks will keep a log with a description of the modification, the name of the person making it, and the date and signature of that person.

Changes will be made to the plan under the following conditions:

1. The facility experiences changes in design, construction, O&M, or any other way that may impact the potential for pollution.
2. Spill response plans or procedures are changed.
3. Applicable local, state or federal regulations change.
4. Storage tanks are altered, removed, or new tanks installed.
5. The SWPPP proves to be ineffective or fails.
6. OEPA requires changes.

APPENDIX D:

STORMWATER MANAGEMENT PLAN – PLAN SPREADSHEETS

#	THEMES	TMDL Link	Abbreviation
1	Installing and Maintaining Proper Stormwater Management Controls	TP, TSS, E. coli	Stormwater Mgmt Controls
2	Stream Corridor Protection Measures	TP, TSS, E. coli	Stream Corridor Protection
3	Habitat Restoration	TP, TSS, E. coli	Habitat Restoration
4	Stormwater Awareness	TP, TSS, E. coli	Stormwater Awareness
5	Pollution Awareness	TP, TSS, E. coli	Pollution Awareness

MCM 1 PUBLIC EDUCATION AND OUTREACH

Program Evaluation: Success of this minimum measure will be determined by meeting the measurable goals and/or their tracking parameters as outlined in the table below. Each of the measurable goals were chosen based on their expected potential to meet stormwater permit requirements and consensus by staff responsible for implementing the program. As Metroparks is an organization that has the protection and improvement of natural resources as part of its core mission, as well as providing an excellent user experience and education to the public on these topics, it is believed that what is outlined below will more than adequately meet permit requirements. The primary emphasis in meeting the permit requirements is to ensure that our stormwater messaging continues and to ensure that the pollutants of concern related to TMDls are included in the messaging.

BMP	Measurable Goal	Mechanism	Activities Summary	Themes	TMDL	Schedule	Targeted Audience	Performance Metrics / Expected Reach	Tracking Parameter and Documentation	Responsible Party	ID #
Print and Digital Media	Inform 50% of park visitors over the five-year permit period of Metro Parks' storm water program by using a suite of print and digital media to touch on the five themes, the TMDL pollutants, and what individuals can do to protect and improve surface water quality.	e-newsletter, website, social media, signs, and displays	**Metro Parks News (e-Newsletter)** **a.** Provide newsletters by e-mail **b.** Include a stormwater topic in at least one newsletter article per year related to one of the SWMP themes.	One or more themes depending on article: 1. Stormwater Mgmt Controls 2. Stream Corridor Protection 3. Habitat Restoration 4. Stormwater Awareness 5. Pollution Awareness	TP, TSS, E. coli	Annually	General Public	Approx. 10,000 current subscribers	**a.** # of subscribers **b.** article topic **c.** copy of e-newsletter	Visitor Engagement Manager	**1-01**
			Website **a.** Publish articles on the "Metro Parks Blog" webpage. **b.** Include a stormwater topic in at least one blog post per year related to one of the SWMP themes.	One or more themes depending on article: 1. Stormwater Mgmt Controls 2. Stream Corridor Protection 3. Habitat Restoration 4. Stormwater Awareness 5. Pollution Awareness	TP, TSS, E. coli	Annually	General Public	Approx. 3,000 views per blog page.	**a.** # of hits on blog article **b.** article topic **c.** Copy of blog articles	Visitor Engagement Manager	**1-02**
			Social Media **a**. Provide social media posts through facebook, twitter, and/or instagram. **b.** Include a stormwater topic in at least one social media post per year.	One or more themes depending on topic: 1. Stormwater Mgmt Controls 2. Stream Corridor Protection 3. Habitat Restoration 4. Stormwater Awareness 5. Pollution Awareness	TP, TSS, E. coli	2-4 times per year during spring and/or fall	General Public	Approx. 13,000 Twitter followers, 50,000 Facebook followers, and 60,000 Instagram followers	**a**. # social media followers **b**. social media topics **c**. copy of post(s)	Visitor Engagement Manager	**1-03**
			Interpretive Signs **a.** Provide education through signs near wetlands and streams. **b**. Signs along streams address runoff, erosion, and relief. **c**. Signs near wetlands address the role wetlands play in water quality and flood control.	Stream Corridor Protection Habitat Restoration Stormwater Awareness	TP, TSS, E. coli	Ongoing	Park Visitors	Approx. 10% of park visitors will read interpretive signs along streams and wetlands	**a.** # of park visitors **b.** example/photo of a sign	Visitor Engagement Manager	**1-04**
Youth Education Programs	Provide stormwater education and resources to middle and high school students.	presentations, interactive displays, hands-on activities	**School Programs** **a.** Provide presentations and interactive activities for middle and high school students on stormwater and water quality topics through SQM programs and some use of the Enviroscape.	Stream Corridor Protection Habitat Restoration	TP, TSS, E. coli	Spring/ Summer/ Fall	Students	Approx. 4,500 students reached per year	**a.** # of students **b.** attendance log **c.** topics covered / description of program	Park Naturalists	**1-05**
Public Education Programs	Provide stormwater education and resources to to park visitors.	presentations, hands on activities	**Stream Quality Monitoring (SQM) Programs** **a.** Provide water quality education and hands on experience with stream quality monitoring for the public.	Stream Corridor Protection Habitat Restoration	TP, TSS, E. coli	Spring/ Summer/ Fall	Park Visitors	Approx 6,500 people reached per year	**a.** # attendees at programs **b.** attendance log **c.** topics covered/ description of program	Park Naturalists	**1-06**
			AND/OR: Wetland and Stream related programs **a.** Additional programs on wetland and stream related topics.	Stream Corridor Protection Habitat Restoration	TP, TSS, E. coli						**1-07**
Dog Waste Program "Pick Up Poop" (P.U.P.)	Provide stormwater education and information to pet owners visiting the parks.	flyers on bulletin boards	**Dog Waste Program "Pick Up Poop" (P.U.P.)** **a.** Provide education on the impact of pet waste on water quality through flyers posted on bulletin boards at dog parks as well as on dog bag dispensers on pet trails.	Stormwater Awareness Pollution Awareness	TP, E. coli	Year Round	Pet Owners	Approx. 5% of park visitors will see the flyers	**a.** # of bulletin boards with flyers/ # of dog parks **b.** # of people seeing the flyers (% of park visitors)	Park Managers	**1-08**
Stormwater Education for Tenants	Provide stormwater education to 100% of tenants of park rentals and life estates through annual mailing.	informational handout	**Annual Mailing** **a.** Send stormwater educational information to renters with annual mailing.	Stormwater Awareness Pollution Awareness	TP, TSS, E. coli	Annually	Tenants of rental properties and life estates	100% of tenants (approx. 10 residents)	**a.** # of letters mailed **b.** copy of letter	Visitor Engagement Manager	**1-09**
Green Infrastructure Education for Employees (see also MCM 5)	Provide education and training opportunities to support and facilitate green infrastructure/CGP Table 4b practices.	ongoing professional development opportunities	**Staff Education and Training** Provide education and training to park staff managing development sites through ongoing professional development opportunities.	Stormwater Mgmt Controls	TP, TSS, E. coli	Ongoing	park staff	100% of staff working on development sites in Metro Parks	**a.** summary of activites **b**. record of attendance for any trainings		**1-11**

MCM 2 PUBLIC INVOLVEMENT AND AND PARTICIPATION

Program Evaluation: Success of this minimum measure will be determined by meeting the measurables goals and/or their tracking parameters as outlined in the table below. Each of the measurable goals were chosen based on their expected potential to meet stormwater permit requirements and consensus by staff responsible for implementing the program. As Metroparks is an organization that has the protection and improvement of natural resources as part of its core mission, as well as providing an excellent user experience and education to the public on these topics, it is believed that what is outlined below will more than adequately meet permit requirements. The primary emphasis in meeting the permit requirements is to ensure that our stormwater messaging continues and to ensure that the pollutants of concern related to TMDls are included in the messaging.

BMP	Measurable Goal	Activities Summary	TMDL	Schedule	Targeted Audience	Estimate Number of People to Participate	Tracking Parameter and Documentation	Responsible Party	ID #
Park and Stream Clean Up Events	Organize and advertise at least one Clean Up Event, particularly around riparian areas, and collect trash for proper disposal.	**Park and Stream Clean-up** **a.** Provide park clean ups, particularly around riparian areas and collect trash for proper disposal. **b.** Advertise to the general public.	TP, TSS, E. coli	Annually	park visitors	Approx. 400 people total (approx. 40 per event)	**a.** # of participants **b.** attendance log	Park Naturalists	**2-01**
Tree Planting Events	Organize and advertise at least one Tree Planting Event annually.	**Tree Planting Event** **a.** Provide a tree planting event in conjunction with Earth Day at at least one park. **b**. Advertise to the general public	TP, TSS, E. coli	Annually	park visitors	Approx. 50 people	**a.** # of participants **b.** attendance log	Park Naturalists	**2-02**
Invasive Species Removal Events	Organize and advertise at least one Invasive Species Removal Event annually.	**Invasive Species Removal Events** **a.** Hold invasive removal events in conjunction with Earth Day. **b.** Advertise to the general public.	TP, TSS, E. coli	Annually	park visitors	Approx. 50 people	**a.** # of participants **b.** attendance log	Park Naturalists	**2-03**
Stream Quality Monitoring	Provide Stream Quality Monitoring programs and training locations for the public, school groups and youth groups.	**SQM Public Programs** **a.** Provide water quality education and hands on experience with stream quality monitoring for the public.	TP, TSS, E. coli	Seasonally	park visitors	Approx 6,500 people	**a.** # of participants **b.** attendance log	Park Naturalists	**2-04**
		SQM School Initiatives **a.** Work with Hilliard City Schools' six graders to monitor stream quality in the Big Darby Creek and turn results into ODNR.	TP, TSS, E. coli	Annually	students	Approx. 500 students	**a.** # of students **b.** attendance log	Park Naturalists	**2-05**
		SQM Training Location **a.** Provide training locations for Scenic Rivers SQM volunteers.	TP, TSS, E. coli	Annually	Scenic Rivers volunteers	Approx. 20 people at each event.	**a.** # volunteers at training **b.** attendance log	Park Naturalists	**2-06**
Dog Waste Program "Pick Up Poop" (P.U.P.)	Provide pet waste stations at all parks with dog trails and dog parks to encourage park visitors to pick up pet waste and properly dispose.	**Pick Up Poop (PUP) Program** **a.** Provide free pet waste bags and disposal stations at dog parks and pet trails for pet owners to clean up after their dogs.	TP, E. coli	Ongoing	Pet owners	Approx. 96,000 dog waste bags distributed	**a.** # bags provided at parks	Park Managers	**2-07**
Volunteers	Provide volunteer program for groups or individuals that supports park staff in natural resource management.	**Volunteer Group Events** **a.** Organize invasive removal and/or park clean up events for groups requesting volunteer opportunities, such as scout groups, corporate groups, etc.	TP, TSS, E. coli	Ongoing	Volunteers	Approx. 300 volunteers total (approx. 15 per event)	**a.** # events **b.** # volunteers participating in volunteer events	Park Naturalists	**2-08**
		Individual Volunteers **a.** Organize regularly scheduled volunteers that assist with natural resource management.	TP, TSS, E. coli	Ongoing	Volunteers	Approx. 75 volunteers for natural resource management	**a.** # volunteers **b.** # hours volunteered	Park Naturalists	**2-09**
Public Input	Provide an opportunity for and consideration of public input into storm water management plan.	**Website** **a.** Make the stormwater management plan available for public comment on the website **b.** Include contact information for the public to reach out to with any questions or comments.	TP, TSS, E. coli	Target to post the SWMP on the website after it is finalized, approx. spring 2023	General public	Approx. 5 people comment on SWMP	**a.** # of residents who comment on the stormwater plan **b.** # website views	Visitor Engagement Manager	**2-10**
		Park Board Meetings **a.** Invite public comment on the stormwater plan during Park Board meetings, which are open to the public. **b.** Include on board meeting agenda once per permit term.	TP, TSS, E. coli	Once per permit term	General public	Approx. 20 people attend board meetings	**a.** # of people at the park board meeting **b.** copy of meeting minutes	Steve Studemen (Planning and Design Dept)	**2-11**

MCM 3 ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDDE)

Program Evaluation: Success of this minimum measure will be determined by meeting the measurables goals and/or their tracking parameters as outlined in the table below. Each of the measurable goals were chosen based on their expected potential to meet stormwater permit requirements and consensus by staff responsible for implementing the program. As Metroparks is an organization that has the protection and improvement of natural resources as part of its core mission, as well as providing an excellent user experience and education to the public on these topics, it is believed that what is outlined below will more than adequately meet permit requirements. A vast majority of the land owned and operated by Metroparks is maintained in a natural state and is undeveloped. While there are relatively small areas that have been developed, it has always been the practice of Metroparks to maintain clean and properly functioning infrastructure both for the protection of natural resources and for a positive experience of his visitors.

BMP	Measurable Goal	Activities Summary	Schedule	Tracking Parameter and Documentation	Responsible Party	ID
Ordinance or Other Regulatory Mechanism	Prevent illicit discharges through enforcement of Metro Parks Rules 2.1, 18.8 & 18.9.	**a.** Continue to enforce Metro Parks rules 2.1, 18.8 & 18.9 and ORC 3767.32A **b.** Review Metro Parks Rules 2.1, 18.8 & 18.9 making sure that they are compliant with Ohio EPA requirements and update as necessary	Ongoing	**a.** Completed Y/N **b.** Effective Y/N **c.** Copy of rules	Park and Assistant Park Managers, Park Rangers	**3-01**
Storm Sewer System Map	Maintain comprehensive storm sewer map showing location of outfalls and names and location of surface waters receiving discharges from these outfalls including catch basins, pipes, ditches, flood control facilities, post construction BMP's and private post-construction BMP's, identifying BMP types	**a.** Maintain comprehensive storm sewer map and update as systems are added/changed **b.** Show location of outfalls and names and location of surface waters receiving discharges from these outfalls **c.** Include catch basins, pipes, ditches, flood control facilities, post construction BMP's, private post-construction BMP's.	As systems are added/changed	**a.** Completed Y/N **b.** Effective Y/N **c.** Summary of Activities **d.** Copy of Map	Park Managers, GIS Specialist	**3-02**
HSTS Mapping and List	Maintain and update a HSTS map and list using GIS.	Maintain HSTS map and list and update when changes/additions are made.	As systems are added/changed	**a.** Completed Y/N **b.** Effective Y/N **c.** Summary of Activities **d.** Copy of Map and List	Park Managers, GIS Specialist	**3-03**
IDDE Plan	A completed, stand alone, updatable plan that serves as a reference and guide for monitoring Metro Park's MS4 for dry weather flows and illicit discharges.	**a.** Update and maintain a plan to detect and eliminate non-storm water discharges, including illegal dumping to the MS4. **b.** Park Employees conduct routine patrol, boundary checks, and day to day grounds maintenance activities. Annual water quality monitoring program covering multiple parks. All illicit discharges detected are immediately addressed utilizing established chain of command.	Update the plan in 2023; Conduct activities annually	**a.** Completed Y/N **b.** Effective Y/N **c.** Summary of Activities **d.** Copy of Plan	Park Managers, Assistant Park Managers, Park Technicians, Aquatic Ecologist	**3-04**
Dry-Weather Screening of Outfalls	Dry weather screening at locations that had been identified the previous year as having potential or obvious illicit discharges and approximately 20% the total MS4 outfalls.	Continue with long-term surveillance of outfalls via dry weather screening. As new park land is acquired, new outfall locations will be updated, mapped and evaluated.	Ongoing	**a.** Completed Y/N **b.** Effective Y/N **c.** # Outfall Screened **d.** # of Dry Weather Flows Identified **e.** # of Illicit Discharges Identified / Eliminated	GIS Specialist & Aquatic Ecologist	**3-05**
Report Sanitary Sewage Discharges to Ohio EPA	Illicit sanitary sewer cross connections, or leaking or broken sanitary sewer lines actively contributing sewage to the MS4 will be reported to the Ohio EPA at *cdo24hournpdes@epa.ohio.gov* within 24 hours after detection	Report sanitary sewage discharges to the Ohio EPA within 24 hours after detection	As needed	**a.** # of detections **b.** # and timing of reports to OEPA	Park and Assistant Park Managers, Park Rangers	**3-06**
IDDE Training for Employees (see also MCM 6)	Employees will know how to recognize and report stormwater pollution to Franklin County Public Health and Ohio EPA as appropriate.	Educate employees on how to recognize and report pollution though annual good housekeeping trainings.	Annually	See MCM 6	Manager for Park Operations, Resource Manager	**3-07**

MCM 4 CONSTRUCTION SITE STOMWATER RUNOFF CONTROL

Program Evaluation: Success of this minimum measure will be determined by meeting the measurables goals and/or their tracking parameters as outlined in the table below. Each of the measurable goals were chosen based on their expected potential to meet stormwater permit requirements and consensus by staff responsible for implementing the program. As Metroparks is an organization that has the protection and improvement of natural resources as part of its core mission, a vast majority of the land owned and operated by Metroparks is maintained in a natural state and is undeveloped. While there are relatively small areas that undergo construction, it has always been the practice of Metroparks to protect and improve the natural areas around any development and these projects are managed accordingly by park staff.

BMP	Measurable Goal	Standards and/or Activities Summary	Schedule	Tracking Parameter and Documentation	Responsible Party	ID
Ordinance or Other Regulatory Mechanism	Eliminate/reduce construction site storm water pollution/runoff through a Regulatory Mechanism that requires erosion and sediment controls, and non-sediment pollutant controls, at construction sites disturbing more than one acre and in compliance with the General Construction Permit.	**a.** Update the Metro Parks Rules and Regulations to include requirements for sediment and erosion controls, and non-sediment pollutant controls, at construction sites. **b**. Enforce Rules and Regulations at construction sites disturbing more than one acre. **c**. Review Rules and Regulations annually and update as needed.	Update in 2023; Review Annually	**a.** Completed Y/N **b.** Effective Y/N **c.** Cite policy/procedures being used.	Planning and Design Manager, Metro Parks Project Manager & Co-Permittee Contractor	**4-01**
Sediment and Erosion Control Requirements	Eliminate/reduce construction site stormwater runoff/pollutants through enforcement of sediment and erosion control requirements.	**a.** Enforce requirements for sediment and erosion controls at construction sites disturbing more than one acre. **b**. Use sediment and erosion control standards from the Rainwater and Land Development Manual and the current Ohio EPA General Construction Permit.	Ongoing	**a.** Completed Y/N **b.** Effective Y/N **c.** Cite policy/procedures being used.	Planning and Design Manager, Metro Parks Project Manager & Co-Permittee Contractor	**4-02**
Complaint Process	Resolve & address construction site complaints/issues in a timely manner	Investigate, resolve and address complaints	As needed	**a.** # of Complaints received **b**. # of Complaints followed-up on	Planning and Design Manager, Metro Parks Project Manager, Co-Permittee Contractor, Metro Parks Consultants	**4-03**
Site Plan Review Procedures	Review site plans to ensure compliance with all standards & permit conditions when construction disturbs more than one acre.	**a.** Construction plans reviewed for natural resource concerns including soils, drainage, and stream buffers **b.** Construction plans reviewed with checklist for issues related to soil erosion and sediment control practices as well as construction sequence **c.** Ensure approved plan is in place before construction begins	As established in NPDES plan per project	**a.** # and location of applicable sites requiring plans **b.** # of plans reviewed **c.** Checklists completed and filed	Planning and Design Manager	**4-04**
Site Inspection Procedures	Inspect construction sites over one acre to prevent stormwater pollution/runoff.	**a.** Site inspections performed with checklist during active construction biweekly and within 24 hours of a 0.5" or greater rainfall. **b**. Monthly inspections performed on non-active, complying construction sites. **c.** Necessary changes recommended to appropriate developer representative **d.** Additional site inspections performed as necessary to ensure compliance **e.** Guidelines followed to ensure enforcement at noncompliant sites	As established in NPDES plan per project	**a.** # and location of applicable sites **b.** # of inspections performed **c.** Average frequency **d.** Inspection forms completed and filed	Planning and Design staff or designated park staff, Metro Parks Project Manager, Co-Permittee, Consultants	**4-05**
Enforcement Procedures	Enforce terms of NPDES permit & contract	Enforce terms of NPDES permit & contract	As established in NPDES plan per project and additionally emphasized to	**a.** # of Violation Letters **b.** # of Enforcement Actions **c.** Summary of Results	Metro Parks Project Manager, Co-Permittee, Consultants	**4-06**

MCM 5 POST CONSTRUCTION STORMWATER MANAGEMENT IN NEW DEVELOPMENT AND REDEVELOPMENT

Program Evaluation: Success of this minimum measure will be determined by meeting the measurables goals and/or their tracking parameters as outlined in the table below. Each of the measurable goals were chosen based on their expected potential to meet stormwater permit requirements and consensus by staff responsible for implementing the program. As Metroparks is an organization that has the protection and improvement of natural resources as part of its core mission, a vast majority of the land owned and operated by Metroparks is maintained in a natural state and is undeveloped. While there are relatively small areas that undergo construction, it has always been the practice of Metroparks to protect and improve the natural areas around any development for the integrity of its natural resources and a positive user experience and the long-management of stormwater controls aligns with these objectives.

BMP	Measurable Goal	Standards and/or Activities Summary	Schedule	Tracking Parameter and Documentation	Responsible Party	ID
Ordinances and other Regulatory Mechanisms	Eliminate/reduce storm water pollution/runoff through a Regulatory Mechanism requiring implementation of post-construction runoff controls for all development sites over one (1) acre, including redevelopment sites, and in compliance with the Construction General Permit.	**a**. Update the Metro Parks Rules and Regulations to include requirements for post-construction BMPs. **b**. Enforce Rules and Regulations at new development and redevelopment sites over one acre. **c**. Review Rules and Regulations annually and update as needed.	Update in 2023; Review Annually	**a.** Completed Y/N **b.** Effective Y/N **c**. Cite policy/procedures being used.	Project Manager, Park & Res. Mgt. staff	**5-01**
Post-Construction Requirements	Provide permanent storm water quality protection by using non-structural BMPs and structural BMPs.	**a.** Continue to support nonstructural BMPs, such as policies and procedures that direct growth away from environmentally sensitive areas and protect valuable natural resources. **b.** Continue to use structural BMPs with standards from the Rainwater and Land Development Manual and the current General Construction Permit, including Table 4b practices.	Ongoing	**a.** Completed Y/N **b.** Effective Y/N **c.** List of Structural and Non-Structural Standards being used	Project Manager, Park & Res. Mgt. staff	**5-02**
Site Plan Review Procedures	Provide permanent storm water quality protection by following procedures to review site plans for post-construction requirements as listed in Ohio EPA's General Construction Permit.	**a.** Review post construction facilities during SWPPP plan review using a checklist. **b.** Ensure an approved plan is in place before construction commences.	Per individual project approved plan.	**a.** # and location of applicable sites requiring post construction BMP's **b**. # of plans reviewed **c**. Summary of Activites **d.** Plan review sheets completed and filed (see MCM 4).	Project Manager & Park staff	**5-03**
Site Inspection Procedures	Monitor post-construction BMPs and the site for any runoff causing erosion and record the number of site inspections performed.	**a.** Request and receive as built surveys for post construction facilities. **b.** Inspect all post-construction BMPs during implementation and prior to acceptance of the project by Metro Parks to ensure the BMPs are installed and functioning properly. **c**. Inspect each post-construction BMP once over the permit term.	Per individual project approved plan	**a.** # of Inspections performed at project completion to verify controls built per requirements **b.** # of Long-Term O&M Inspectoins performed by MS4 **c.** Average Frequency **d**. Summary of Activities	Project Manager & Park staff	**5-04**
Enforcement Procedures	Enforce proper installation of post-construction BMPs per plan.	**a.** Continue current program and follow existing procedures to ensure that non-compliance on post construction facilities is resolved. **b**. Take enforcement action when compliance can not be achieved.	Per individual project approved plan.	**a.** # of Violation Letters **b.** # of Enforcement Actions	Project Manager & Park staff	**5-05**
Long-Term O&M Plans/Agreements	All new construction and redevelopment sites with stormwater infrastructure shall have a Long-Term Operation and Maintenance (O&M) plan.	**a.** Ensure O&M agreements are in place and responsibilities are understood.	Ongoing	**a.** Completed Y/N **b**. Effective Y/N **c**. # and location of sites requiring agreements **d.** # of plans developed and agreements in place **e.** Summary of activities	Project Manager, Park & Res. Mgt. staff	**5-06**
Green Infrastructure Education for Employees (see also MCM 1)	Provide education and training opportunities to support and facilitate green infrastructure/CGP Table 4b practices.	Provide education for staff on green infrastructure practices (See MCM 1).	Ongoing	See MCM 1	Park Managers and Park Staff	**5-07**
Green Infrastructure Implementation Project	Completion of one of the defined implementation projects in watersheds with TMDLs for Total Suspended Solids (Olentangy) or Nutrients (Big Darby, Big Walnut, and Olentangy).	Implement one of the following during the permit term: i. Retrofit an existing peak discharge stormwater practice ii. Stream restoration of at least three hundred (300) feet iii. Include green infrastructure requirements through ordinance/regulatory mechanism iv. Install a green infrastructure practice to treat a minimum one (1) acre impervious surface	One project once per permit term	Records, plans, photos and/or other documentation of the project	Project Manager, Park & Res. Mgt. staff	**5-08**

MCM 6 POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR MUNICIPLE OPERATIONS

Program Evaluation: Success of this minimum measure will be determined by meeting the measurables goals and/or their tracking parameters as outlined in the table below. Each of the measurable goals were chosen based on their expected potential to meet stormwater permit requirements and consensus by staff responsible for implementing the program. As Metroparks is an organization that has the protection and improvement of natural resources as part of its core mission, a vast majority of the land owned and operated by Metroparks is maintained in a natural state and is undeveloped. While there are relatively small areas that are developed, there are significant resources allocated toward managing the entirety of Metropark property. With this being the case, the pollution invention and good housekeeping activities outlined below help to ensure that the parks natural resources remain protected while at the same time providing a positive visitor experience.

BMP		Measurable Goal	Activities Summary	Schedule	Tracking Parameter and Documentation	Responsible Party	ID
Employee Training Program		Provide annual training on good housekeeping practices and pollution prevention to employees involved with park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and stormwater system maintenance.	**a.** Hold good housekeeping/pollution prevention training focused on topics related to facility and MS4 management. **b**. Include recognizing and reporting illicit discharges in annual training.	Annually	**a.** Topic of training **b.** Target Audience **c.** # of Employees Attended **d.** Summary of Activities **e**. sign-in sheet/record of completed training	Manager for Park Operations, Resource Manager	**6-01**
List of Facilities Subject to Program		Ensure all facilities that are required to have an up to date SWPPP as outlined by the stormwater permit and that employees understand and are following proper procedures for pollution prevention.	**a.** Review and update SWPPPs and facility procedures as needed **b**. Update list of facilities subject to the program as new facilities are added **c.** Conduct quarterly facility inspections to ensure employees are following proper procedures	Ongoing and Quarterly	**a.** List of faclities **b.** # Facility Inspections Performed **c.**. Frequencies of Inspections **d.** Inspection Forms	Park Managers	**6-02**
MS4 Maintenance		Maintain storm sewer infrastructure.	Maintain regular schedule for cleaning catch basins and structures. (See Metro Parks Maintenance Manual Standards, Chapter 3)	Ongoing	Summarize Activities Performed	Park Managers	**6-03**
			Follow soil stabilization timeline for MS4/ditch maintenance according to the same standards as the construction general permit (within 2 or 7 days of final grade).	Starting 4/1/2023	Summarize Activities Performed		**6-04**
Proper Stormwater Practices for Maintenance Activities	**Disposal of Wastes**	Properly dispose and/or recycle all waste, including oil, hazardous chemicals, etc.	**a.** Document amount of waste properly disposed **b.** Maintain procedures for proper waste disposal	Ongoing	**a.** Procedures developed Y / N **b.** Amounts and types of wastes properly disposed	Park Managers	**6-05**
	Road Salt	Properly store salt so that salt piles are covered with no run-on and subsequent run-off of salt, and all brine tanks and/or other liquid road treatments have bollards and/or secondary containment.	**a.** Appropriate cover for salt provided **b.** Secondary containment provided for liquid road treatments	Ongoing	**a.** Salt covered Y/N **b.** Secondary confinement for brine tanks provided Y/N	Park Managers	**6-06**
		Properly apply salt in a way that minimizes usage.	**a.** Continue current program and document tons of salt used each year **b.** Maintain procedures for reducing salt use	Annually	**a.** Procedures developed and refined to minimize salt usage Y/N **b.** Tons used **c.** Measures taken to minimize usage		**6-07**
	Pesticide and Herbicide Usage	Properly manage use of pesticides and herbicides	**a.** Continue current program, track amount of usage and periodically review permissible list **b.** Maintain procedures for reducing pesticide and herbicide use	Ongoing	**a.** Procedures developed Y / N **b.** Gallons and/or pounds used **c.** Measures taken to minimize usage	Park Managers, Resource Manager, Pesticide Committee	**6-08**
	Fertilizer Usage	Decrease use of fertilizer	**a.** Continue current program and track amount of fertilizer used **b**. Maintain procedures for reducing fertilizer use	Ongoing	**a.** Procedures developed Y / N **b.** Gallons and/or pounds used **c.** Measures taken to minimize usage	Park Managers	**6-09**
	Street Sweeping	N/A	(Street sweeping is not currently part of park operations).	N/A	N/A	N/A	**6-10**
Flood Management Projects		Ensure storm water management is considered for all flood management projects.	**a.** Track new or existing flood management projects assessed for impacts on waterways	Ongoing	**a.** Summarize any new or existing Flood Management Projects that were Assessed for Impacts on Water Quality	Resource Manager	**6-12**