

# **CITY OF MIDDLETOWN, OHIO**



## **PHASE II NPDES ANNUAL REPORT 2008-2009 (YEAR 6)**

**APRIL 3, 2009**

# CITY OF MIDDLETOWN

## PHASE II NPDES ANNUAL REPORT

### 2008-2009 (YEAR 6)

During the past year, the City of Middletown (City) continued to make steady progress towards completing the compliance activities outlined in the City's Storm Water Management Plan (SWMP). Similar to previous years, the work completed during 2008/2009 reflected a continuation of activities performed during the prior year, as well as some new activities. Some of the major accomplishments completed over the past year include:

- Continuation of public education and involvement activities;
- Implementation of Illicit Discharge Detection and Elimination provisions;
- Implementation of the Erosion and Sediment Control Rules and Regulations, including provisions for post-construction BMP installation, operations, and maintenance; and
- Capital purchases of storm water maintenance equipment and hiring of storm water maintenance staff enabled by the Storm Water Utility.

A brief description of the City's 2008/2009 (Year 6) compliance efforts for each Minimum Control Measure (MCM) is provided below. Complete summaries of all the 2008/2009 compliance activities are found in Tables 1-1 to 1-6. The City's measurable goals for 2009/2010 (Year 7) can be found in Tables 2-1 to 2-6.

**Public Education & Outreach (MCM 1)** – Over the past year the City and several regional agencies continue to educate and inform the public about local storm water issues through a variety of media. The following is a brief summary of activity highlights related to MCM 1. Additional details are provided in **Table 1-1**.

- The City co-sponsored the Butler County Water Festival on October 17, 2008, in which the City provided education pamphlets on storm water and presented a course on WWTP processes and the effects of pollutants in our storm drains.
- The City continued to broadcast programs that included storm water related topics, including "8 Minutes in Middletown" on TV Middletown (Channel 24).
- Additional public education continues to be provided through the City's web site, utility bill inserts, presentations, and other mechanisms described in the City's Storm Water Management Plan.

**Public Participation & Involvement (MCM 2)** – Over the past year the City and several regional agencies have continued to provide its residents with opportunities to

participate in storm water related activities. The following is a brief summary of the activity highlights related to MCM 2. Additional activities are summarized in **Table 1-2**.

- The City continued to support and take part in Butler County's Household Hazardous Waste Collection Day by advertising the event in the city bulletin, inserts in utility bills, posting flyers around City buildings, and linking the event to the City's storm water website.
- The City took part in the Great Miami Clean-up which included clean-up of 1.5 streambank miles within the Bicentennial Commons Park along the Great Miami River. The cleanup removed 25 bags of trash and 9 tires.
- Other opportunities available for public involvement include the Keep Middletown Beautiful program and use of the City's Citizen Service Center Complaint System.

**Illicit Discharge Detection and Elimination (MCM 3)** – The following is a brief summary of the activity highlights related to MCM 3. The City's progress toward year 6 measurable goals for MCM 3 is summarized in **Table 1-3**.

- The City continued to maintain its storm water infrastructure GIS, including its inventory and map of MS4 outfalls and its list of HSTs.
- Illicit Discharge Detection and Elimination requirements were included in the Erosion and Sediment Control Rules and Regulations issued by the Director of Public Works during 2008.

**Construction Site Runoff Control (MCM 4)** – The following is a brief summary of the activity highlights related to MCM 4. The City's progress toward year 6 measurable goals for MCM 4 is summarized in **Table 1-4**.

- The Erosion and Sediment Control Rules and Regulations were issued by the Director of Public Works during 2008, and implemented city-wide.
- The City reviewed site plans for development projects subject to these rules during 2008 and have initiated required site inspections.
- The City receives and responds to storm water complaints, including those related to construction sites, and provides developers with educational material and design guidance.

**Post Construction Runoff Control (MCM 5)** – The City's progress toward year 6 measurable goals for MCM 5 is summarized in **Table 1-5**. The following is a brief summary of activity highlights related to MCM 5.

- Post-construction BMP requirements are included in the City's Erosion and Sediment Control Rules and Regulations and subject to site plan reviews conducted by the City.

- The City is evaluating its policy for private property owners to operate and maintain post-construction BMPs.

**Pollution Prevention & Good Housekeeping (MCM 6)** – The City’s progress toward year 6 measurable goals for MCM 6 is summarized in **Table 1-6**. The following is a brief summary of activity highlights related to MCM 6.

- The City hired a dedicated maintenance crew for stormwater operation and maintenance activities and is providing on-going training of this crew.
- Continued to track activities of the storm water maintenance crews.
- Continued its ongoing catch basin replacement effort by installing 3 new catch basins, 31 replacement catch basins, and repair of 187 catch basins.
- Purchased storm water maintenance equipment including a vactor-truck, dump truck, track-hoe, trailer, and two light duty trucks.

### **Activity Goals for 2009/2010**

**Tables 2-1** through **2-6** provide a summary of measurable goals for 2009/2010 (Year 7) reporting period. In addition to continuing to implement the activities outlined in Middletown’s SWMP, the City is also in the process of reviewing the newly issued NPDES Small MS4 General Stormwater Discharge Permit. The City will be reviewing its storm water management program and will develop a plan for incorporation of the permit’s new requirements into its SWMP. These plans, in addition to 2009 activities, will be presented in the 2009 annual report. The City recognizes a number of permit items that are a priority for 2009, including:

- A Public Education and Involvement plan to target at least five public involvement themes and five public education activities over the 5-year permit term reaching 50% of the population.
- A revision to the Illicit Discharge Detection and Elimination program activities as necessary to comply with new permit requirements.
- A revision to the City’s development regulations and processes to be consistent with the current Ohio EPA Construction General Permit within two years of coverage under this permit; addressing pre-construction review of SWPPPs, post-construction BMPs, O&M plan requirements, and pre-construction/post-construction BMP inspections.
- A final Operations and Maintenance Manual for municipal operations that includes employee training.

# **TABLES 1-1:1-6, 2-1:2-6**

**TABLE 1-1  
CITY OF MIDDLETOWN, OH  
PHASE II NPDES  
2008/2009 COMPLIANCE ACTIVITY SUMMARY  
MINIMUM CONTROL MEASURE 1**

<b>MINIMUM CONTROL MEASURE 1 PUBLIC EDUCATION &amp; OUTREACH</b>	<b>Ohio EPA General Permit Section Number</b>	<b>MEASURABLE GOALS YEAR 6</b>	<b>YEAR 6 ACTIVITIES</b>
OHIO EPA REQUIREMENT: Implement a public education program to distribute educational materials to the community or conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps that the public can take to reduce pollutants in storm water runoff.	Section 3.2.1	Participate, sponsor, and support regional events that educate the public on storm water related topics.	<b>Complete.</b> The City co-sponsored the Butler County Water Festival on October 17, 2008, provided educational pamphlets on storm water, and presented a course on WWTP processes and the effects of pollutants in our storm drains.
OHIO EPA REQUIREMENT: Implement a public education program to distribute educational materials to the community or conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps that the public can take to reduce pollutants in storm water runoff.	Section 3.2.1	Establish topics and schedule for PSA's for Channel 24. Continue broadcasting storm water announcements as begun in Year 1.  The City also plans to become involved with the Regional Stormwater Consortium.	<b>In Progress.</b> The City has continued to broadcast programs that include storm water related topics, including "8 Minutes in Middletown" The City is continuing to evaluate a partnership with the Regional Stormwater Collaborative.
OHIO EPA REQUIREMENT: Implement a public education program to... conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps that the public can take to reduce pollutants in storm water runoff.	Section 3.2.1	Continue to announce upcoming city and county agency storm water-related meetings on utility bills.	<b>Complete.</b> The City continued to include announcements of upcoming storm water related meetings in utility bills.
OHIO EPA REQUIREMENT: Implement a public education program to distribute educational materials to the community or conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps that the public can take to reduce pollutants in storm water runoff.	Section 3.2.1	Maintain links to Butler SWCD on the City's website.  Add links to the Regional Stormwater Consortium ( <a href="http://www.savelocalwaters.org">www.savelocalwaters.org</a> ) to the City's website.  Track the number of hits on the City's website.	<b>Complete.</b> The City continued to maintain links to Butler SWCD on it's website. Links to the Regional Stormwater Collaborative will be added following formalization of a possible partnership. The total number of hits on the City's website was 311.
OHIO EPA REQUIREMENT: Implement a public education program to... conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps that the public can take to reduce pollutants in storm water runoff.	Section 3.2.1	Continue to place announcements in the Middletown Journal to announce upcoming city and county meetings related to storm water.	<b>Complete.</b> The City continues to advertise City Council meetings in the Middletown Journal.
OHIO EPA REQUIREMENT: Implement a public education program to distribute educational materials to the community or conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps that the public can take to reduce pollutants in storm water runoff.	Section 3.2.1	Maintain and update storm water page on City website.  Add links to the Regional Stormwater Consortium ( <a href="http://www.savelocalwaters.org">www.savelocalwaters.org</a> ) to the City's website.  Track the number of hits on the City's website.	<b>Complete.</b> The City continued to maintain it's website. Links to the Regional Stormwater Collaborative will be added following formalization of a possible partnership. The total number of hits on the City's website was 311.
OHIO EPA REQUIREMENT: Implement a public education program to distribute educational materials to the community or conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps that the public can take to reduce pollutants in storm water runoff.	Section 3.2.1	Continue use of groundwater flow model at city-sponsored events. Set schedule and goals for use to implement during the next permit term.	<b>Complete.</b> The City continued to make the groundwater flow model available for use at city sponsored events. Future scheduling of the groundwater flow model will depend on demand, although the City expects that it will be able to accommodate all requests.
OHIO EPA REQUIREMENT: Implement a public education program to distribute educational materials to the community or conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps that the public can take to reduce pollutants in storm water runoff.	Section 3.2.1	The City began receiving funds from the recently implemented storm water utility during 2006 and early 2007. During 2008 the City will re-evaluate the feasibility of this BMP in light of newly available funding from the utility.	<b>Complete.</b> The City has allocated the utility funding appropriately to pursue compliance with it's permit.

**TABLE 1-1  
CITY OF MIDDLETOWN, OH  
PHASE II NPDES  
2008/2009 COMPLIANCE ACTIVITY SUMMARY  
MINIMUM CONTROL MEASURE 1**

<b>MINIMUM CONTROL MEASURE 1 PUBLIC EDUCATION &amp; OUTREACH</b>	<b>Ohio EPA General Permit Section Number</b>	<b>MEASURABLE GOALS YEAR 6</b>	<b>YEAR 6 ACTIVITIES</b>
OHIO EPA REQUIREMENT: Implement a public education program to distribute educational materials to the community or conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps that the public can take to reduce pollutants in storm water runoff.	Section 3.2.1	The City's website has been redesigned during 2006 and now has the capability of tracking hits from viewing traffic. In light of the website's new capabilities, the City will again endeavor to track website traffic during 2008.	<b>Complete.</b> The City's website received 311 hits in 2008.
OHIO EPA REQUIREMENT: Implement a public education program to distribute educational materials to the community or conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps that the public can take to reduce pollutants in storm water runoff.	Section 3.2.1	Continue to make storm water related presentations to the Middletown City Council.	<b>Complete.</b> On August 19th and December 2nd a presentation was made regarding purchase of storm water maintenance equipment.

**TABLE 1-2  
CITY OF MIDDLETOWN, OH  
PHASE II NPDES  
2008/2009 COMPLIANCE ACTIVITY SUMMARY  
MINIMUM CONTROL MEASURE 2**

MINIMUM CONTROL MEASURE 2 <b>PUBLIC PARTICIPATION AND INVOLVEMENT</b>	Ohio EPA General Permit Section Number	MEASURABLE GOALS YEAR 6	YEAR 6 ACTIVITIES
OHIO EPA REQUIREMENTS: The permittee must comply with State and local public notice requirements when implementing a public involvement/participation program.	Section 3.2.2	Continue to hold public Storm Water informational meetings as needed.	<b>Complete.</b> The public was open to attend two City Council meetings at which storm water maintenance equipment purchases and aerial photographs of the City's drainage area were discussed.
OHIO EPA REQUIREMENTS: The permittee must comply with State and local public notice requirements when implementing a public involvement/participation program.	Section 3.2.2	Continue to participate in community water pollution control related activities including Household Hazardous Waste (HHW) Collection Day, yard waste collection, and curbside recycling. Rather than hosting its own HHW collection event, the City will again advertise and support the Butler County HHW collection event.  Continue to advertise events on TV Middletown and in The Middletown Journal. Radio ads will be replaced by participation in events facilitated by the Regional Stormwater Consortium.  Add event announcements to the City's website.	<b>Complete.</b> The City is currently contracted with Rumpke waste collection for yard waste and recycling services. The City continued to support and take part in Butler County's HHW Collection Day by advertising the event in the City Bulletin, inserts in utility bills, posting flyers around City buildings, and linking the event to the City's storm water website.
OHIO EPA REQUIREMENTS: The permittee must comply with State and local public notice requirements when implementing a public involvement/participation program.	Section 3.2.2	Encourage participation in Keep Middletown Beautiful via inclusion of appropriate references and links to Keep Middletown Beautiful activities on the City's storm water website.	<b>Complete.</b> The City's website includes a link to Keep Middletown Beautiful. Keep Middletown Beautiful volunteers picked up trash normally deposited into the City's storm water collection systems during April and May of 2008.
OHIO EPA REQUIREMENTS: The permittee must comply with State and local public notice requirements when implementing a public involvement/participation program.	Section 3.2.2	Continue partnership with Butler SWCD to promote and implement USEPA's "Adopt Your Watershed Program." Promote program on City's website.	<b>In Progress.</b> The City is evaluating a partnership with Butler County Storm Water District.
OHIO EPA REQUIREMENTS: The permittee must comply with State and local public notice requirements when implementing a public involvement/participation program.	Section 3.2.2	Continue partnership with Butler SWCD to develop storm drain inlet stenciling program in 2008.	<b>Complete.</b> The stenciling program was initiated. Volunteers will be utilized to implement the stenciling activities.
OHIO EPA REQUIREMENTS: The permittee must comply with State and local public notice requirements when implementing a public involvement/participation program.	Section 3.2.2	Continue partnership with Butler SWCD to promote the Stream Monitoring and Quality Assessment Program. Work with volunteers to monitor water quality in area streams.  Continue partnership with Butler SWCD to participate in the Great Miami Clean-Up scheduled for 2008.	<b>In Progress.</b> The City is evaluating a partnership with Butler County Storm Water District. <b>Complete.</b> The City took part in the great Miami Clean-up on May 10, 2008, which included clean-up of the shoreline and park area within Bicentennial Commons. The event covered 1.5 streambank miles, and collected 25 bags of trash and 9 tires.
OHIO EPA REQUIREMENTS: The permittee must comply with State and local public notice requirements when implementing a public involvement/participation program.	Section 3.2.2	Maintain Citizen Service Center complaint system to address storm water-related telephone calls. Continue efforts to address complaints and to include this information in annual permit reports.	<b>Completed.</b> The City's citizen service center complaint system received 210 complaints relating to storm water. All complaints have been resolved.
OHIO EPA REQUIREMENTS: The permittee must comply with State and local public notice requirements when implementing a public involvement/participation program.	Section 3.2.2	Provide the annual NPDES Phase II report submitted to Ohio EPA to Middletown City Council.	<b>Complete.</b> The 2007 NPDES Phase II report was made available to Middletown City Council through posting on the City's storm water website.

**TABLE 1-3  
CITY OF MIDDLETOWN, OHIO  
PHASE II NPDES  
2008/2009 COMPLIANCE ACTIVITY SUMMARY  
MINIMUM CONTROL MEASURE 3**

<b>MINIMUM CONTROL MEASURE 3 ILLICIT DISCHARGE DETECTION AND ELIMINATION</b>	<b>Ohio EPA General Permit Section Number</b>	<b>MEASURABLE GOALS YEAR 6</b>	<b>YEAR 6 ACTIVITIES</b>
Ohio EPA REQUIREMENT: Develop, if not already completed, a storm sewer system map, showing the location of all outfalls and the names and location of all waters of the United States that receive discharges from those outfalls	Section 3.2.3.1.2	The City completed the outfall mapping in 2007 through its consultant, CDM.  The City will endeavor to update the map of outfalls as needed.	<b>Complete.</b> The City's GIS Map of its storm water system includes outfall locations and is updated as needed with any new public works infrastructure installed. The City is working on updating the outfall map with private outfalls installed in 2008.
Ohio EPA REQUIREMENTS: A list of all on-site sewage disposal systems connected to discharge to your MS4 (a.k.a. home sewage treatment systems (HSTs)) including the addresses; and a storm sewer map showing the location of all HSTs connected to your MS4.	Sections 3.2.3.1.2.1.1 and 3.2.3.1.2.1.2	Develop a map showing the location of discharging septic systems in the Urbanized Area.	<b>In Progress.</b> The City Health Department has listed all known HSTs from the Health Department, and is developing an implementation plan for mapping of the HSTs.
Ohio EPA REQUIREMENTS: Develop and implement a plan to detect and eliminate illicit discharges... into your small MS4	Sections 3.2.3.1.1 and 3.2.3.1.4	Prepare illicit discharge elimination plan - <b>Completed in Year 4.</b>	<b>Complete.</b>
Ohio EPA REQUIREMENTS: To the extent allowable under State, Tribal or local law, effectively prohibit, through ordinance, or other regulatory mechanism, illicit discharges into your storm sewer system and implement appropriate enforcement procedures and actions	Section 3.2.3.1.3	Review Butler and Warren County resolutions to identify the existing illicit discharge elimination provisions that affect Middletown citizens - <b>Completed in Year 4.</b> No relevant Butler and Warren County resolutions were identified.	<b>Complete.</b>
Ohio EPA REQUIREMENTS: To the extent allowable under State, Tribal or local law, effectively prohibit, through ordinance, or other regulatory mechanism, illicit discharges into your storm sewer system and implement appropriate enforcement procedures and actions	Section 3.2.3.1.3	Finalize, adopt, and implement illicit discharge detection and elimination ordinance.  Legal review is anticipated to be complete in early April of 2008.  If approved, the ordinance will take effect in early May of 2008.	<b>Complete.</b> Language prohibiting illicit discharges to the City's MS4 has been incorporated into the City's Erosion and Sediment Control Rules and Regulations.
Ohio EPA REQUIREMENTS: Develop and implement a plan to detect and eliminate illicit discharges... into your small MS4	Sections 3.2.3.1.1 and 3.2.3.1.4	Finalize and implement illicit detection plan - <b>Completed in Year 5.</b>  Investigations into the cause and elimination of observed dry weather flow are pending passage of the illicit discharge detection & elimination ordinance in Spring of 2008.	<b>Complete.</b> The City is responding to Illicit Discharge complaints.
Ohio EPA REQUIREMENTS: Develop and implement a plan to detect and eliminate illicit discharges... into your small MS4	Sections 3.2.3.1.1 and 3.2.3.1.4	Implement source elimination provisions of the illicit discharge detection plan for any illicit discharges detected and confirmed during the visual screening/dry-weather flow monitoring.	<b>Complete.</b> The City formed a dedicated storm water operation and maintenance division which, among other activities, will address illicit discharge detection and elimination.

**TABLE 1-4  
CITY OF MIDDLETOWN, OHIO  
PHASE II NPDES  
2008/2009 COMPLIANCE ACTIVITY SUMMARY  
MINIMUM CONTROL MEASURE 4**

<b>MINIMUM CONTROL MEASURE 4 CONSTRUCTION RUNOFF CONTROL</b>	<b>Ohio EPA General Permit Section Number</b>	<b>MEASURABLE GOALS YEAR 6</b>	<b>YEAR 6 ACTIVITIES</b>
Ohio EPA REQUIREMENT: Your program must include... Procedures for site plan review which incorporate consideration of potential water quality impacts	Section 3.2.4.1.4	Continue construction plan reviews using the checklist that specifically identifies items related to storm water pollution prevention that are to be included on construction plans.	<b>Complete.</b> The City reviewed plans submitted for compliance with the City's Erosion and Sediment Control Rules and Regulations.
Ohio EPA Requirement: Your program must include... An ordinance or other regulatory mechanism to require erosion and sediment controls, as well as sanctions to ensure compliance, to the extent allowable under State or local law	Section 3.2.4.1.1	Finalize and implement erosion and sedimentation control ordinance. This is an ongoing measurable goal to be completed by year 5 of the permit term.	<b>Complete.</b> The Erosion and Sediment Control Rules and Regulations have been implemented city-wide.
Ohio EPA REQUIREMENT: Your program must include... Requirements for construction site operators to implement appropriate erosion and sediment control BMPs... Procedures for site inspection and enforcement of control measures	Sections 3.2.4.1.2 and 3.2.4.1.6	Continue to incorporate the use of the checklist into the City's plan review requirements.	<b>Complete.</b>
Ohio EPA REQUIREMENT: Your program must include... Requirements for construction site operators to implement appropriate erosion and sediment control BMPs... Procedures for site inspection and enforcement of control measures	Sections 3.2.4.1.2 and 3.2.4.1.6	Continue incorporating inspectors into the standard review process in-house.	<b>Complete.</b> Erosion and sediment control inspectors are included in the plan review process.
Ohio EPA REQUIREMENT: Your program must include... Requirements for construction site operators to implement appropriate erosion and sediment control BMPs... Procedures for site inspection and enforcement of control measures	Sections 3.2.4.1.2 and 3.2.4.1.6	Implement the framework to enforce the requirements of approved erosion and sediment control plans for each site should a field inspection identify improperly functioning erosion and sediment control measures on a construction site.	<b>Complete.</b> The framework is prepared and ready for enforcement when required.
Ohio EPA REQUIREMENT: Your plan must include... Procedures for receipt and consideration of information submitted by the public	Section 3.2.4.1.5	Continue to log storm water erosion complaints into the complaint tracking system.	<b>Complete.</b> The City's citizen service center complaint system received 210 complaints relating to storm water. All complaints have been resolved.
Ohio EPA REQUIREMENT: Your program must include... Requirements for construction site operators to implement appropriate erosion and sediment control BMPs	Sections 3.2.4.1.2	Continue to make the storm water pollution control packet of information available to contractors and developers.  The storm water pollution control packet of information will be added to the City's storm water website in 2008.	<b>Complete.</b> The storm water pollution control packet has been made available to contractors and developers through the City's website and in hard copy in the City office.
Ohio EPA REQUIREMENT: Your program must include... Requirements for construction site operators to implement appropriate erosion and sediment control BMPs	Sections 3.2.4.1.2	Continue to make the City's Manual of Design available to contractors and developers.  The Manual of Design is currently posted on the City's engineering website.	<b>Complete.</b> The Manual of Design is available to contractors and developers through the City's website and in hard copy in the City office.

**TABLE 1-5  
CITY OF MIDDLETOWN, OHIO  
PHASE II NPDES  
2008/2009 COMPLIANCE ACTIVITY SUMMARY  
MINIMUM CONTROL MEASURE 5**

<b>MINIMUM CONTROL MEASURE 5 POST CONSTRUCTION RUNOFF CONTROL</b>	<b>Ohio EPA General Permit Section Number</b>	<b>MEASURABLE GOALS YEAR 6</b>	<b>YEAR 6 ACTIVITIES</b>
Ohio EPA REQUIREMENT: Develop, implement, and enforce a program to address storm water runoff from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale, that discharge into your MS4 ...address storm water runoff from new development and redevelopment projects that disturb greater than or equal to one acre that discharge into the MS4. The program must ensure that controls are in place that would prevent or minimize water quality impacts.	Section 3.2.5.1.1	Prepare proposed revised ordinance language and present to City Council for review, revision, and approval. Final enactment of revised ordinances by City Council.	<b>Complete.</b> The revised language is included in the Erosion and Sediment Control Rules and Regulations.
Ohio EPA Requirement: Develop and implement strategies which include a combination of structural and/or non-structural BMPs appropriate for the community	Section 3.2.5.1.2	Continue use of post-construction structural BMPs guidance provided in the latest version of the ODNR Rainwater and Land Development manual.	<b>Complete.</b> The City continues to use the ODNR Rainwater and Land Development Manual.
Ohio EPA REQUIREMENT: Use an ordinance or other regulatory mechanism to address post-construction runoff from new development and redevelopment projects	Section 3.2.5.1.3	Prepare proposed revised ordinance language and present to City Council for review, revision, and approval. Final enactment of revised ordinances by City Council.	<b>Complete.</b> The revised language was included in the Erosion and Sediment Control Rules and Regulations.
Ohio EPA REQUIREMENT: Ensure adequate long-term operation and maintenance of BMPs	Section 3.2.5.1.4	Create the long term Operation and Maintenance Plan for newly installed post-construction structural BMPs. Add a provision to require developers/contractors to submit an operation and maintenance sheet (plan and schedule) for each new structural BMP that will remain after the completion of construction.	<b>In Progress.</b> The City continues to develop O&M requirements for Post-construction BMPs in the Erosion and Sedimentation Control Rules and Regulations.
Ohio EPA REQUIREMENT: Ensure adequate long-term operation and maintenance of BMPs	Section 3.2.5.1.4	Conduct maintenance of post-construction structural BMPs for regional basin.  This measureable goal is pending creation of the Operation and Maintenance Plan.	<b>Complete.</b> The City inspects required basins and maintains as necessary.

**TABLE 1-6  
CITY OF MIDDLETOWN, OHIO  
PHASE II NPDES  
2008/2009 COMPLIANCE ACTIVITY SUMMARY  
MINIMUM CONTROL MEASURE 6**

<b>MINIMUM CONTROL MEASURE 6 POLLUTION PREVENTION &amp; GOOD HOUSEKEEPING</b>	<b>Ohio EPA General Permit Section Number</b>	<b>MEASURABLE GOALS YEAR 6</b>	<b>YEAR 6 ACTIVITIES</b>
Ohio EPA REQUIREMENTS: Develop and implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations.	Section 3.2.6.1.1	Develop schedule to integrate logged job card data into GIS System.	<b>In Progress.</b> The City is continuing to develop a schedule for integrating the logged job card data into the GIS System. Maintenance activities are continuously tracked through the use of logged job cards.
Ohio EPA REQUIREMENTS: Develop and implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations.	Section 3.2.6.1.1	Continue to develop an O&M Manual for the Public Works Department that provides procedures, documentation requirements, and schedules for pollution prevention and good housekeeping.  The O&M Manual is scheduled to be completed in 2008.	<b>In Progress.</b> Internal training of good housekeeping practices is ongoing. The City is beginning to assemble each practice into an O&M manual during 2009.
Ohio EPA REQUIREMENTS: Develop and implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations.	Section 3.2.6.1.1	Continue ongoing catch basin replacement effort.	<b>Complete.</b> The City continued it's ongoing catch basin replacement effort. This included 3 new CBs, 31 replacement CBs, and 187 repaired CBs.
Ohio EPA REQUIREMENTS: Develop and implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations.	Section 3.2.6.1.1	Once the O&M Plan is completed, implement and document associated activities. Submit annual report updates. Update the plan as necessary based on input from the Public Works Department.	<b>In Progress.</b> The City is beginning to assemble each practice into an O&M manual. In 2008 the city purchased storm water maintenance equipment including a vector truck.
Ohio EPA REQUIREMENTS: ...your program must include employee training 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.	Section 3.2.6.1.2	Continue to conduct annual training of Public Works Department employees in aspects of pollution prevention/good housekeeping.	<b>Complete.</b> Internal training of good housekeeping practices is ongoing.

**TABLE 2-1  
CITY OF MIDDLETOWN, OH  
PHASE II NPDES  
2009/2010 COMPLIANCE ACTIVITY GOALS  
MINIMUM CONTROL MEASURE 1**

<b>MINIMUM CONTROL MEASURE 1 PUBLIC EDUCATION &amp; OUTREACH</b>	<b>Ohio EPA General Permit Section Number</b>	<b>MEASURABLE GOALS YEAR 7</b>
OHIO EPA REQUIREMENT: Implement a public education program to distribute educational materials to the community or conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps that the public can take to reduce pollutants in storm water runoff.	Section 3.2.1	Continue broadcasting storm water announcements in the City Council meetings on Channel 24.
OHIO EPA REQUIREMENT: Implement a public education program to... conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps that the public can take to reduce pollutants in storm water runoff.	Section 3.2.1	Continue to announce upcoming city and county agency storm water-related meetings and activities on utility bills.
OHIO EPA REQUIREMENT: Implement a public education program to distribute educational materials to the community or conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps that the public can take to reduce pollutants in storm water runoff.	Section 3.2.1	Continue the City's participation in Butler County's Water Festival.
OHIO EPA REQUIREMENT: Implement a public education program to... conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps that the public can take to reduce pollutants in storm water runoff.	Section 3.2.1	Evaluate joining the Butler County Storm Water District, Regional Stormwater Collaborative, and the Ground Water Consortium. Add links of partnerships to City's Storm Water website.
OHIO EPA REQUIREMENT: Implement a public education program to distribute educational materials to the community or conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps that the public can take to reduce pollutants in storm water runoff.	Section 3.2.1	Maintain and update storm water page on City website as necessary. The City will introduce a new website format in 2009 located at <a href="http://www.cityofmiddletown.org">www.cityofmiddletown.org</a> .  Track the number of hits on the City's storm water website.
OHIO EPA REQUIREMENT: Implement a public education program to distribute educational materials to the community or conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps that the public can take to reduce pollutants in storm water runoff.	Section 3.2.1	Continue to make the City's groundwater flow model available for city-sponsored events.

**TABLE 2-1  
CITY OF MIDDLETOWN, OH  
PHASE II NPDES  
2009/2010 COMPLIANCE ACTIVITY GOALS  
MINIMUM CONTROL MEASURE 1**

<b>MINIMUM CONTROL MEASURE 1 PUBLIC EDUCATION &amp; OUTREACH</b>	<b>Ohio EPA General Permit Section Number</b>	<b>MEASURABLE GOALS YEAR 7</b>
OHIO EPA REQUIREMENT: Implement a public education program to distribute educational materials to the community or conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps that the public can take to reduce pollutants in storm water runoff.	Section 3.2.1	Continue to maintain a library of printed media relating to storm water pollution prevention for distribution at public events.
OHIO EPA REQUIREMENT: Implement a public education program to distribute educational materials to the community or conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps that the public can take to reduce pollutants in storm water runoff.	Section 3.2.1	Continue to make storm water related presentations to the Middletown City Council.

**TABLE 2-2  
CITY OF MIDDLETOWN, OH  
PHASE II NPDES  
2009/2010 COMPLIANCE ACTIVITY GOALS  
MINIMUM CONTROL MEASURE 2**

<b>MINIMUM CONTROL MEASURE 2 PUBLIC PARTICIPATION AND INVOLVEMENT</b>	<b>Ohio EPA General Permit Section Number</b>	<b>MEASURABLE GOALS YEAR 7</b>
OHIO EPA REQUIREMENTS: The permittee must comply with State and local public notice requirements when implementing a public involvement/participation program.	Section 3.2.2	Continue to hold public Storm Water informational meetings as needed at City Council.
OHIO EPA REQUIREMENTS: The permittee must comply with State and local public notice requirements when implementing a public involvement/participation program.	Section 3.2.2	Continue to participate in community water pollution control related activities including Household Hazardous Waste (HHW) Collection Day, yard waste collection, and curbside recycling. Rather than hosting its own HHW collection event, the City will again advertise and support the Butler County HHW collection event.  Add event announcements to the City's website.
OHIO EPA REQUIREMENTS: The permittee must comply with State and local public notice requirements when implementing a public involvement/participation program.	Section 3.2.2	Encourage participation in Keep Middletown Beautiful via inclusion of appropriate references and links to Keep Middletown Beautiful activities on the City's storm water webpage.
OHIO EPA REQUIREMENTS: The permittee must comply with State and local public notice requirements when implementing a public involvement/participation program.	Section 3.2.2	Evaluate joining the Butler County Storm Water District, Regional Stormwater Collaborative, and the Ground Water Consortium.
OHIO EPA REQUIREMENTS: The permittee must comply with State and local public notice requirements when implementing a public involvement/participation program.	Section 3.2.2	Solicit and organize volunteers to implement storm drain inlet stenciling program.
OHIO EPA REQUIREMENTS: The permittee must comply with State and local public notice requirements when implementing a public involvement/participation program.	Section 3.2.2	Support and participate in the Great Miami Clean-Up scheduled for May 2, 2009.
OHIO EPA REQUIREMENTS: The permittee must comply with State and local public notice requirements when implementing a public involvement/participation program.	Section 3.2.2	Maintain Citizen Service Center complaint system to address storm water-related complaints. Continue efforts to address complaints and to include this information in annual permit reports.

**TABLE 2-2  
CITY OF MIDDLETOWN, OH  
PHASE II NPDES  
2009/2010 COMPLIANCE ACTIVITY GOALS  
MINIMUM CONTROL MEASURE 2**

<b>MINIMUM CONTROL MEASURE 2 PUBLIC PARTICIPATION AND INVOLVEMENT</b>	<b>Ohio EPA General Permit Section Number</b>	<b>MEASURABLE GOALS YEAR 7</b>
OHIO EPA REQUIREMENTS: The permittee must comply with State and local public notice requirements when implementing a public involvement/participation program.	Section 3.2.2	Provide the annual NPDES Phase II report submitted to Ohio EPA to Middletown City Council.

**TABLE 2-3  
CITY OF MIDDLETOWN, OHIO  
PHASE II NPDES  
2009/2010 COMPLIANCE ACTIVITY GOALS  
MINIMUM CONTROL MEASURE 3**

<b>MINIMUM CONTROL MEASURE 3 ILLICIT DISCHARGE DETECTION AND ELIMINATION</b>	<b>Ohio EPA General Permit Section Number</b>	<b>MEASURABLE GOALS YEAR 7</b>
Ohio EPA REQUIREMENT: Develop, if not already completed, a storm sewer system map, showing the location of all outfalls and the names and location of all waters of the United States that receive discharges from those outfalls	Section 3.2.3.1.2	Update outfall map with any newly installed outfalls.
Ohio EPA REQUIREMENTS: A list of all on-site sewage disposal systems connected to discharge to your MS4 (a.k.a. home sewage treatment systems (HSTSs)) including the addresses; and a storm sewer map showing the location of all HSTSs connected to your MS4.	Sections 3.2.3.1.2.1.1 and 3.2.3.1.2.1.2	Translate HSTS list to a map showing the location of discharging septic systems in the urbanized area.
Ohio EPA REQUIREMENTS: Develop and implement a plan to detect and eliminate illicit discharges... into your small MS4	Sections 3.2.3.1.1 and 3.2.3.1.4	Monitor and update plan as necessary.
Ohio EPA REQUIREMENTS: To the extent allowable under State, Tribal or local law, effectively prohibit, through ordinance, or other regulatory mechanism, illicit discharges into your storm sewer system and implement appropriate enforcement procedures and actions	Section 3.2.3.1.3	Continue to follow up on citizen complaints and reported evidence of illicit discharges.
Ohio EPA REQUIREMENTS: Develop and implement a plan to detect and eliminate illicit discharges... into your small MS4	Sections 3.2.3.1.1 and 3.2.3.1.4	Follow up on possible illicit discharges identified in dry weather field screening.

**TABLE 2-4  
CITY OF MIDDLETOWN, OHIO  
PHASE II NPDES  
2009/2010 COMPLIANCE ACTIVITY GOALS  
MINIMUM CONTROL MEASURE 4**

<b>MINIMUM CONTROL MEASURE 4 CONSTRUCTION RUNOFF CONTROL</b>	<b>Ohio EPA General Permit Section Number</b>	<b>MEASURABLE GOALS YEAR 7</b>
Ohio EPA REQUIREMENT: Your program must include... Procedures for site plan review which incorporate consideration of potential water quality impacts	Section 3.2.4.1.4	Continue construction plan reviews.
Ohio EPA Requirement: Your program must include... An ordinance or other regulatory mechanism to require erosion and sediment controls, as well as sanctions to ensure compliance, to the extent allowable under State or local law	Section 3.2.4.1.1	Continue enforcement of Erosion and Sediment Control Rules and Regulations.
Ohio EPA REQUIREMENT: Your program must include... Requirements for construction site operators to implement appropriate erosion and sediment control BMPs... Procedures for site inspection and enforcement of control measures	Sections 3.2.4.1.2 and 3.2.4.1.6	Continue to use the checklist for the City's plan reviews.
Ohio EPA REQUIREMENT: Your program must include... Requirements for construction site operators to implement appropriate erosion and sediment control BMPs... Procedures for site inspection and enforcement of control measures	Sections 3.2.4.1.2 and 3.2.4.1.6	Continue incorporating inspectors into the standard plan review process in-house.
Ohio EPA REQUIREMENT: Your program must include... Requirements for construction site operators to implement appropriate erosion and sediment control BMPs... Procedures for site inspection and enforcement of control measures	Sections 3.2.4.1.2 and 3.2.4.1.6	Document plan compliance of installed BMPs through inspections.
Ohio EPA REQUIREMENT: Your plan must include... Procedures for receipt and consideration of information submitted by the public	Section 3.2.4.1.5	Continue to log storm water erosion complaints into the complaint tracking system.
Ohio EPA REQUIREMENT: Your program must include... Requirements for construction site operators to implement appropriate erosion and sediment control BMPs	Sections 3.2.4.1.2	Continue to make an updated set of storm water related ordinances available on the City's storm water website for contractors and developers.
Ohio EPA REQUIREMENT: Your program must include... Requirements for construction site operators to implement appropriate erosion and sediment control BMPs	Sections 3.2.4.1.2	Continue to make the City's Manual of Design available to contractors and developers.  The Manual of Design is currently posted on the City's engineering website.

**TABLE 2-5  
CITY OF MIDDLETOWN, OHIO  
PHASE II NPDES  
2009/2010 COMPLIANCE ACTIVITY GOALS  
MINIMUM CONTROL MEASURE 5**

<b>MINIMUM CONTROL MEASURE 5 POST CONSTRUCTION RUNOFF CONTROL</b>	<b>Ohio EPA General Permit Section Number</b>	<b>MEASURABLE GOALS YEAR 7</b>
Ohio EPA REQUIREMENT: Develop, implement, and enforce a program to address storm water runoff from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale, that discharge into your MS4 ...address storm water runoff from new development and redevelopment projects that disturb greater than or equal to one acre that discharge into the MS4. The program must ensure that controls are in place that would prevent or minimize water quality impacts.	Section 3.2.5.1.1	Enforce post-construction BMP maintenance aspects of Erosion and Sediment Control Rules and Regulations.
Ohio EPA Requirement: Develop and implement strategies which include a combination of structural and/or non-structural BMPs appropriate for the community	Section 3.2.5.1.2	Continue use of post-construction structural BMP guidance provided in the latest version of the ODNR Rainwater and Land Development manual.
Ohio EPA REQUIREMENT: Use an ordinance or other regulatory mechanism to address post-construction runoff from new development and redevelopment projects	Section 3.2.5.1.3	Enforce post-construction BMP maintenance aspects of Erosion and Sediment Control Rules and Regulations.
Ohio EPA REQUIREMENT: Ensure adequate long-term operation and maintenance of BMPs	Section 3.2.5.1.4	Enforce O&M plan requirements within the Erosion and Sediment Control Rules and Regulations.

**TABLE 2-6  
CITY OF MIDDLETOWN, OHIO  
PHASE II NPDES  
2009/2010 COMPLIANCE ACTIVITY GOALS  
MINIMUM CONTROL MEASURE 6**

<b>MINIMUM CONTROL MEASURE 6  POLLUTION PREVENTION &amp; GOOD HOUSEKEEPING</b>	<b>Ohio EPA General Permit Section Number</b>	<b>MEASURABLE GOALS YEAR 7</b>
Ohio EPA REQUIREMENTS: Develop and implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations.	Section 3.2.6.1.1	Continue to log job card data collected by maintenance crews.
Ohio EPA REQUIREMENTS: Develop and implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations.	Section 3.2.6.1.1	Continue to develop an O&M Manual for the Public Works and Utilities Department that provides procedures, documentation requirements, and schedules for pollution prevention and good housekeeping.
Ohio EPA REQUIREMENTS: Develop and implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations.	Section 3.2.6.1.1	Continue ongoing catch basin replacement effort.
Ohio EPA REQUIREMENTS: ...your program must include employee training 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.	Section 3.2.6.1.2	Continue to conduct annual training of Public Works and Utilities Department employees in aspects of pollution prevention/good housekeeping.
Ohio EPA REQUIREMENT: Ensure adequate long-term operation and maintenance of BMPs	Section 3.2.5.1.4	Maintain regional post-construction structural BMPs.