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Appendix A OEPA December 15, 2003 Letter

Appendix B Revisions to SWMP Based Upon 3.2.3.2.1

Appendix C Revisions to Our SWMP Based Upon 3.2.6.2.2

Appendix D Measurable Goals for Each MCM BMP

Table 1: BMP Measurable Goals for Public Involvement/Public Education MCM

Table 2: BMP Measurable Goals for Illicit Discharge & Detection MCM

Table 3: BMP Measurable Goals for Construction Site Storm Water Runoff MCM

Table 4: BMP Measurable Goals for Post-Construction MCM

Table 5: BMP Measurable Goals for Pollution Prevention/Good Housekeeping MCM

## **Section I: Introduction**

On March 28, 2003, Cuyahoga County was approved (Ohio EPA Facility Permit Number: 3GQ10003\*AG) for coverage under Ohio EPA NPDES General Permit OHQ100000.

The plan designed by Cuyahoga County to reduce the discharge of pollutants into our MS4 consists of two (2) separate Storm Water Management Programs (SWMPs). The first is prepared by the County Engineer's Office concerning its activities, and the second SWMP outlines the plan for activities that fall under the jurisdiction of the Board of County Commissioners. Together, these SWMPs comprise the complete Storm Water Management Program for Cuyahoga County.

Section 4.3 of the General Permit requires annual reports to the director starting one year after the date Ohio EPA has granted general permit coverage.

This Annual Report is comprised of two (2) separate documents. The first document contains report information concerning the County Engineer's SWMP, while the other document contains report information for activities that fall under the jurisdiction of the Board of County Commissioners.

Additionally, Cuyahoga County was notified by the Ohio EPA on December 15, 2003, that several sections of our SWMP were considered deficient. As requested, this Annual Report addresses these deficiencies.

## **Section 2: Revisions to the SWMP Based Upon OEPA Identified Deficiencies**

On December 15, 2003, the Ohio EPA notified Cuyahoga County of deficiencies in our SWMP. A copy of that letter is included in Appendix A. The OEPA identified the following seven (7) sections as deficient:

### **3.2.3.2.1**

*How will you develop a storm sewer map showing the location of all outfalls and the names and location of all receiving waters. Describe the sources of information you used for the maps, and how you plan to verify the outfall locations with field surveys. If already completed, describe how you developed this map. Also, describe how your map will be regularly updated.*

We feel that the OEPA is looking for clearer documentation from us that we will field verify the outfalls. We have added the following to our SWMP on pages 11 and 12:

**In addition to compiling data as described above, field investigations will begin during the summer of 2004, along the County and Township Roads, as well as along the major storm water outfalls in and through Olmsted and Chagrin Townships. These investigations will be charted against the digital records and be imported into the mapping database.**

**Regular updates will be made each summer in the same fashion while all new recorded subdivisions or commercial developments will be imported into the database in an “As-built” fashion.**

**We will field locate each HSTS and their connections to our system.**

Copies of the revised pages of the SWMP are attached in Appendix B.

We also added a new BMP to describe our field verification activities. This BMP has been added to Table 2. A copy of revised Table 2 is included in Appendix B.

### 3.2.6.2.2

*Any government employee training program you will use to prevent and reduce storm water pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and storm water system maintenance. Describe any existing, available materials you plan to use. Describe how this training program will be coordinated with the outreach programs developed for the public involvement minimum measure and the illicit discharge minimum measure.*

We felt our SWMP needed to improve the link between the outreach programs developed for the Public Involvement Minimum Control Measure and the Illicit Discharge Minimum Control Measure. We have added the following to our SWMP on page 28:

**However, we are in the process of developing a program that will help educate 100% of our maintenance employees within three (3) years and will continue annual training for said employees. This program, along with the Illicit Discharge Minimum Control Measure will be coordinated along with our Public Information Department. Our training program will utilize information gathered by the Public Information Department and the Chief Maintenance Superintendent regarding Pollution Prevention/Good Housekeeping for Municipal Operations. Included in this practice is the use of brochures, flyers, newsletters, and web sites. We are not aware of materials and programs that may be available to us. These information pieces are made available by** ~~Therefore, our earliest efforts will be investigating the sources of materials and programs available from outside agencies such as the Ohio EPA, the Cuyahoga County Soil and Water Conservation District, The Cuyahoga County Board of Health, and others. Our ultimate goal will be to provide training for 100% of our maintenance employees within three (3) years and develop a program of continuing training for all employees beyond that time. As procedures are developed concerning the documentation of Illicit Discharge complaints and the follow-up investigation, all of our employees will be trained in those procedures.~~ **In addition, along with the Illicit Discharge Minimum Control Measure, we will also teach our employees how to properly document the tracking and elimination procedures of any and all waste. These forms of documentation will be reviewed at annual training sessions and will be updated annually.**

Copies of the revised pages of the SWMP are attached in Appendix C.

We also added a new BMP to describe our employee education activities. This BMP has been added to Table 5. A copy of revised Table 5 is included in Appendix C.

In addition to the above two (2) sections, the OEPA noted the following five (5) sections as deficient:

3.2.3.2.2

*The mechanism (ordinance or other regulatory mechanism) you will use to effectively prohibit illicit discharges into the MS4 and why you chose that mechanism. If you need to develop this mechanism, describe your plan and schedule to do so. If your ordinance or regulatory mechanism is already developed, include a copy of the relevant sections in your plan.*

3.2.4.2.1

*The mechanism (ordinance or other regulatory mechanism) you will use to require erosion and sediment controls at construction sites and why you chose that mechanism. If you need to develop this mechanism, describe your plan and schedule to do so. If your ordinance or regulatory mechanism is already developed, include a copy of the relevant sections in your plan.*

3.2.5.2.2

*How your program [to address storm water runoff from new development and redevelopment projects] will be specifically tailored for your local community, minimize water quality impacts, and attempt to maintain pre-development conditions.*

3.2.5.2.5

*What are the mechanisms (ordinance or other regulatory mechanisms) you will use to address post construction runoff from new developments and redevelopments and why you chose that mechanism. If you need to develop this mechanism, describe your plan and schedule to do so. If your ordinance or regulatory mechanism is already developed, include a copy of the relevant sections in your plan.*

3.2.5.2.6

*How will you ensure the long-term operation and maintenance (O&M) of your selected BMPs. Options to help ensure that future O&M responsibilities are clearly identified include and agreement between you and another party such as the post-development landowners or regional authorities.*

These sections are not relevant to the operations of the County Engineer's Office. Therefore, we have discussed these sections with the developers of the SWMP outlining the plan for activities that fall under the jurisdiction of the Board of County Commissioners. The Annual Report for that portion of Cuyahoga County's SWMP will address these sections.

### **Section 3: Appropriateness and Effectiveness of Selected BMPs**

After one year of the NPDES Phase II program, the Cuyahoga County Engineer's Office is pleased with our selection of BMPs and their effectiveness. The implementation of the BMPs, over the course of the permit period will lead to the improvement of water quality within our jurisdictional area.

The composition of our Storm Water Management Plan Review Committee assures that the implementation of our selected BMPs will be organization wide. Beside the County Engineer and the administrative staff, our committee includes Department Heads of the Bridge Design, Bridge Inspection and Maintenance, Construction, Highway Design, Maintenance, Public Information, Survey, and Transportation and Traffic Departments. Each Department Head has been directly involved in the committee and with the selection and implementation of the BMPs.

As can be seen in our Minimum Control Measure summaries for Construction, Post-Construction, and Good Housekeeping, much of the first year of the permit period was used to review and document our current practices. In all cases, this has been accomplished. Many of our BMPs for the second year of the permit period require us to research and explore alternative practices. Already in early 2004, we see new policies and procedures being introduced by other organizations, probably in conjunction with their own individual Phase II permits. As an example, in January 2004, the Ohio Department of Transportation introduced their Post Construction Storm Water Management Interim Policy and provided training (which we attended). Using the information gathered in 2003 concerning our current practices, along with new information that will be gathered during the upcoming year, we will ultimately be able to make intelligent decisions concerning policies and practices that will be implemented.

We began providing storm water information to our employees and the public in 2003 through our Public Information and Public Education MCM BMPs. For much of the public, this was the first time they have received information concerning storm water quality. We will continue this practice in 2004. We are confident that our efforts, combined with the efforts of many other organizations in Northeast Ohio, will result in increased awareness among the public of how their individual activities affect storm water quality.

Finally, through our Illicit Discharge MCM, we are continuing our efforts to have complete and accurate storm sewer system maps created and available. This will allow all our employees to be aware of illicit discharges and track the source. In particular, our Bridge Inspection crews come in contact with discharges into streams and rivers in their day-to-day work. They have developed a process for detecting and documenting illicit discharges. Already in 2003, they found several illicit discharges and the owner of the local MS4 was notified.

A summary of each BMP is included in Appendix D.

#### **Section 4: Progress Towards Achieving Identified Measurable Goals**

The Cuyahoga County Engineer's Office has met all Measurable Goals identified for 2003 in our Storm Water Management Program. A summary sheet of each BMP including the name of the BMP, Responsible Party, 2003 Measurable Goal, Description of 2003 Progress, and 2004 Measurable Goal is included in Appendix D, Measurable Goals for Each MCM BMP.

#### **Section 5: Status of Compliance with Permit Conditions**

The Cuyahoga County Engineer's Office has complied with all permit conditions.

On December 15, 2003, the OEPA notified us of seven deficiencies with the Cuyahoga County SWMP. A copy of this notification is included in Appendix A. As requested by the OEPA, Cuyahoga County has addressed all deficiencies in this Annual Report. Two (2) of these items are discussed above in Section II of this document. The remaining items are discussed in the second document included as part of Cuyahoga County's Annual Report.

The Cuyahoga County Engineer's Office has met or exceeded the Measurable Goal for each BMP provided in our SWMP. A summary of each BMP including a Description of 2003 Progress is included in Appendix D of this report.

#### **Section 6: Summary of Storm Water Activities to be Implemented in 2004**

The Cuyahoga County Engineer's Office has included a summary of each BMP in Appendix D. Besides the description of the BMP and discussion of progress in 2003, the summary includes the 2004 Measurable Goal for each BMP identified in our Storm Water Management Program.