



STORMWATER MANAGEMENT PLAN (SWMP)

**Ohio NPDES Small MS4 Permit 2GQ00010*CG
Allen County and Others**

Effective Date January 1, 2017



TABLE OF CONTENTS

SECTION	PAGE
Table of Contents	1
INTRODUCTION	
1.1 Regulatory Requirement.....	2
1.2 Background For The 2016 SWMP Update	2
1.3 The Allen County Urbanized Area Defined.....	2
1.4 Water Quality and Impaired Stream Segments	4
1.5 Permittees and Partnership Roles	6
STORMWATER MANAGEMENT PLAN	
2.1 Public Education and Outreach on Stormwater Impacts	7
2.2 Public Participation and Involvement.....	9
2.3 Illicit Discharge Detection and Elimination.....	10
2.4 Construction Site Runoff Control	12
2.5 Post-Construction Stormwater Management in New Development and Redevelopment	13
2.6 Pollution Prevention/Good Housekeeping for Municipal Operations	14
AUTHORIZATION	
3.1 Disclaimer.....	15
3.2 Certification to Ohio EPA.....	15

INTRODUCTION

1.1 REGULATORY REQUIREMENT

Under the authority of 40 CFR 122.26 the Stormwater Phase II Final Rule requires Allen County, the operator of a regulated small municipal separate storm sewer system (MS4), to obtain National Pollutant Discharge Elimination System (NPDES) permit coverage because stormwater discharges are considered "point sources" of pollution. Since 2003, Allen County has been required to design and implement a stormwater management program reducing the discharge of pollutants to the "maximum extent practicable" (MEP); protecting water quality and satisfying the appropriate water quality requirements of the Clean Water Act.

1.2 BACKGROUND FOR THE 2016 SWMP UPDATE

This SWMP outlines the six minimum control measures that are expected to impact significant reductions in pollutants discharged into the Ottawa River and its various tributaries located within the urbanized portion of Allen County. The basis for this plan are the original SWMPs that were presented to Ohio EPA in March 2003 for Allen County and Village of Elida in Ohio.

This presentation implies that the SWMPs submitted at that same time by American, Bath, Perry and Shawnee Townships for this urbanized area are and always have been an amalgamated representation within the Allen County SWMP. Further, the SWMP submitted in 2003 by the now legally dissolved (December 2012) political subdivision known as Fort Shawnee has been considered null and void. The expanded urbanized area within the Shawnee Township jurisdiction that resulted has been included in the Allen County SWMP since the dissolution.

Through the guidance provided by Ohio EPA in preparation of this SWMP update, Allen County was instructed that no actions, program elements, goals or activities set forth in the original plans are necessarily to be eliminated. So this plan was updated primarily with consideration to formally joining the Allen County and Elida SWMPs, and incorporating the NPDES Permit No. OHQ000003 requirements and performance standards not addressed in the 2003 original SWMPs. At the end of this plan document are actions, program elements, goals and activities from the 2003 SWMPs that are now irrelevant. The justification for requesting that Ohio EPA allow Allen County to eliminate them from the updated plan is included.

1.3 THE ALLEN COUNTY URBANIZED AREA DEFINED

The urbanized area is defined according to census data taken every ten years. Therefore it is subject to change each decade. The Allen County urbanized area increase from the 2000 to 2010 census. In this process it has been reported to Allen County that USEPA never allows an urbanized area to lose or vacate a previously included area. Figure 1 illustrates the changes that resulted due to the 2010 census. Allen County's urbanized area is currently 44 square miles in size and its urban population is 31,379. The six minimum control measures in this SWMP are targeted at the grey, blue and red areas within American, Bath, Perry and Shawnee Townships and the Village of Elida, Ohio.

Ohio EPA has exempted the urbanized areas identified within Sugar Creek Township (2012) and the Village of Cairo (2016). In August 2016, with the support of Allen County, Monroe Township submitted an exemption or waiver request and that had not been answered or officially approved by Ohio EPA at the time this SWMP update was submitted to the state agency. The Allen County SWMP excludes these three defined areas within its jurisdiction. It should be further noted that the Delphos and Bluffton urbanized areas are not part of this Phase II Stormwater Program mandate.

Census Urbanized-Areas 2000 - 2010

Urbanized Area Unchanged

2010 Urbanized Area Additions

2010 Urbanized Area Subtractions

0 1.25 2.5 5 Miles

May 2012

Figure 1. Allen County Urbanized Areas

1.4 WATER QUALITY AND IMPAIRED STREAM SEGMENTS

The Allen County urbanized area is entirely situated within the Ottawa River watershed. Since the 2003 original SWMP submissions, dramatic improvements in water quality and attainment of the state standards in the stream segments associated with the Allen County urbanized area has been documented by Ohio EPA through their 2010/2011 biological and water quality study and the resulting technical report on the Ottawa River watershed (EAS/2012-12-13). Figure 2 depicts the water quality attainment status from that report and is also reflected in the 2016 Ohio EPA Integrated Water Quality Monitoring and Assessment Report.

The following subwatersheds are identified with impairments in the urbanized area:

Lima Reservoir – Ottawa River HUC 04100007 03 06
Lost Creek HUC 04100007 03 05
Little Ottawa River HUC 04100007 04 01
Dug Run – Ottawa River HUC 04100007 04 02

The 2016 Integrated Report cites these impairment causes and sources (in no particular order):

Impairment Causes

Low flow alterations
Dissolved oxygen
Nutrients
Direct habitat alterations
Organic enrichment (sewage) biological indicators
Other anthropogenic substrate alterations
Impairment unknown
Other flow regime alterations
Nutrient/eutrophication biological indicators
Ammonia (total)
Excess algal growth
Impairment unknown
Fish passage barrier
Biochemical Oxygen Demand (BOD)
Fish kills

Impairment Sources

Urban runoff/storm sewers
Source unknown
Municipal point source discharges
Industrial point source discharges
Historic bottom deposits
Flow alterations from water diversions (domestic supply)
Dam or impoundment
Crop production with subsurface drainage
Combined sewer overflows
Sanitary sewer overflows (collection system failures)
Unspecified domestic waste
Package plant or other permitted small flows discharges
On-site treatment systems (septic systems and similar decentralized systems)
Channelization
Other spill related impacts

The Allen County SWMP strives to consider and address these causes and sources of water quality impairments as priority pollutants as they relate to the urban community in plans and implementation within all six minimum control measures.

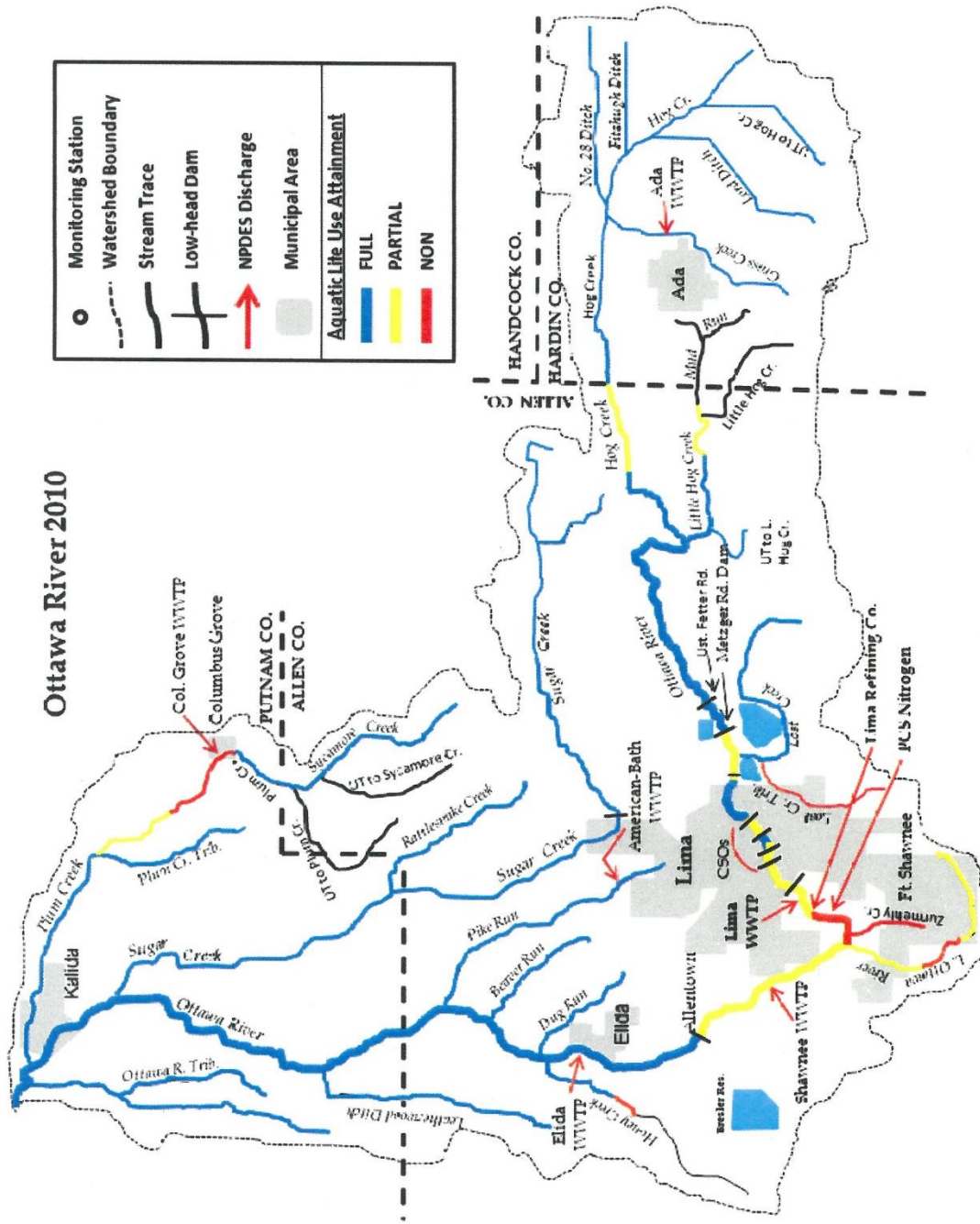


Figure 2. Map of surface waters of the Ottawa River basin, color coded to attainment status of sampled stream reaches compared to existing or recommended aquatic life use designation, 2010.

1.5 PERMITTEES AND PARTNERSHIP ROLES

Permit Holder – Allen County Commissioners (BOACC): Greg Sneary, Jay Begg, Cory Noonan

Co-Permittees – American Township Trustees – Paul Basinger, Lynn Mohler, Larry Vandemark

Road Supt – Scott Holmes

Bath Township trustees – Ron Miller, Bill Degen, Roy Hollenbacher

Road Supt – Denny Wilkins

Perry Township Trustees – Kevin Cox, Greg Kessen, Norm Capps

Road Supt – Corey Lehman

Shawnee Township Trustees – Russ Holly, Chris Seddelmeyer, David Belton

Road Supt – Howard Gray

Village of Elida Mayor – Mr. Kim Hardy Administrator – Dave Metzger

Street Supt – Ben Suever

Allen County Engineer County Engineer – Brion Rhodes

Drainage Engineer – Douglass Degen

Assistant Drainage Engineer – Nathan Davis

Allen SWCD Board Chairman – Robert Hutchinson

Stormwater Program Coordinator/MS4 Operator – Beth Seibert

Erosion and Sediment Control Oversight – Albert Suniga

Stormwater Management Plan Administrator – Allen SWCD with Stormwater Program Coordinator/MS4 Operator being served by staff member Beth Seibert. An MOU with each political subdivision (six) is renewed annually by Allen SWCD. Seibert is responsible for reporting to OEPA.

This stormwater management plan is served by a larger collaboration – Allen County Stormwater Partnership (partners detailed below).

MCM #1 Allen SWCD (Un-named educator and Seibert) is conducting most of these activities in partnership with Allen County, the four Townships, and the Village in conjunction with the Allen County Stormwater Partnership. Ottawa River Coalition members and partners play important roles in this MCM.

MCM#2 Allen SWCD (Un-named educator and Seibert) is conducting most of these activities in partnership with Allen County, the four Townships and the Village in conjunction with the Allen County Stormwater Partnership. Ottawa River Coalition members and partners play important roles in this MCM.

MCM#3 Allen SWCD (Seibert and Alaina Morman) administers the Illicit Discharge Program, but key agencies also serving this program include Allen County Emergency Management Office (Director, Tom Berger), Allen County Health Dept. (Environmental Director, Bill Kelly), Allen County Prosecutor's Office (Asst. Prosecuting Attorney, John Leahy Jr.), and the Allen County Sanitary Engineering Dept. (Sanitary Engineer, Steve Kayatin). An Illicit Discharge Appeals Board consists of 8 Allen County residents, appointed by the BOACC and serves the entire partnership. Outfall monitoring is directed and conducted by Allen SWCD (Seibert). The IDDE Hotline is conducted through Allen County EMA Office (Berger) as is the Spills Response and Management Program.

MCM#4 The Allen County Engineer's Office administers the Allen County Stormwater Management and Sediment Control Regulations. Allen County Drainage Engineer, Douglass Degen manages that program. Allen SWCD (Suniga, Seibert and Morman) is responsible for construction site inspections for SWP3 compliance and SWP3 and erosion and sediment control plans review. Lima Allen County Regional Planning Commission (Director, Thom Mazur) advises the process through his roles with zoning, flood plains and lot split approval.

MCM#5 The Allen County Engineer's Office administers the Allen County Stormwater Management and Sediment Control Regulations. Allen County Drainage Engineer, Douglass Degen manages that program. Allen SWCD (Suniga, Seibert and Morman) and the Allen County Engineer's Office (Degen, Davis and Josh Foster) are responsible for the annual and perpetual oversight of the post construction water quality controls.

MCM#6 Allen SWCD (Beth Seibert) works directly with Allen County, Village, four Township road departments and other field staff in implementing the stormwater management plan activities and conducting the associated GH/P² assessments and training.

STORMWATER MANAGEMENT PLAN (SWMP)

As required by Ohio EPA, the SWMP is organized within six Minimum Control Measures (MCMs): (1) Public Education and Outreach on Stormwater Impacts; (2) Public Participation and Involvement; (3) Illicit Discharge Detection and Elimination; (4) Construction Site Runoff Control; (5) Post Construction Stormwater Management in New Development and Redevelopment; and, (6) Pollution Prevention/Good Housekeeping for County/Municipal Operations. Each measure is addressed separately.

2.1 Public Education and Outreach on Stormwater Impacts:

Allen County is required to implement a public education program to distribute educational materials to the community or conduct equivalent outreach activities about the impacts of stormwater discharges on water bodies and the steps the public can take to reduce pollutants in stormwater runoff. Our target audience is the 31,379 residents in our 44 square mile urbanized area. The secondary audience for our public outreach efforts is the local business community, which is reached through our media releases, presentations to service clubs and professional networking groups, and utilization of the Chamber of Commerce's outreach network. The decision process for, and development of, our public education programming stems from thirty years of environmental and watershed education programming conducted by the Allen SWCD in this urbanized area. The Ottawa River Coalition and its some 45 member and partner organizations serve to advise and extend these programs. Therefore, Allen County and its partners support the following actions and program elements:

- 2.1.1 A Citizens Advisory Committee (CAC) will be utilized to assist in the ongoing development and implementation of BMPs targeting stormwater runoff impacts. The Ottawa River Coalition and its some 45 member and partner organizations largely serve in that role.
- 2.1.2 The County will undertake the necessary training to fulfill its role in public education and enforcement. The County will underwrite and otherwise support the training of the Board of Commissioners and the employees of the various County agencies. The County recognizes that these local public servants will be the first line of education and enforcement within the County and their command of stormwater issues is necessary to further the local understanding and implementation of the CWA mandates.
- 2.1.3 The County will develop, supply and/or purchase educational materials for public distribution and outreach. Educational materials include, but are not be limited to: displays, brochures, media releases, public presentations and website exhibition.
 - 2.1.3.1 Educational materials will inform citizens about the impacts polluted stormwater runoff discharges can have on water quality and steps the public can take to reduce pollutants in streams. Such materials will address the negative consequences of stormwater runoff and steps the public can take to reduce pollutants in streams. Proper landscaping and gardening including green design and maintenance, proper fertilizer and pesticide use, testing soil, proper disposal of pet waste, the proper use and disposal of household hazardous waste, septic system maintenance, prevention and reporting of illicit discharges, use of rain barrels, protecting soil resources from erosion, storm drain protection, waste management, water conservation, and litter prevention are all subjects of special emphasis.
 - 2.1.3.2 Youth education efforts are focused on schools. We have targeted the nine (public, private/charter, and parochial) school systems located in our

urbanized area. All totaled they operate on 18 separate campuses or buildings. It is our minimum goal to have annual stormwater related presentations within each campus at one grade band and we estimate that to involve 700 students and teachers per year. Other youth outreach includes educational presentations with Boy Scouts, Girl Scouts, 4-H Clubs, home school networks/families and others as requested.

- 2.1.3.3 Local television, newspaper and radio media will be utilized at least six times per year to disburse stormwater messages and information. Circulation for each of the media outlets we use are: WLIO TV (20,000), WOHL TV (3,000), The Lima News (90,000 readers/30,665 households), iHeartMedia radio stations (59,900), and Childers Media Group radio stations (31,600). We have earned a respected place as a credible and important source of information with all of our media outlets. The local television and radio outlets do support our efforts and run watershed and stormwater PSAs that we have created in regular circulation and at no cost to the County or watershed organization.
 - 2.1.3.4 Display materials will be prepared and made available for use in various venues. They will be updated over time as messages/themes evolve.
 - 2.1.3.5 A webpage with stormwater educational information will be conducted through the Allen SWCD website at www.allenswcd.com and partners will be asked/encouraged to link with that page. Separately, the Village of Elida will promote BMPs on their website which has become the primary vehicle with which they communicate with their 1,831 residents. Elida and Allen SWCD will strive to keep their websites current and connected with one another.
 - 2.1.3.6 Allen SWCD will utilize their Facebook social media account to regularly report on stormwater activities and issues. They will aim to continually connect with partner Facebook accounts to extend and grow that audience.
- 2.1.4 The County, with input from the permit partners and the CAC, will review and consider best management practices (BMPs) to improve water quality. The permit partners and the CAC can recommend specific BMPs to the County for consideration and possible inclusion in the local development standards. The permit partners and the CAC can also support efforts to include such BMPs in the various township and municipal development and regulatory standards within the County. Emphasized urban BMPs presented in the 2003 County SWMP for consideration/study and promotion are:
- 2.1.4.1 Landscape design and landscaping maintenance in order to minimize the extent of sediment bound stormwater runoff. Emphasis will also be placed on the proper application and management of fertilizers and pesticides able to negatively impact the quality of local waterways.
 - 2.1.4.2 Riparian buffer establishment in urban settings, including the consideration of adding riparian setback restrictions to zoning regulations.
 - 2.1.4.3 Standards for the establishment of low-impact and cluster developments within planned unit development zoning regulations.
 - 2.1.4.4 Construction and zoning standards that will minimize impervious surfaces and stormwater runoff.

- 2.1.4.5 Standards and regulations regarding the proper placement, construction and maintenance of home sewage treatment systems for purposes of determining minimum area requirements and furthering homeowner and tenant information and education.
- 2.1.4.6 Standards regarding the proper sizing, construction, and maintenance of commercial and public drainage and treatment techniques/programs/systems for purposes of furthering public information and education.

2.2 Public Participation and Involvement:

Allen County is required to comply with State and local public notice requirements and satisfy this minimum control measure's performance standards when implementing a public involvement/participation program. The decision process for, and development of, our public education programming stems from thirty years of environmental and watershed partnerships developed by the Allen SWCD in this urbanized area. The Ottawa River Coalition and its some 45 member and partner organizations serve to advise and extend these programs. Two key partner organizations in this MCM are Lima Allen County Neighborhoods in Partnership and Keep Allen County Beautiful.

Although, education is a key factor in soliciting public participation and involvement, education in turn creates citizen support of the program. The public outreach element closely mirrors public participation and involvement. The public participation and involvement measures will include all social and economic groups and will not necessarily differentiate between residential and commercial property owners. Therefore, Allen County and its partners support the following actions and program elements:

- 2.2.1 Support County and Ottawa River Coalition efforts/activities to improve local stormwater management and water quality.
- 2.2.2 The CAC will serve to review various BMPs at regular meetings as part of the County's public involvement and participation process. The CAC will review the merits of the BMPs in a public forum. The CAC will include local technical agencies in such meetings in order to provide the justification of such practices and a balanced perspective on the BMPs as they apply locally.
- 2.2.3 The CAC will convene regular stakeholder meetings to address stormwater issues and local development activities impacting the water quality and ecosystem in the community. CAC meetings will be advertised and appear in the Community Calendar published daily in the Lima News. Meeting notices of the CAC will also be reported at the bi-weekly meetings of the County Commissioners.
- 2.2.4 The County will support an on-going clean-up campaign of the Ottawa River and other impaired waterways by soliciting the assistance of local volunteers and providing the necessary private landowner notification and permission, supplies and waste disposal for the clean-up events. The County will coordinate an annual event with the Ottawa River Cleanup (established 1993). The County will support open records and retention with attendance rosters, volunteer information including contact numbers, clean-up information including tonnage, hours and expenditures.
- 2.2.5 The County will host and promote a pollution reporting hotline through the Allen County Emergency Management Agency at 419-993-1405.

- 2.2.6 The County will host storm drain marking opportunities. Volunteers will be trained on proper installation and safety considerations and they will be supplied with all necessary materials. Allen SWCD will make all necessary landowner and agency notifications.
- 2.2.7 The County and Village of Elida will promote household hazardous waste disposal opportunities through the North Central Ohio Solid Waste District. This includes local options for disposing of used auto fluids.
- 2.2.8 The Village of Elida will continue to offer bi-weekly curb-side recycling for their residents.
- 2.2.9 The County will facilitate in-stream presentations where citizens of all ages can participate in water quality assessments.
- 2.2.10 The County will promote the public usage of the Ottawa River Bikeway and Riverwalk in an effort to foster stewardship and a closer connection with the Ottawa River as an important natural resource.
- 2.2.11 The County will hold a public meeting annually with each of the six permitted jurisdictions to document its efforts and accomplishments at addressing stormwater runoff and improving the quality of stormwater discharging into area waterways.

2.3 Illicit Discharge Detection and Elimination:

Pursuant to USEPA mandates, Allen County must develop, implement and enforce a program to detect and eliminate illicit discharges into its public facilities and/or notify the jurisdiction and Ohio Environmental Protection Agency (OEPA) of their existence. The USEPA mandates that the following elements be addressed by impacted communities in their respective SWMP: (1) develop a storm sewer map showing the location of all outfalls and the names and locations of all surface waters of the State that receive discharges from those outfalls; (2) compile a list of names and addresses of all properties that have an on-site home sewage treatment systems (HSTS); (3) generate a resolution that prohibits and enforces the illicit discharges into storm sewer system; (4) develop and implement a plan to detect illicit discharges into storm system; and, (5) educate employees, business owners and the general public about the harmful effects to the environment produced by illicit discharges. Therefore, Allen County and its partners support the following actions and program elements:

- 2.3.1 The County and the Village of Elida have developed maps of storm sewer systems within the urbanized area. With the assistance of local technical agencies, they will continue to update those maps. Post-construction water quality BMPs (per MCM 5) are to be included in the storm sewer system mapping.
- 2.3.2 The County has identified those 757 property owners who are using HSTS, by physical address by owner or tenant residency. These locations have been mapped in GIS by Allen SWCD. This database was expanded after the 2010 census. With the assistance of local technical agencies, the maps will continue to be updated. Owners and tenants were notified in the first permit cycle with septic system maintenance information.
 - 2.3.2.1 The Household Sewage Treatment System (HSTS) Program conducted by the Allen County Public Health Department is to ensure that household sewage treatment systems are designed and installed under permit and in accordance with State and local regulations. Allen County is committed to prevent and to

keep the Waters of the State safe and free from contaminants by performing inspections, enforcing sewage regulations, and providing education to homeowners. Over the years, better design, site evaluations, and homeowner education have been very instrumental to this program.

- 2.3.2.2 The Health Dept conducts inspections on all HSTS that were permitted for installation since 1974. In the urbanized area, 269 (36%) of the HSTS fall under this evaluation and oversight. The Health Dept has a goal of 100% of the HSTS systems in the County being under permit and inspection by 2031.
- 2.3.2.3 When an HSTS is not functional, viable and cost-effective practice for a property or set of properties, the Health Dept works closely with the Allen County Sanitary Engineer for the extension of sanitary sewer or other public wastewater treatment service.
- 2.3.3 The County adopted Illicit Discharge Detection and Elimination Regulations in 2010. The Village of Elida joined them by resolution the same year. Allen SWCD is the administrator of those regulations. They will continue work to develop a comprehensive plan to detect and identify illicit hook-ups as well as to enforce pertinent regulations with the assistance of local technical agencies and the Allen County Prosecutor's Office. The County will support efforts to examine the use of a building code and more stringent plumbing codes/inspections to assist in the detection and elimination of illicit discharges. The County convenes an Illicit Discharge Appeals Board once a year at a minimum. That Board is made up of presently nine citizens – five board members and four alternates.
- 2.3.4 Allen SWCD engages in dry weather screening of pipe and surface drainage outfalls in all open channels in the urbanized area to assess water quality issues and identify illicit discharges and their end point. Dry weather screening is to be conducted or repeated on a five year cycle. Each incidence of a potential or suspicious discharge will be documented and reported to the appropriate follow-up, partnering agency. The goal is to trace all illicit discharges back to their source and eliminate them.
- 2.3.5 The County will support these actions with public education activities identified in Section 2.1 of the SWMP. The County will maintain the necessary documentation to prepare/release annual reports.
- 2.3.6 The Village of Elida will pursue inspecting and smoke testing buildings in their jurisdiction to identify illicit connections to the storm sewer system, as a condition of sale.
- 2.3.7 The success of the illicit discharge detection and elimination control measure will be measured against the following tasks: (1) the initial generation and periodic update of the storm sewer map and sanitary sewer map, which are expected to be completed in five years and maintained annually thereafter; (2) the initial identification and maintenance of a computerized listing of all HSTS properties, by property owner and street address number; (3) the ability to address the prohibition and enforcement of illicit discharges into storm sewer system; (4) implementation of a plan to detect illicit discharges into storm system and subsequent record keeping on the number of inspections, illicit hook-ups identified and any enforcement actions; and, (5) an evaluation of public education efforts with respect to illicit connections will be documented per Section 2.1 of the SWMP. A report documenting the County's accomplishments for this control measure will be prepared and presented annually.

2.4 Construction Site Runoff Control:

Pursuant to USEPA mandates, in order to satisfy minimum control measures for construction site stormwater runoff control, Allen County must develop, implement, and enforce a program to reduce pollutants in any stormwater runoff from construction activities that result in land disturbance of greater than or equal to one acre. The USEPA mandates that the following elements be addressed by impacted communities in their respective SWMP: (1) develop a regulatory mechanism to require erosion and sediment controls as well as sanctions to ensure compliance; (2) require construction site operators to control waste such as discarded building materials concrete truck wash out, chemicals, litter and sanitary waste at the construction site that may cause adverse impacts to water quality; (3) implement procedures for site plan review which incorporate consideration of potential water quality impacts; (4) require procedures for stormwater pollution prevention plan review which incorporate consideration of potential water quality impacts; (5) develop procedures for receipt and consideration of information submitted by the public; and, (6) establish procedures for site inspection and enforcement.

Allen County will address this control measure for site runoff through its continuation of the Allen County Stormwater and Sediment Control Regulations (SWSCR). The SWSCR were designed to reduce construction pollutants in stormwater runoff. The SWSCR were revised in 2016 to fully comply with the current EPA mandates. The Village of Elida has adopted the Allen County SWSCR and therefore gives authority to Allen County over their responsibilities in this MCM. Allen County acknowledges this MCM will serve to reinforce the standards of the Allen County SWSCR with additional requirements for regular inspections and enforcement actions. Therefore, Allen County and its partners support the following actions and program elements:

- 2.4.1 The County will work with local technical agencies to administer the SWSCR in order to: specifically target land disturbances of one acre or more; require developers to submit construction plans that contain measures to reduce soil erosion and control sediment runoff; and, impose punitive measures on developers for noncompliance.
- 2.4.2 The County will work with local technical agencies to inform and educate local developers/contractors that they are responsible for compliance with the Ohio EPA Construction General Permit (CGP) and the Allen County SWSCR. When noncompliance is found, the County and other responsible bodies, may issue a permit violation, stop work order, and/or fine.
- 2.4.3 The County will train employees in SWSCR practices to best identify corrective measures and noncompliance with BMPs.
- 2.4.4 The County will work with local technical agencies and area developers to construct a simple checklist designed to incorporate measures to minimize stormwater runoff and the sedimentation of receiving streams for use by the contractor and inspector.
- 2.4.5 The County will keep a copy of all construction plans and permits, complaints, and violation notices on file and available for public review during normal business hours.
- 2.4.6 The County will support this action with public education activities identified in Section 2.1 of the SWMP. The County will maintain the necessary documentation to prepare/release annual reports.
- 2.4.7 The Board of Allen County Commissioners will be the responsible party for the overall management and implementation of the County's Construction Site Stormwater Runoff control measure. Administration and permitting authority of the SWSCR had been given to the Allen County Engineer's Office. Then role of stormwater pollution prevention plan review and site inspection and oversight has been designated to Allen SWCD.

2.5 Post-Construction Stormwater Management in New Development/Redevelopment:

Pursuant to USEPA mandates, in order to satisfy minimum control measures for post construction stormwater management in new development and redevelopment, Allen County must ensure that controls are in place to prevent or minimize water quality impacts into perpetuity. The EPA requires that the following elements be addressed by communities in their respective SWMP: (1) use an ordinance or regulatory control mechanism to address post-construction runoff from new development and redevelopment projects; (2) develop and implement appropriate strategies which include a combination of structural and nonstructural BMPs; and, (3) ensure long term operation and maintenance of BMPs.

The County is required to seek compliance with all post construction BMPs permitted through the SWSCR since 2008. This date reflects the second generation of the stormwater NPDES permit issued to the County by the State. Allen County acknowledges that the *Ohio Rainwater and Land Development Manual* is their preferred guidance and reference to BMP selection, operation and maintenance. Allen SWCD is managing the oversight of these BMPs. The Allen County Engineer's Office will assume the role of perpetual BMP operation and maintenance on any site that is petitioned into their Drainage Maintenance Program. Therefore, Allen County and its partners support the following actions and program elements:

2.5.1 The Allen County SWSCR were revised in 2016 to reflect compliance with the current USEPA mandates. These regulations are the tool that gives Allen County legal authority over post construction BMP operation and maintenance.

2.5.2 Allen County will inventory and map all structural and nonstructural BMPs installed on SWSCR permitted sites for post construction water quality controls.

2.5.3 Allen County will maintain a file on each site and associated BMP with as-constructed plans and installation, operation and maintenance specifications/plans. The file will also identify and keep current who is responsible for maintenance on each site, with contact information and a record of communications.

2.5.4 Allen County will require, or conduct itself, an annual inspection of each BMP. These annual inspections will be documented in the respective files.

2.5.5 Allen County will seek to ensure that any maintenance required on any BMP will be scheduled with the responsible party. First and foremost the County will seek voluntary compliance with these requirements. The County will however issue violations for noncompliance and seek an injunction or other appropriate relief with the Allen County Prosecutor's Office.

2.5.6 Allen County will strive to secure a deed recorded easement or other agreement tool to protect and secure practices as a result of sale or otherwise transfer of properties.

2.6 Pollution Prevention/Good Housekeeping for County/Municipal Operations:

Pursuant to USEPA mandates, in order to satisfy minimum control measures for Pollution Prevention and Good Housekeeping for Municipal Operations, Allen County must develop and implement, an operations and maintenance program that includes a training component that has as the ultimate goal the reduction and prevention of pollutant runoff from municipal operations.

The Allen County operations that fall subject to this MCM include:

- Allen County Engineer's Office and Garage/Yard – 1501 N. Sugar Street
- American Township Office, Police Dept, Garage – 102 Pioneer Rd.
- American Township Fire Dept – Elida and Edgewood Stations
- Bath Township Office, Police Dept, and Garage – 2880 Ada Rd.
- Bath Township Fire Dept – 1787 N. Dixie Hwy.
- Bath Township Sandusky Road Landfill – Sandusky and Thayer Roads
- Johnny Appleseed Metro Parks District maintenance operations – based 2355 Ada Rd.
- Shawnee Township Office, Garage, Police Dept, and Fire Dept – 2530 Ft. Amanda Rd.
- Village of Elida WWTP – Dutch Hollow Road
- Village of Elida Water Plant and Distribution – Elida Rd.
- Village of Elida Office and Police Dept – Main Street.

Allen SWCD is serving as the agency that has developed and now oversees the implementation of the stormwater pollution prevention plans (SWP3). SWP3s will also be used to satisfy County SWSCR permitting requirements. Allen SWCD has also assumed responsibility for annual training and documentation of all employees associated with those operations. Therefore, Allen County and its partners support the following actions and program elements:

2.6.1 Allen County operations will adopt/implement vehicle inspection/maintenance schedules for vehicles. The vehicle maintenance program requires that all County vehicles be regularly inspected to eliminate the amount of oil, grease and fluid leaks.

2.6.2 Allen County will adopt and implement a salt program/policy. The program will document the past and present use of salt and the rationale for salt use by the County. A policy on the appropriate use of salt will be developed.

2.6.3 Allen County will utilize street sweeping as a BMP for removal of deposited sediments and other transportation associated pollutants. It will document those efforts and properly dispose of collected materials as solid waste.

2.6.4 Allen County will develop a training program for its employees to familiarize them with ways to minimize pollutants in stormwater runoff from municipal operations. Allen County will cooperate in the development of such training with the Ottawa River Coalition and other highway departments including the ACEO, the ACSEO and ODOT.

2.6.5 Allen County will adopt procedures to ensure that new flood management projects are assessed on impacts of water quality and existing projects are assessed for incorporation of additional water quality protection devices or practices.

2.6.6 The overall success of the pollution prevention plans and good housekeeping control measures will vary based on specific program elements: (1) drainage and stormwater management, (2) greenspace management, (3) impervious surface management, (4) vehicle operations management, (5) waste management, and (6) training will focus on the number of employees trained to competency.

AUTHORIZATION

3.1 Disclaimer:

This is the SWMP that Allen County and its partners present. Allen County recognizes that this is an ambitious undertaking and strives each year to make increases toward full implementation of the plan and all elements within each minimum control measure. During the course of the SWMP preparation, in both 2002 and 2016, local officials questioned the County's financial ability relative to full implementation and meeting the general permit requirements. Allen County believes that full implementation is beyond current funding resources and continues to consider how to fully support the program. Allen County reserves the right to disavow specific aspects of this SWMP should they be found to exceed the County's legal authority to adopt, enforce or financially underwrite.

3.2 Certification

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



By: _Beth A. Seibert, Allen SWCD_____

Title: _Allen County Stormwater Program Coordinator_

Date: _December 20, 2016_____

Items Allen County is requesting to be removed from the 2003 SWMP in 2016

MCM #1 Public Education and Outreach

- 2.1.3.2 Mail inserts will notify employees and residents of opportunities for Household Hazardous Waste Collection, recycling opportunities, litter collection and clean-up opportunities to include the Ottawa River Cleanup and Little Ottawa cleaning project. Mail insert materials will be specifically targeted to residential and commercial property owners. *Rationale for removal – This has not been necessary since other education outreach efforts are collectively accomplishing the permit requirements. It has been an impractical and cost-prohibitive element of the original Allen County SWMP, especially in this era when employee paychecks are not produced in a hard copy, paper mailing or distribution.*
- 2.1.4.1 Conservation tillage and residue management as agricultural practices minimizing erosion and loss of soil on agricultural land. *Rationale for removal – This is an agricultural BMP is not deemed a practical approach or use of time for promotion in this urbanized area.*
- 2.1.4.2 Shelterbelts as an agricultural practice minimizing erosion and sedimentation. *Rationale for removal – This is an agricultural BMP is not deemed a practical approach or use of time for promotion in this urbanized area.*
- 2.1.4.3 Reforestation programs as an agricultural practice minimizing sediment-bound chemical pollution from agricultural runoff. *Rationale for removal – This is an agricultural BMP is not deemed a practical approach or use of time for promotion in this urbanized area.*
- 2.1.4.4 Manure management programs in order to minimize the extent of storage overflows and manure application to land in riparian areas impacting stormwater runoff. *Rationale for removal – This is an agricultural BMP is not deemed a practical approach or use of time for promotion in this urbanized area.*
- 2.1.4.6 The County, with input from the CAC, will review and recommend revised standards for the Allen County Stormwater Sediment Control Regulations (SWSCR). *Rationale for removal – The County Stormwater and Sediment Control Regulations were updated in 2016 and therefore this element is not necessary or relevant to remain in this MCM.*
- 2.1.5 The Board of Allen County Commissioners will develop and maintain a listing of all property owners in the impacted subwatersheds for education/notification purposes. The list will identify property owners by name, mailing addresses and the economic land use of the parcels. *Rationale for removal – Maintaining a specific database of property owners in impaired subwatersheds is not practical, especially considering the transient nature of people in this era and a high percentage of tenants or renters. The County is doing a fine job of accessing or creating short term mailing lists through the County Engineer drainage files, the County Auditor database, and data from other partners when contacts are needed for specific outreach initiatives.*

- 2.1.6 The Board of Allen County Commissioners will support the CAC in its efforts with the necessary technical and financial support. The County will support open public records and retention with permits, site plans, permits and violation notices. Minutes of CAC meetings shall also be made available. The County will coordinate efforts with local technical and regulatory agencies. *Rationale for removal – This is a given expectation for the permit holder and does not need to be called out as a plan deliverable. It was included in the original plan to provide confidence to OEPA that Allen County could get the job done.*
- 2.1.7 The Board of Allen County Commissioners will be the responsible party for the overall management and implementation of the County's public education and outreach program. *Rationale for removal – This is a given expectation for the permit holder and does not need to be called out as a plan deliverable. It was included in the original plan to provide confidence to OEPA that Allen County could get the job done.*
- 2.1.8 The timeline for the public education and outreach by program element follows: *Rationale for removal – This deliverable and the associated table were specific to the first five year permit cycle. Allen County deems it unnecessary at this stage (year 14) of the permit.*
- 2.1.9 The overall success of the public education and outreach control measure will be based on: (1) the willingness of citizens to serve on the CAC; (2) attendance and participation of area stakeholders in the planning process; (3) the number of employees trained to proficiency; (4) the number of educational brochures/mailling inserts distributed; and (5) by the number of BMPs addressed. A report documenting the County's SWMP accomplishments will be prepared and presented annually. *Rationale for removal – This is a given expectation for the permit holder and does not need to be called out as a plan deliverable. It was included in the original plan to provide confidence to OEPA that Allen County could get the job done. It really serves as a summary statement in that first generation SWMP.*

Elida Village SWMP - MCM #1

Removal of the village newsletter as a tool for public information. *Rationale for removal – Since the original plan was written in 2003, the Village has discontinued their use of a printed and mailed newsletter. Over this 13 year period, they have come to rely on their website and very brief messages within their monthly utility bills to communicate key information with their residents.*

Removal of the one hour seminar on water conservation, trash management, and pet waste. *Rationale for removal – Those one-time commitments from the 2003 SWMP were met in 2011.*

MCM #2 – Public Involvement

- 2.2.6 The Board of Allen County Commissioners will be the responsible party for the overall management and implementation of the County's public education and outreach program. *Rationale for removal – This is a given expectation for the permit holder and does not need to be called out as a plan deliverable. It was*

included in the original plan to provide confidence to OEPA that Allen County could get the job done.

- 2.2.7 The timeline for the public involvement and participation by program element follows: *Rationale for removal – This deliverable and the associated table were specific to the first five year permit cycle. Allen County deems it unnecessary at this stage (year 14) of the permit.*
- 2.2.8 The overall success of the public participation and involvement control measure will be based on: (1) the attendance and participation of area stakeholders; (2) the number of public meetings held, the number of people involved in such meetings, and the issues addressed in the meetings; (3) participation at public events including the Ottawa River Cleanup and other stream cleaning projects will be evaluated using the number of tons of trash collected, the number of volunteers attending and the hours donated; and, (4) a report documenting the County's accomplishments for this control measure will be prepared and presented annually. *Rationale for removal – This is a given expectation for the permit holder and does not need to be called out as a plan deliverable. It was included in the original plan to provide confidence to OEPA that Allen County could get the job done. It really serves as a summary statement in that first generation SWMP.*

Elida Village SWMP - MCM #2

Removal of the surveys within a village newsletter as a tool for connecting with the public. *Rationale for removal – Since the original plan was written in 2003, the Village has discontinued their use of a printed and mailed newsletter. Over this 13 year period, they have come to rely on their website and very brief messages within their monthly utility bills to communicate key information with their residents. In this same time frame, residents have plenty of opportunity to submit public comment or input to the extent that a survey tool is now impractical and un-necessary.*

MCM #3 – Illicit Discharge

- 2.3.6 The Board of Allen County Commissioners will be the responsible party for the overall management and implementation of the County's illicit discharge detection and elimination control measure. *Rationale for removal – This is a given expectation for the permit holder and does not need to be called out as a plan deliverable. It was included in the original plan to provide confidence to OEPA that Allen County could get the job done.*
- 2.3.7 The timeline for the illicit discharge detection and elimination by program element follows: *Rationale for removal – This deliverable and the associated table were specific to the first five year permit cycle. Allen County deems it unnecessary at this stage (year 14) of the permit.*

MCM #4 – Construction Site Runoff Control

- 2.4.8 The timeline for the construction site stormwater management control measure by program element follows: *Rationale for removal – This deliverable and the associated table were specific to the first five year permit cycle. Allen County deems it unnecessary at this stage (year 14) of the permit.*
- 2.4.9 The overall success of the construction site stormwater management control measure will be based on: (1) completing the public planning process regarding the proposed revisions to and legal adoption of the Allen County SWSCR standards; (2) the number of plans submitted, the number of plans rejected/revised, the number of plans approved; (3) the number of actual site inspections conducted, the number of violations found and the sanctions imposed; (4) the nature and extent of public records kept for documentation purposes and the number of people/agencies requesting to see such documentation; (5) developing procedures for site plan reviews; and, (6) procedures for receipt and consideration of information submitted by the public. A report documenting the County's accomplishments for this control measure will be prepared and presented annually. *Rationale for removal – This is a given expectation for the permit holder and does not need to be called out as a plan deliverable. It was included in the original plan to provide confidence to OEPA that Allen County could get the job done. It really serves as a summary statement in that first generation SWMP. At the time of this 2016 SWMP update submission, the issues raised here in 2003 had been fully addressed.*

MCM #5 – Post Construction Requirements

- 2.6.7 Allen County recognizes the need and supports efforts to review and revise local regulatory controls and planning documents in order to assess the long-term practicality and sustainability of local development patterns. The County will develop strategies to address nonstructural BMPs with local stakeholders. *Rationale for removal – Clearly, neither Allen County nor the Village of Elida understood the true intention and scope of MCM 5 when the SWMP was originally created in 2002 and submitted to the State in 2003. That is very obvious in the elements that follow (2.6.7 through 2.6.13).*
- 2.6.7.1 The County, with input from the CAC, will review and consider adopting revised standards for floodplain development.
- 2.6.7.2 The County, with input from the CAC, will review and consider adopting standards for the establishment of riparian buffers.
- 2.6.7.3 The County, with input from the CAC, will review and consider adopting planned unit development standards.
- 2.6.7.4 The County, with input from the CAC, will review and consider adopting standards for the establishment of cluster developments.

- 2.6.7.5 The County, with input from the CAC, will review and consider adopting landscaping and buffering standards.
- 2.6.7.6 The County, with input from the CAC, will review and consider adopting construction standards that will minimize impervious surfaces and minimize stormwater runoff.
- 2.6.8 The County will implement and sustain a “litter collection” program. The program will remove litter from built areas before litter has the ability to enter receiving waters of the State. The program will use the assistance of local inmates and the support of the Allen County Sheriff and the County Engineering departments.
- 2.6.9 The County will implement and sustain a “catch basin cleaning” program. The program will remove debris from catch basins in urban areas before the debris has the ability to enter receiving waters of the State. The program will use the assistance of the County Engineer’s road crews.
- 2.6.10 The County will support these actions with public education activities identified in Section 2.1 of the SWMP. The County will support the CAC with the necessary documentation to prepare/release annual reports.
- 2.6.11 The Allen County Board of Commissioners will be the responsible party for the overall management and implementation of the County’s post-construction stormwater management in new development and redevelopment control measure.
- 2.6.12 The timeline for the post-construction stormwater management control measure by program element follows:
- 2.6.13 The overall success of the post-construction stormwater management in new and redevelopment control measure will be based in large measure on other activities undertaken in tandem with several previously identified control measures including: public education, public involvement and construction site stormwater management. An evaluation of the program elements is heavily dependent upon the outcome of the public planning process regarding the proposed revisions to and legal adoption of the Allen County SWSCR standards and the various standards governing local development and zoning. To quantify the accomplishments of this specific control measure, it will be necessary to document the attendance and participation of area stakeholders. Outcomes will be measured using the number of public meetings held, the number of people attending, the issues addressed in the meetings, and the number of revisions made to existing regulatory controls/plans. If and when such regulatory controls are modified and implemented, total acreage preserved/improved/landscaped could be calculated. Participation in the litter collection activity should be evaluated with the number of bags of litter collected, the number of volunteers attending and the hours donated. Participation in the catch basin cleaning should include the number of basins cleaned, the tons of debris removed and the number of man hours expended in the programming. A report documenting the County’s accomplishments for this control measure will be prepared and presented annually.

MCM #6 – Good Housekeeping and Pollution Prevention

- 2.6.4 The Board of Allen County Commissioners will be the responsible party for the overall management and implementation of the County's pollution prevention and good housekeeping control measure. *Rationale for removal – This is a given expectation for the permit holder and does not need to be called out as a plan deliverable. It was included in the original plan to provide confidence to OEPA that Allen County could get the job done.*
- 2.6.5 The timeline for the pollution prevention and good housekeeping by program element follows: *Rationale for removal – This deliverable and the associated table were specific to the first five year permit cycle. Allen County deems it unnecessary at this stage (year 14) of the permit.*

County Commissioners' Office
Allen County, Ohio
December 27, 2016 Resolution #875-16

**RE: BOARD OF COUNTY COMMISSIONERS AUTHORIZES THE SUBMISSION OF
THE UPDATED PHASE II STORMWATER PROGRAM SWMP TO THE OHIO
EPA DIVISION OF SURFACE WATER.**

The Board of County Commissioners, Allen County, Ohio, met in session on the 27th day of December, 2016 with the following members present: Greg Sneary, Jay Begg and Cory Noonan

Commissioner Noonan moved the adoption of the following:

RESOLUTION

WHEREAS, Allen County has held an Ohio EPA Phase II Stormwater Permit Number 2GQ00010*CG since 2003; and

WHEREAS, in the third generation or cycle of that permit, the State of Ohio has required all permit holders to update their Stormwater Management Plan (SWMP); and

WHEREAS, the Allen Soil and Water Conservation District (SWCD), as Local Administrator of that document, has completed that task and presented same in a public hearing conducted on December 20, 2016; and

WHEREAS, the update of the Allen County SWMP represents the allowance by the State for a formal merging of six SWMP's submitted to Ohio EPA in 2003 for Allen County, the Village of Elida and American, Bath, Perry and Shawnee Townships; now therefore

BE IT RESOLVED, BY THE BOARD OF COUNTY COMMISSIONERS OF ALLEN COUNTY, OHIO, hereby approves the submission of the updated Phase II Stormwater Program SWMP to the Ohio EPA Division of Surface Water.

Commissioner Sneary seconded the resolution and upon the roll being called, the vote resulted as follows: Commissioner Sneary, yes; Commissioner Begg, yes; Commissioner Noonan, yes.

Adopted this 27th
day of December, 2016

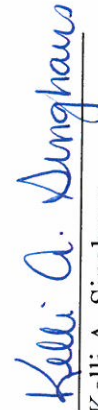
**BOARD OF COUNTY COMMISSIONERS
ALLEN COUNTY, OHIO**



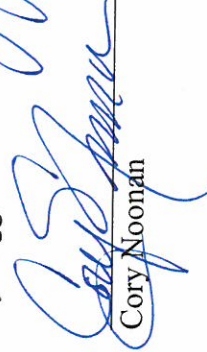
Greg Sneary



Jay Begg



Kelli A. Singhaus
Clerk of Board



Cory Noonan