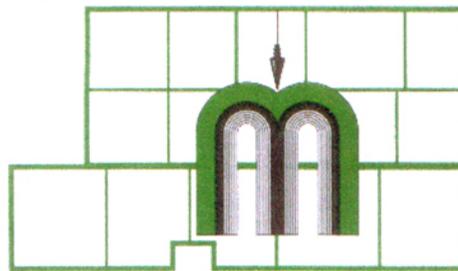


Mahoning County and Co-Permitted Entities,
Mill Creek Metroparks and the Townships of
Austintown, Beaver, Boardman, Canfield, Coitsville,
Poland, and Springfield

Storm Water Management Program
Annual Report
For
April 3, 2004 – April 3, 2005



MAHONING COUNTY

Authorization for Small Municipal Separate Storm Sewer Systems to Discharge Storm
Water under the National Pollutant Discharge Elimination System

Submitted to:
Ohio Environmental Protection Agency

Prepared by:



April 3, 2005

Table of Contents

Cover Letter

Certification Statement

Table of Contents	i
1.0 Introduction	1
1.1 Year 2 Annual Report (April 3, 2004-April 3, 2005)	1
1.2 Report Organization	1
1.3 Overview of Year 2 Storm Water Management Plan Activities.....	2
2.0 Mahoning County & Co-Permitted Entities' Municipal Separate Storm Sewer System (MS4)...	4
2.1 Regulated MS4 Area Summary Information.....	4
3.0 Summary of Year 2 Activities	6
3.1 Implementation and Program Status	6
3.2 Best Management Practices (BMPs).....	7
3.2.1 Compliance with Permit Conditions.....	7
3.2.2 Appropriateness Assessment.....	7
3.2.3 Water Quality Benefits	8
4.0 Mahoning County and Co-Permitted Entities Storm Water Management Program Contacts ...	9
4.1 Mahoning County Storm Water Management Program Contact	9
4.2 Mahoning County Consultant Contact.....	9
5.0 BMP Tables.....	10

List of Tables

Table 1. Co-Permitted Entities, Estimated Regulated Area Size and Watershed Location.....	4
Table 1. Mahoning River TMDL Summary.....	5

1.0 Introduction

1.1 Year 2 Annual Report (April 3, 2004-April 3, 2005)

This Annual Report serves as an evaluation of storm water management activities currently performed in Mahoning County and the co-permitted entities. This annual report is designed to:

Provide information regarding the development and implementation of storm water pollution prevention activities and Best Management Practices (BMP) conducted by Mahoning County and other entities.

Evaluate and assess the appropriateness and effectiveness of the Best Management Practices (BMPs) identified in the Storm Water Management Plan submitted to OEPA on March 10, 2003.

Document the Year 2 activities for Mahoning County and the co-permitted entities pursuant to their Storm Water Management Plan.

The Report is being submitted to fulfill the requirements of Section 4.3 Reports of Ohio Environmental Protection Agency's (OEPA) *Authorization for Small Municipal Separate Storm Sewer Systems to Discharge Storm Water under the National Pollutant Discharge Elimination System*, NPDES Permit No. OHQ000001. Coverage was granted by OEPA effective April 3, 2003.

1.2 Report Organization

The annual report has been structured so that it can be inserted into the Mahoning County Storm Water Management Plan (SWMP) either as an addendum or directly behind the Minimum Control Measure BMP tables and the Year 1 Annual Report.

A summary table format was developed so that each Best Management Practice (BMP) may easily be cross-referenced with Year 2- Objectives, Measurable Goals, Permit Compliance Status and Year 3- Objectives, Implementation activities, and modified current schedules.

The summary tables were developed so that the following elements can be added in future permit years:

- > Year 3 through 5 Annual Report and BMP activities,
- > Continued compliance with permit conditions,
- > BMP Appropriateness Assessment information,
- > Schedule and Measurable Goal updates and revisions,
- > Additional BMPs as they are identified and incorporated.

1.3 Overview of Year 2 Storm Water Management Plan Activities

Severe storm events resulted in major flooding in May and September 2004. Large areas of Mahoning County and its Townships were declared federal disaster areas. These floods clearly required the time and resources of County and Township staff, as funding assistance applications needed to be prepared and managed, and rescue and repair efforts undertaken. Subsequently BMP implementation and storm water management plan activity was limited. In some cases the flooding required revisions to the implementation schedules and measurable goals.

Mahoning County Engineers completed updates, revisions and reorganization of the sub-division drainage manual in Year 2. The *Mahoning County Drainage and Erosion and Sedimentation Control Manual* was developed to update County's sub-division drainage regulations to align these with the Ohio Environmental Protection Agency's Construction General Permit (CGP), and to modify current design storm requirements within the County in order to manage storm water runoff, reduce erosion and standardize designs to meet the permit requirements.

The Manual contains Erosion and Sedimentation control requirements based on the Storm Water Pollution Prevention Plans (SWPPP) identified in the CGP. The Mahoning County Soil and Water Conservation District played a key role in aligning current requirements, presenting modifications and finalizing the information that was included in the Manual.

Year 2 Annual Report includes information in the Year 3 objectives and implementation columns which provides the County, Townships and Metroparks with some steps to assist with BMP implementation and breaks down some of the more involved program elements.

Memoranda of Understanding (MOU's) have been completed for the Townships and Metroparks for the entire permit term. MOU's for the following will be completed annually:

- Mahoning County District Board of Health
- Building Inspection
- County Sanitary Engineer
- Planning Commission
- Soil and Water Conservation District

Mahoning County received OEPA comments on the submitted SWMP. This Annual report has incorporated responses to the recommendations forwarded in OEPA's plan review. Appendix A of this report provides a summary of the comments and where to find the replies in the report.

Mahoning County added 7 additional BMP's under the Post-Construction Storm Water Management in New Development and Redevelopment Minimum Control Measure:

Vegetated Swale and Filter Strips

Infiltration Trench

Extended Detention Basin (Dry)

Retention Basin (Wet)

Constructed Wetlands

Bio-retention

Alternatives

2.0 Mahoning County & Co-Permitted Entities' Municipal Separate Storm Sewer System (MS4)

2.1 Regulated MS4 Area Summary Information

Table 1 shows the number of square miles encompassed by each of the co-permittees MS4 regulated areas. While rural portions of the County are not served by sewers, the majority of the regulated area is seweraged.

Table 1 Co-Permitted Entities, Estimated Regulated Area Size and Watershed Location

SWMP Co-Permitted Entities	Area (miles ²)	Major Watersheds
Mahoning County	58	Mahoning River, Little Beaver Creek
Austintown Township	19.7	Mahoning River
Beaver Township	1.1	Mahoning River
Boardman Township	22.5	Mahoning River
Canfield Township	7.36	Mahoning River
Coitsville Township	0.12	Mahoning River
Poland Township	1.3	Mahoning River, Little Beaver Creek
Springfield Township	6.8	Mahoning River, Little Beaver Creek
Mill Creek Metro Park	4.06	Mahoning River
Total Estimated Regulated Area	120.93	

The storm water drainage system for Mahoning County and the Townships is a combination of ditches that run parallel to County and Township roads, and a limited number of closed pipe systems. The majority of the closed pipe systems are located in subdivisions. Mahoning County has identified a need to update the current sub-division drainage requirements to bring these into conformance with OEPA's Construction General Permit and the MS4 permit requirements. The sub-division updates are discussed in the Annual Report tables in section 5.0.

The SWMP program area lies generally in the area of northeast Ohio. Mahoning County covers 424 square miles. The Mahoning River watershed (including major tributaries Yellow Creek, Mill Creek and Crab Creek) is the major watershed in the County, draining approximately 2/3 of the county. Two rather small portions of the southern 1/3 of the County, including portions of Poland and Springfield Townships, lie within the Little Beaver Creek watershed. Total maximum daily Loads (TMDLs) have been developed for streams in the area. Information on these TMDLs is shown in Table 2.

Table 2 –Mahoning River TMDL Summary

Stream/Watershed Name: Mahoning River			
Assessment Unit Numbers: 05030103- 040, 050, 070, 080			
Assessment Unit Stream Names	Assessment Number	Causes	Sources
Eagle Creek	05030103 - 040	Bacteria	HSTS
Duck Creek to Eagle Creek	05030103 - 050	Bacteria	HSTS
Duck Creek	05030103 - 050	Bacteria	HSTS
Mosquito Creek	05030103 - 070	Bacteria	HSTS
Mud Creek	05030103 - 070	Bacteria	HSTS
Meander Creek	05030103 - 070	Bacteria	HSTS
Squaw Creek	05030103 - 070	Bacteria	HSTS
Mill Creek	05030103 - 080	Bacteria	HSTS
Crab Creek	05030103 - 080	Bacteria	HSTS
Yellow Creek	05030103 - 080	Bacteria	HSTS

Faced with unique challenges with selecting, implementing and evaluating or assessing BMPs, the Year 2 Annual Report presents data (both qualitative, and where available, quantitative data) to document permit compliance. BMP appropriateness assessments are covered in Sections 3.2.1 and 3.2.2, which provides supporting information to document annual report requirements (under permit section 4.3.1- Reporting).

Mahoning County and the co-permittees are reviewing the value associated with implementing the identified Best Management Practices on a county-wide basis. The County has taken a step in that direction with the development of the updated Drainage Manual, which will be implemented on a county wide basis. The will evaluate issues associated with implementing the manual county wide and apply this to consideration of applying the SWMP county wide.

3.0 Summary of Year 2 Activities

3.1 Implementation and Program Status

Mahoning County's Storm Water Management Plan incorporated approximately 36 storm water management BMPs, which affected a significant portion of the permittee's services, departments and operations and maintenance (O/M) procedures. In addressing the requirement regarding updating and revising our implementation schedules, unless otherwise noted in the Annual Report tables, the revised implementation schedule date will be April 3, 2006.

During Year 2 the Mahoning County Engineer's Office developed Erosion & Sediment Control Regulations (Regulations) and updated the Mahoning County Drainage Criteria Manual (Manual). In response to Ohio Environmental Protection Agency (OEPA's) storm water regulatory requirements (MS4-Phase II) and recurring significant flooding events within Mahoning County, the Mahoning County Engineer's Office updated the Regulations and Manual as a tool to guide drainage designs, erosion and sediment controls, post-construction runoff controls, and storm water management for development and construction activities within Mahoning County. The County Board of Commissioners is expected to adopt the Regulations and the Manual in spring of 2005.

Three primary factors have contributed to the limited implementation of some BMPs during Year 2. 1.) Mahoning County experienced substantial flooding in May and September, 2004. Responding to these widespread, recurring problems required the County and Townships to redirect services, funds, personnel from BMP implementation. These events had a significant impact on SWMP BMP implementation. 2.) Recognition of the need to develop cost analyses (as discussed above) to attempt to secure funds to complete these program tasks. 3.) Limited staff time was available to dedicate to this program. Notwithstanding these three factors, progress has been made toward BMP implementation and meeting compliance conditions to the Maximum Extent Practical (MEP), as outlined in permit section 4.3.3.

During 2004 Mahoning County was declared a Federal Disaster on two occasions due to severe flooding after abnormally large rainfall events. FEMA-1519-DR was the result of excessive rainfall events which occurred toward the end of May and FEMA-1556-DR was the result of significant flooding due to the remnants of Hurricane Ivan, Hurricane Francis, and Hurricane Charley. Substantial property and structural damage occurred and resources were redirected for the recovery efforts.

3.2 Best Management Practices (BMPs)

3.2.1 Compliance with Permit Conditions

As required by permit, the BMPs, measurable goals and compliance status have been addressed in the Annual Report Tables in section 5.0. The intent was to document permit compliance with Storm Water Management Plan activities performed during year 2.

Permit compliance was based on the following key points:

- Was the BMP implemented?
- Were any quantitative data collected for reporting?

These questions were asked to determine BMP permit compliance. To the maximum extent practical, the Year 2 implementation schedule for all 36 BMPs was followed. During Year 2, the County found that several BMPs required further review of costs to implement. Some required refinements of the implementation approach, others require dedicated funding, and still others could require additional staff resources. These all had a direct impact on compliance with permit conditions and implementation schedules.

3.2.2 Appropriateness Assessment

Minimum Control Measures and BMPs included in the SWMP are to be evaluated or assessed for appropriateness towards achieving the statutory goal of reducing the discharge of pollutants to the Maximum Extent Practical. Given the limited information and the short time in which these BMP's have been in place, the County believes it is not possible to effectively evaluate the appropriateness of the BMP's. For those BMPs that have been implemented and for which performance data collection is under way, these assessments will likely begin late in Year 3. Some of the potential assessment factors that are pending review are:

- Life cycle costs compared to the benefits.
- Functionality of the BMP.
- Level of maintenance required to ensure functionality of selected BMPs.
- Physical site location criteria for structural BMPs.
- Review of other performance data for similar BMPs from other counties.

Mahoning County's primary goal is to implement, operate and maintain productive and efficient BMPs. A secondary goal is to avoid focusing limited labor and financial resources on BMPs that may involve excessive construction, maintenance, reporting or are determined to be ineffective. The Annual Report tables present quantitative data where available as an initial step towards documenting BMP performance that will in turn allow the appropriateness assessments to be conducted per BMP. The Year 2

quantitative data collected primarily involve the BMPs associated with the Pollution Prevention/Good Housekeeping Minimum Control Measure.

3.2.3 Water Quality Benefits

Mahoning County's Storm Water Management Plan and the updated Drainage Manual form the foundation of the County's Storm water drainage and water quality programs. The SWMP acts to unify a wide variety of County programs, such as training, operations and maintenance and construction, under a common focus on water quality issues. The water quality benefits of our BMPs are supported by research or common sense approaches to reducing storm water pollution within the framework of the County's organization and mission.

Progress in reducing storm water pollution continues to be exhibited by our Year 2 accomplishments and the evolution of our Storm Water Management Program. Section 5.0 of this report, which lists specific accomplishments and implementation activities for all 36 BMPs, is a demonstration of our significant efforts to reduce and prevent storm water pollution.

4.0 Mahoning County and Co-Permitted Entities Storm Water Management Program Contacts

4.1 Mahoning County Storm Water Management Program Contact

Primary Contact: Ms. Marilyn Kenner, P.E.
Chief Deputy County Engineer
Mahoning County Engineers Office
940 Bears Den Road
Youngstown, Ohio 44511-1299
Phone Number: 330-799-1581

Secondary Contact: Mr. Tim Burkert, P.E.
Design and Construction Engineer
Mahoning County Engineers Office
940 Bears Den Road
Youngstown, Ohio 44511-1299
Phone Number: 330-799-1581

4.2 Mahoning County Consultant Contact

Consultant: URS Corporation

Primary Contact: Mr. Mark McCabe
Project Manager
277 West Nationwide Blvd.
Columbus, Ohio 43215
Phone Number: 614-464-4500

Secondary Contact: Mr. Tom Denbow
1375 Euclid Avenue .
Cleveland, Ohio 44113
Phone Number: 216-622-2400

5.0 BMP Tables

MAHONING COUNTY YEAR 2 ANNUAL REPORT
Table 1: Public Involvement/Participation Minimum Control Measures 1&2

ID	Best Management Practice	Permit Year 2004 Year 2 Objectives and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objectives	Year 3 BMP Implementation Activity
1.1	<p>County Storm Water Committee Committee participants: County Engineer, Mahoning County District Board of Health, County Planning Commission, Soil & Water Conservation District (SWCD), Sanitary Engineer, Prosecutor's Office, Board of Commissioners, and Mill Creek Metro Park, and County Building and GIS departments.</p>	<ol style="list-style-type: none"> Storm Water Committee met four (4) times during Year 2 (2004). Key Committee activities in Year 2: <ul style="list-style-type: none"> Reviewed revisions associated with the Drainage Criteria Manual. Manual revisions included Erosion and Sediment control regulations. Model zoning regulations were reviewed and discussed. 	<ol style="list-style-type: none"> County Storm Water Committee met four(4) times throughout Year 2: <ul style="list-style-type: none"> AWARE Meetings Annual Township Meetings- January 2005 	<ol style="list-style-type: none"> Revised Drainage Criteria Manual – Target Audience – developers, local consulting firms, builders – Permit sections 3.2.1.2.2 and 3.2.1.2.3. Revised Drainage Criteria Manual incorporated Erosion and Sedimentation control regulations- Permit section 3.2.1.2.4. 	<ol style="list-style-type: none"> Storm Water Committee will meet at a minimum of four times during permit Year 3. Draft outline which will address how Storm Water Committee will evaluate and assess appropriateness of SWMP BMPs as required by permit section 4.3.1 and 3.2.1.2.7 Document meeting minutes and storm water program decisions. Record dates and times of meetings. Determine targeted pollutants for Year 3 focus. Determine how BMP will be evaluated and assessed. Document assessment rationale for reporting in Year 3. 	<ol style="list-style-type: none"> Review, assess and evaluate implementation and appropriateness of BMPs. Discuss and document program storm water issues. Review and document progress at mid-point of Year 3 of permit term. Draft BMP assessment outline. Determine targeted pollutant: Sediment – recommended.
1.2	<p>Public and Private Involvement Note: BMP name change</p>	<ol style="list-style-type: none"> Developed draft workshop schedule and documented Workshops held in 2004: Completed Memoranda of Understanding (MOUs) with all co-permittees. MOUs with Townships are signed annually. 	<ol style="list-style-type: none"> Year 3 MOUs were developed and signed with: <ul style="list-style-type: none"> Mahoning County District Board of Health Building Inspection Mahoning County Board of Commissioners & Mill Creek Metropolitan Park District County Sanitary Engineer Planning Commission Soil and Water Conservation District (These MOUs have been signed for the entire permit term). Townships – Austintown, Beaver, Boardman, Canfield, Coitsville, Poland and Springfield. (These MOUs 	<ol style="list-style-type: none"> MOUs better defined the target audience – permit section 3.2.1.2.3 and 3.2.2.2.3 	<ol style="list-style-type: none"> Document workshops, number in attendance, location, date and time. Based on MOU agreements, determine the responsible parties for each BMP or portion of BMPs. Also determine further how implementation is being tracked and recorded. Recommend developing a BMP implementation responsibility table by MOU. Determine how to track and record BMP implementation status at Township level, Mill Creek Metroparks and County SWMP Determine how BMP will be evaluated and assessed. Document assessment rationale for reporting in Year 3. 	<ol style="list-style-type: none"> Complete workshop format and material development. Develop preliminary workshop schedules. Continue to seek public input and involvement on the implementation of the SWMP through public education and BMP workshops.

MAHONING COUNTY YEAR 2 ANNUAL REPORT
Table 1: Public Involvement/Participation Minimum Control Measures 1&2

ID	Best Management Practice	Permit Year 2004 Year 2 Objectives and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objectives	Year 3 BMP Implementation Activity
			<p>are signed annually).</p> <p>2. Public comment period held for Mahoning County Drainage Criteria Manual and Erosion & Sediment Control Regulations published in <i>Youngstown Vindicator</i>. No comments recorded.</p>			
1.3	Newsletters	<p>1. Mahoning County SWCD Education Newsletter – published 3X/year during the school year. Distributed twice annually to 2,300 teachers and 300 Educational Newsletters placed in public Library.</p> <p>2. <i>Mahoning Matters</i>: Quarterly publication of Mahoning SWCD – distributed to 104,686 county residents.</p> <p>3. <i>Pipeline</i> – published twice a year by County Sanitary Engineer – distributed to 44,000 households</p> <p>4. Articles on implementation of storm water program elements and specific storm water issues have been prepared to keep public informed about the program and increase awareness on specific issues and ways the public can assist in reducing pollutant loadings to area watersheds.</p>	<p>1. “Storm Water & Water Use” was printed and circulated to students.</p> <p>2. <i>Mahoning Matters</i> – Title of Article printed in 2004.</p> <p>3. <i>Pipeline</i>- Title of article printed in 2004.</p>	<p>1. BMP 1.3 addresses permit section 3.2.1.2.5.</p> <p>Due to budget constraints within the county, the SWCD staff hours were reduced. The Education Specialist resigned; consequently, educational programs have been dramatically cut.</p>	<p>1. Draft updated article on storm water within Mahoning County for <i>Mahoning Matters</i>.</p> <p>2. Draft updated article on storm water within Mahoning County for <i>Pipeline</i>.</p> <p>3. Review “Storm Water & Water Use” educational brochure and update information for Year 3.</p> <p>4. Determine how BMP will be evaluated and assessed.</p> <p>5. Document assessment rationale for reporting in Year 3.</p>	<p>1. SWCD will continue to print quarterly articles in <i>Mahoning Matters</i></p> <p>2. Annual coverage in <i>Pipeline</i> in partnership with the Mahoning County Sanitary Engineers</p>

MAHONING COUNTY YEAR 2 ANNUAL REPORT
Table 1: Public Involvement/Participation Minimum Control Measures 1&2

ID	Best Management Practice	Permit Year 2004 Year 2 Objectives and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objectives	Year 3 BMP Implementation Activity
1.4	Storm Water Education Programs: 1. <u>Soil & Water Conservation District:</u> 2. <u>Green Team</u>	1. <u>Soil & Water Conservation District:</u> a. Envirothon- not sponsored in Year 2. Students developed preliminary training sessions for Envirothon. b. Soil and Water Stewardship Activity books – Limited number were available upon request in 2004. c. Conducted demonstration models in 2 school districts – 2003 to 2004. Staffing issues for 2004 to 2005 will not allow for demonstration models to be performed. d. Contributed technical advice and text to Erosion and sedimentation control section of County Drainage Manual. e. Conducted Phase II mini-workshops – as requested. 2. <u>Green Team</u> a. Classroom and youth group presentations completed. Estimated number attended = 395 classroom presentations, estimated 9786 students. b. Teacher curriculum workshops completed. Estimated number of workshops = 6 An estimated 152 attendees. c. Waste assessment activities for small businesses completed. Estimated number of Business Assessed = 12	1. <u>Soil & Water Conservation District:</u> a. Envirothon- sponsored by the Soil and Water Conservation District at middle and high schools. b. Activity books were supplied to all the students served by in-class presentations. c. Demonstration model were utilized in the school districts. d. Mahoning County Soil and Water Conservation District staff and Engineers conducted education programs. 2. <u>Green Team</u> a. Classroom presentations completed Year 2. b. Teacher curriculum completed Year 2. c. Waste Assessment criteria established and implemented Year 2. d. Tour/Field trips conducted in Year 2. e. Recycling program documented and performed in Year 2. f. Special collection days scheduled and held Year 2.	1. BMP 1.4 address permit sections 3.2.1.2.3, 3.2.1.2.5 and 3.2.2.2.4 2. SWCD will not sponsor an Envirothon in Year 3. 3. Demonstration models will not continue to be part of in-school presentations in Year 3 due to SWCD staffing shortfalls. 4. No programs are to be conducted in the 2004-05 school year due to SWCD staffing shortfalls. 5. <u>Green Team</u> 5a. BMP 1.4 address permit sections 3.2.1.2.3, 3.2.1.2.5 and 3.2.2.2.4.	1. <u>Soil & Water Conservation District:</u> a. Activity books will continue to be available on a limited basis for teacher/educator pickup at the SWCD office. b. Workshops (at least two) will be provided to outline newly-adopted county regulations regarding drainage and erosion and sediment control. c. Assess options to backfill reduction of MCSWCD ability to provide educational options, brochures, mini-workshops. d. Determine how BMP will be evaluated and assessed. e. Document assessment rationale for reporting in Year 3. 2. <u>Green Team</u> a. Continue classroom and youth group presentations and document attendance. b. Continue teacher curriculum workshops. c. Continue waste assessment activities for small businesses. Begin documentation of program goals, waste reduction documented and summary of programs. d. Continue scheduling Tours/Field Trips.	1. <u>Soil & Water Conservation District:</u> a. Budget constraints within the county SWCD staff hours were reduced. Educational Items 1-4 will be addressed and an approach documented. b. Resolution from the Mahoning County Commissioners adopting the revised/updated Drainage Criteria and Erosion & Sediment Control Manual will be in place by April 2005. 2. <u>Green Team</u> a. Estimated 350 classroom and youth group presentations. b. Estimated 4 teacher curriculum workshops c. Estimated 10 targeted waste assessment activities for small business. d. Estimated 5 targeted tours/ field trips e. Estimated 1 cash for cans, 2 school paper programs, 20 adopt - a - spot. f. Estimated 1 Household Hazardous Waste

MAHONING COUNTY YEAR 2 ANNUAL REPORT
Table 1: Public Involvement/Participation Minimum Control Measures 1&2

ID	Best Management Practice	Permit Year 2004 Year 2 Objectives and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objectives	Year 3 BMP Implementation Activity
1.4 cont.	3. <u>Mahoning County District Board of Health.</u>	<p>assessments conducted.</p> <p>d. Tours/Field Trips conducted. Type and number attended : Field Trip type – 11 held Attendance -</p> <p>e. Cooperative recycling Waste education programs to reduce litter. Summary of collection effort = 17,237 lbs.</p> <p>f. Special Collection Days: Collections: HHW =212,969 lbs. E-Collection =133,483 lbs. Appliance =265,680 lbs. Christmas Tree =93,725 lbs Christmas Wrap & Card =3,155 lbs Household Battery = 1200.</p> <p>3. <u>Mahoning County District Board of Health</u></p> <p>a. Provided video and information to owners of every new septic system detailing how it works and proper maintenance; including the effects of failing systems on surface and groundwater.</p>	3. <u>Mahoning County District Board of Health</u>	6. <u>Mahoning County District Board of Health</u> 6a. BMP 1.4 address permit sections 3.2.1.2.3, 3.2.1.2.5 and 3.2.2.2.4.	e. Continue cooperative recycling and education programs to reduce litter. Record collected amounts. f. Continue Special Collection Days- g. Determine how BMP will be evaluated and assessed. h. Document assessment rationale for reporting in	collection, 1 E collection, 1 Appliance collection, 1 Christmas tree collection, 1 Christmas wrap and card collection.
		<p>3. <u>Mahoning County District Board of Health</u></p> <p>a. Provided video and information to owners of every new septic system detailing how it works and proper maintenance; including the effects of failing systems on surface and groundwater.</p>	<p>3. <u>Mahoning County District Board of Health</u></p> <p>a. Septic system informational packet was provided to 259 owners of new septic systems. The packet contained a video and other written material to detail how a septic system works, the proper maintenance of a septic system and the effects of a failing system.</p> <p>b. Other educational programs included:</p> <p>c. Three 2 hour presentations for septic system installers.</p> <p>d. One 2 hour presentation for septic system pumpers.</p> <p>e. One presentation for area realtors.</p> <p>f. 5918 mailings to remind</p>		3. <u>Mahoning County District Board of Health</u> will continue to provide Video and information to owners of every new septic system detailing how it works and proper maintenance; including the effects of failing systems on surface and groundwater.	3. <u>Mahoning County District Board of Health</u>
					a. Document from County Health Department numbers of video viewings.	

MAHONING COUNTY YEAR 2 ANNUAL REPORT
Table 1: Public Involvement/Participation Minimum Control Measures 1&2

ID	Best Management Practice	Permit Year 2004 Year 2 Objectives and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objectives	Year 3 BMP Implementation Activity
	4. <u>Home Builders Association and Local Developers.</u>	4. <u>Home Builders Association and Local Developers:</u> a. Erosion and sediment control BMP training video was used in the course of training during Year 1 and will continue to be available to members of the HBA. b. Mahoning County completed Drainage Manual revisions for use by HBA and local developers .	owners of septic systems to have their tanks pumped. g. Provided educational instruction of wastewater to resident physicians from area hospitals. 4. <u>Home Builders Association and Local Developers:</u> a. 1- Erosion and sediment control BMP training was provided by SWCD to members of the HBA and Local developers.	7. <u>Home Builders Association and Local Developers</u> 7a. BMP 1.4 address permit sections 3.2.1.2.3, 3.2.1.2.5 and 3.2.2.2.4.	4. <u>Home Builders Association and Local Developers</u> a. Complete Erosion and sediment control BMP training video update. Update to capture complete Drainage Manual elements. b. Conduct workshop on Updated Drainage manual.	4. <u>Home Builders Association and Local Developers</u> a. Document number of HBA attendees at video showing. Note date times and locations shown.
1.5	Web Site	1. Storm water web page was scheduled to be completed in Year 2. Remains under construction. Revised completion schedule is to complete in Year 3. 2. Links will include: a. County web site. b. SWCD web site. c. Green Team web site. d. Mill Creek Metro Parks web site. e. AWARE web site. f. Mahoning County District Board of Health web site. g. Sanitary Engineers web site. h. Other agency web sites (OEPA, ODNR,	1. Storm Water Management page is still under construction. The web page will be completed when the final constructions site regulations are completed. 2. District Board of Health website, though it contains many health related topics in addition to wastewater, experienced 557,720 hits and 75,190 visits in 2004.	1. BMP 1.5 addresses permit sections 3.2.1.2.3, 3.2.1.2.5, 3.2.2.2.4 and 4.3.1 (Reporting).	1. Complete Mahoning County's and co-permittees storm water management web-page. 2. Up-load PDF version of Storm water Management plan and initial regulated area maps. 3. Develop schedule and procedures by which to rotate out old website information to archive. 4. Identify articles. Links and other storm water related material to place on website. 5. District Board of Health continues to maintain and update the Mahoning-health.org website as	1. Document date website is operational. 2. Document number of web site visits. 3. Complete schedule of material updates. 4. District Board of Health will continue to maintain, update, and track the number of hits the Mahoning-health.org website.

MAHONING COUNTY YEAR 2 ANNUAL REPORT
Table 1: Public Involvement/Participation Minimum Control Measures 1&2

ID	Best Management Practice	Permit Year 2004 Year 2 Objectives and Achievements etc.)	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objectives	Year 3 BMP Implementation Activity
					needed. 6. Determine how BMP will be evaluated and assessed. 7. Document assessment rationale for reporting	
1.6	Community activities	1. Mahoning County Storm Water Management BMP information was made available at the following community event in Year 2: a. Earth Day b. AWARE Annual Watershed festival was canceled. c. Mill Creek Metroparks- Annual litter clean up event. d. County Fair	1. Storm Water Management BMP information was made available at the following community event in Year 2: a. Earth Day Clean-up, coordinated by YSU, HM Health, and AWARE b. AWARE Annual Watershed Festival was canceled c. Mill Creek Metro Parks annual litter/trash clean up. d. Canfield (county) Fair, displays on SWM BMPs were placed in the County tent.	1. BMP 1.6 addresses permit sections 3.2.1.2.3, 3.2.1.2.5 and 3.2.2.2.	1. Storm Water Management BMP information will be made available at the following community events in Year 3: a. Earth Day b. AWARE Annual Watershed festival. c. Mill Creek Metroparks- Annual litter clean up event. d. County Fair 2. Determine how to track attendance figures 3. Determine how BMP will be evaluated and assessed. 4. Document assessment rationale for reporting	1. Work with AWARE on the Earth Day activities. 2. Form an outreach committee to develop updated materials for Year 2 displays and informational literature. Develop schedule to complete material updates. 3. Identify partners from Storm Water Management Committee to attend each event. 4. Develop method to track and document number participating.
1.7	Brochures, Flyers, Fact sheets, and Handouts (Permit section 3.2.1.2.5)	1. Completed and made available brochures, flyers, fact sheets and handouts at the following locations: o Mahoning County SWCD o Board of Mahoning County Commissioners Office o Mahoning County Green Team o Mahoning County Sanitary Engineers o Building Department b. Township administration Buildings 2. Mahoning SWCD – BMP Pocket Guide for contractors was not completed in Year 2. 3. Mahoning County District Board of Health packet on on-site treatment systems.	1. Brochures, flyers, fact sheets and handouts were made available and displayed. 2. District Board of Health mailed information about on-site wastewater treatment systems (OSU Extension Fact Sheet, AEX-740-01) and the need to pump septic tanks to 5,918 owners of septic systems.	1. BMP 1.4 address permit sections 3.2.1.2.3, 3.2.1.2.5 and 3.2.2.2.4.	1. Brochures, flyers, fact sheets and handouts will be updated and restocked quarterly in the following locations: o Mahoning County SWCD o Board of Mahoning County Commissioners Office o Mahoning County Green Team o Mahoning County Sanitary Engineers o Building Department o Township administration Buildings 2. Mahoning SWCD – BMP Pocket Guide for contractors will be available during Year-3. 3. District Board of Health will continue to mail information about on-site wastewater	1. Supply brochures, flyers, fact sheets and handouts at quarterly SWMP Committee meetings for updating. 2. Supply literature at Township Trustee meetings for township administration buildings. 3. Document current storm water themes or messages used on storm water education materials to date. 4. Identify additional themes and message to be included on educational material, brochures, fact sheets. OEPA recommends

MAHONING COUNTY YEAR 2 ANNUAL REPORT
Table 1: Public Involvement/Participation Minimum Control Measures 1&2

ID	Best Management Practice	Permit Year 2004 Year 2 Objectives and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objectives	Year 3 BMP Implementation Activity
					treatment (HSTS). 4. Mahoning County will review and identify a minimum of 1 additional mechanism to encourage, educate or allow for continued public involvement with storm water management with in the county. 5. Determine how to assess percentage of population reached. OEPA recommends minimum of 50%. 6. Create system for updating and re-supplying literature in the venues. 7. Determine how BMP will be evaluated and assessed. 8. Document assessment rationale for reporting.	

MAHONING COUNTY YEAR 2 ANNUAL REPORT
Table 2: Illicit Discharge Detection and Elimination Minimum Control Measure 3

ID	Best Management Practice	Permit Year 2004 Year 2 Objectives and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
3.1	Map storm sewer system	1. Severe flooding, in May and September 2004, federal disaster assistance was approved for citizens and local governments for Mahoning County. Year 2 – System Mapping was rescheduled for Year 3. The County will initiate storm sewer system mapping and inventory preparation activities in Year 3- scheduled completion date in permit Year 5.	1. Severe flooding, in May and September 2004, federal disaster assistance was approved for citizens and local governments for Mahoning County. Year 2 – System Mapping was rescheduled for Year 3. The County will initiate storm sewer system mapping and inventory preparation activities in Year 3 - scheduled completion date in permit Year 5.	1. BMP will address permit section 3.2.3.1.2 and 3.2.3.2.1 2. BMP Assessment here will be based on percent complete per Year between Year 3 and Year 5.	1. Outline System inventory approach/sequence and schedule. 2. Develop inventory protocols. 3. Determine how and where outfall inventory data will be stored. 4. Determine how inventory data will be linked with County GIS mapping to create “Storm Sewer Base Map”. 5. Determine system attributes to be collected. 6. Consider including “Simple” dry weather screening activities (color, odor, presence of flow) which can be easily performed during inventory as a method to begin identification of potential illicit discharge locations.	1. Begin inventory. 2. Complete base map for use in inventory. 3. Document process (Protocol). 4. Draft revised completion schedule. 5. Address the dry weather screening issue.
3.2	List/Map/ Record outfall locations of HSTS: Mahoning County District Board of Health to map location of all HSTS connected to storm sewer system including identifying all discharge locations of off-lot discharging systems to County storm sewer drainage system using GPS.	1. Completed MOU and acquired signature to address OEPA SWMP review comment associated with permit section 3.2.3.2.6 2. Continue working with County Health Department to collect HSTS outfall location data. 3. Develop a schedule with which to collect County Health Dept. HSHS data for importing.	1. District Board of Health (DBoH) has an existing list of HST permitted locations by address back to 1997. 2. Working in conjunction with DBoH a comprehensive list of all HSTS's will be completed. 3. County Engineer is working with DBoH to develop schedule to meet the permit deadline.	1. BMP addresses permit section 3.2.3.1.2.1.1, 3.2.3.1.2.1.2, 3.2.3.2.1 and 4.3.1. 2. BMP Assessment here will be based on percent complete per year between Year 3 and Year 5.	1. Develop HSTS inventory schedule. 2. Review current DBoH HSTS information. Assess by percentage amount which is complete and percentage which needs to be completed. 3. Determine how current HSTS data will be integrated into GIS and then to into Base Map. 4. Begin developing master list of all HSTS located within MS4 regulated program area. 5. Work with DBoH to determine and document	1. Develop HSTS GIS layer coverage. Overlay onto GIS Storm Water Base map. 2. Determine how to integrate 1997 to present HSTS permitted outfall data. Determine format or types of data. 3. Determine format of master list. The format should be able to be imported into existing County - GIS platform. 4. Draft or modify HSTS inventory protocols. 5. Document HSTS mapping update

MAHONING COUNTY YEAR 2 ANNUAL REPORT
Table 2: Illicit Discharge Detection and Elimination Minimum Control Measure 3

ID	Best Management Practice	Permit Year 2004 Year 2 Objectives and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
					the following: a. How new permitted HSTS systems will be added to the master list and inventoried. b. Frequency of updates. c. Party responsible for maintaining Master HSTS list and location of list. 6. Determine the frequency and schedule under which the Base Map will be updated. 7. Review current DBoH illicit discharge protocols as a potential model. 8. Consider including "Simple" dry weather screening activities (Color, odor, presence of flow) which can be easily performed during HSTS inventory as a method to begin identification of potential illicit discharge locations.	responsibilities.
3.3	Develop program to detect and eliminate illicit discharges	1. Severe flooding, in May and September 2004, federal disaster assistance was approved for citizens and local governments for Mahoning County. Year 2 – System Mapping was rescheduled for Year 3. The County will initiate storm sewer system mapping and inventory preparation activities in Year 3- scheduled completion date in permit Year 5.	1. Severe flooding, in May and September 2004, federal disaster assistance was approved for citizens and local governments for Mahoning County. Year 2 – System Mapping was rescheduled for Year 3. The County will initiate storm sewer system mapping and inventory preparation activities in Year 3- scheduled completion date in permit Year 5.	1. BMP 3.3 addresses permit sections: ✓ 3.2.3.1.3 ✓ 3.2.3.1.4 ✓ 3.2.3.1.5 ✓ 3.2.3.2.2 ✓ 3.2.3.2.3 ✓ 3.2.3.2.4 ✓ 3.2.3.2.4.1 ✓ 3.2.3.2.4.2 ✓ 3.2.3.2.4.3 ✓ 3.2.3.2.4.4 2. Wastewater discharges that are identified during any inspection are required to be corrected to comply with	1. Begin development of Illicit Discharge Ordinance. Outline suggested enforcement procedures. (3.2.3.1.3 and 3.2.3.2.3). Develop draft schedule for implementation. SWMP comment- OEPA recommends ordinance include language for access to private property to investigate illicit discharges. 2. Develop preliminary Illicit Discharge Elimination Plan (IDEP). Plan should include procedures for detection	1. Work with County Commissioners to complete and obtain approval of Illicit Discharge Ordinance. 2. Work with County Sanitary Engineer, District Board of Health, Townships and Mill Creek Metroparks to draft both Illicit Discharge Ordinance language and to outline the IDEP program for the County. 3. Determine the following: ✓ Champion for IDEP

MAHONING COUNTY YEAR 2 ANNUAL REPORT
Table 2: Illicit Discharge Detection and Elimination Minimum Control Measure 3

ID	Best Management Practice	Permit Year 2004 Year 2 Objectives and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
				<p>Section 2 part C,D,E,F, & G of the Regulation of Household Sewage Disposal Systems.</p> <p>3. Off-lot discharges are permitted for wastewater when an on-lot system can not be installed and the off-lot system is installed to comply with the Regulations of Household Sewage Disposal Systems Section 2 part G.</p>	<p>and process for removal and reporting. IDPE should include schedule and implementation steps. (3.2.3.1.4, 3.2.3.2.2, 3.2.3.2.4)</p> <p>3. Develop IDEP program fact sheet for public and employee use. (3.2.3.1.5)</p> <p>4. Develop preliminary Dry Weather Screening plan. Plan will need to address the following (3.2.3.2.4.1 and 3.2.3.2.4.2):</p> <ul style="list-style-type: none"> ✓ Schedule- Consider including "Simple" dry weather screening activities (color, odor, presence of flow) which can be easily performed during Outfall and HSTS inventory as a method to begin identification of potential illicit discharge locations. ✓ Process for prioritizing "Hot Spot" areas. OEPA SWMP comment- Prioritize areas with older or no sanitary service. ✓ Schedule – OEPA SWMP comments indicate screening should be 100% complete during first permit term. <p>5. Develop general procedures for removing identified illicit discharges. OEPA SWMP comment- Removal process</p>	<p>program.</p> <ul style="list-style-type: none"> ✓ Where IDEP will be filed and how will data be linked with County GIS. ✓ Determine whether the Dry Weather Screening will be performed during inventories. ✓ Complete schedule ✓ How will OEPA recommended 100 % dry weather screening be completed between Year 3 and Year 5. ✓ Draft NOV form. ✓ Evaluation process.

MAHONING COUNTY YEAR 2 ANNUAL REPORT
Table 2: Illicit Discharge Detection and Elimination Minimum Control Measure 3

ID	Best Management Practice	Permit Year 2004 Year 2 Objectives and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
					<p>should include one (1) written Notice of Violation (NOV), provides time frame for elimination. (3.2.3.2.4.3)</p> <p>6. Determine storage location for collected IDEP information, elimination data, and follow up actions.</p> <p>7. Develop BMP evaluation/assessment criteria or procedures. Document status for annual report in Year 3. OEPA SWMP comment- IDEP program should log or similar tracking method and status of removal.</p> <p>8. Determine how the BMP will be evaluated and assessed.</p> <p>9. Document assessment rationale for reporting.</p>	
3.4	<p>Adopt regulations prohibiting illicit discharges</p>	<p>1. Began Ohio Revised Code (ORC) research to determine the extent of the County's authority to implement regulations related to illicit discharge.</p>	<p>1. Based on research results. Regulation/ordinance should include or address the following:</p> <ul style="list-style-type: none"> ✓ Prohibition of Illicit discharges and illegal dumping. ✓ Enforcement ✓ Private property access for investigative purposes to determine illicit source. ✓ First offense warning-NOV. 	<p>1. See BMP 3.3 for permit sections.</p>	<p>1. Complete research. See BMP 3.3 for sequence details.</p> <p>2. Draft summary of findings document.</p> <p>3. Prepare draft Illicit Discharge regulation including:</p> <ul style="list-style-type: none"> ✓ Prohibition of Illicit discharges and illegal dumping. ✓ Enforcement ✓ Private property access for investigative purposes to determine illicit source. ✓ First offense warning-NOV. <p>4. Determine how BMP will be</p>	<p>1. Present Draft Illicit Discharge regulation to Storm water committee for review and comment.</p> <p>2. Revised regulation based on comments.</p> <p>3. Schedule meeting with County Commissioners to present draft regulation.</p> <p>4. Follow regulation adoption process to achieve passage of draft regulation(s).</p>

MAHONING COUNTY YEAR 2 ANNUAL REPORT
Table 2: Illicit Discharge Detection and Elimination Minimum Control Measure 3

ID	Best Management Practice	Permit Year 2004 Year 2 Objectives and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
					evaluated and assessed. 5. Document assessment rationale for reporting.	
3.5	<p>Total Maximum Daily Load (TMDL) (OEPA Permit Section 1.3.6): County and Township procedures should be able to demonstrate how they determined the amount of pollutant needed to be reduced within the impaired stream segment(s), and how much pollutant was reduced (i.e., water sampling to verify the amounts removed).</p>	<ol style="list-style-type: none"> 1. A table was completed identifying approved and pending TMDLs within Ohio. 2. Preliminary Mahoning County map developed showing proposed TMDL's. Map identifies regulated MS4 permit boundaries and overlays this information onto TMDL delineated watersheds. 	<ol style="list-style-type: none"> 1. Began to identify regulated areas which lie within TMDL watersheds. Table includes approved and pending approval TMDLs only. 	<ol style="list-style-type: none"> 1. BMP 3.5 addresses permit section 1.3.6. 2. OEPA Construction General Permit. 	<ol style="list-style-type: none"> 1. Complete TMDL layer for Mahoning County storm water Base Map. 2. Complete Mahoning County TMDL table. Table will include the following: <ul style="list-style-type: none"> ✓ TMDL HUC code and stream name. ✓ General Description of location. ✓ Summary of causes and sources. 3. Investigate and document County and Township potential sources as identified in TMDL. 4. Document all assumptions made during potential source assessments. 5. Draft outline of process to be developed in Year 5 of permit term which preliminary procedures to be implemented to address identified sources on a planning and project basis. 6. Determine how BMP will be evaluated and assessed. 7. Document assessment rationale for reporting. 	<ol style="list-style-type: none"> 1. Present map and table to storm water committee for review and comment. 2. Review updated Mahoning County Drainage Manual for potential edits based on completed mapping and tables.

MAHONING COUNTY YEAR 2 ANUUAL REPORT

Table 3: Construction Site Storm Water Control Plan Minimum Control Measure 4

ID	Best Management Practice	Permit Year 2004 Year 2 Objectives and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
4.1	<p>Adopt enhanced erosion and sediment control regulations. Townships to also adopt or enhance existing sediment & erosion control regulations (see individual Township SWMPs)</p>	<p>1. Mahoning County Engineers office and Mahoning County Soil and Water Conservation District completed development of <i>Mahoning County Drainage and Sediment Control Manual- Year 2 (2004)</i>. Manual includes:</p> <ul style="list-style-type: none"> ✓ Drainage Design and Engineering ✓ Storm Drainage Systems ✓ Post-Construction Storm Water Management Requirements ✓ Storm Water Pollution Prevention plans and Erosion and sediment Control Requirements ✓ Current Flood Plain Regulations. 	<p>1. Mahoning County has developed E&SC Regulations. The E&SC Regulations are included in the revised and updated <i>Mahoning County Drainage and sediment Control Manual</i>.</p> <p>2. Resolution from the Mahoning County Commissioners adopting the revised/updated Drainage Criteria and Erosion & Sediment Control Manual will be in place spring 2005.</p>	<p>1. BMP 4.1 Addresses permit sections:</p> <ul style="list-style-type: none"> ✓ 3.2.4.1.1 ✓ 3.2.4.1.2 ✓ 3.2.4.1.3 ✓ 3.2.4.1.4 ✓ 3.2.4.1.6 ✓ 3.2.4.2.1 ✓ 3.2.4.2.2 ✓ 3.2.4.2.3 <p>2. OEPA Construction General Permit (CGP).</p>	<p>1. Implement the new requirements contained within the revised/updated Drainage Criteria and Erosion & Sediment Control Manual.</p> <p>2. Investigate benefit of developing a “Contractor” field sheet which provides Erosion control BMP installation techniques, site inspection requirements and proper documentation.</p> <p>3. Draft enforcement language and develop violation fee structure. Enforcement language should contain one Notice of Violation (NOV) warning.</p> <p>4. Clarify if <i>Mahoning County Drainage and Sediment Control Manual</i> will serve as the regulation/ordinance mechanism.</p> <p>5. Determine compliance process/procedures (Site inspections)- given reduced role of SWCD activities with in County.</p> <p>6. Determine value of developing site plan review checklist which is coordinated with updated manual.</p> <p>7. Determine how BMP will be evaluated and assessed.</p> <p>8. Document assessment rationale for reporting.</p>	<p>1. Mahoning County will provide updates/revisions to the Manual periodically based on reviews of actual Manual concepts implemented in the field.</p> <p>2. Mahoning County will consider Manual user suggestions and feedback on improving Manual content and applicability.</p> <p>3. Conduct Manual workshops.</p>

MAHONING COUNTY YEAR 2 ANUUAL REPORT

Table 3: Construction Site Storm Water Control Plan Minimum Control Measure 4

ID	Best Management Practice	Permit Year 2004 Year 2 Objectives and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
4.2	Workshop on Erosion & Sediment Control Regulations	<ol style="list-style-type: none"> SWCD held multiple site-specific workshops and presentations related to Erosion and Sediment Control. Two half-day workshops will be to train users on the updated manual. 	<ol style="list-style-type: none"> On-site workshops were conducted as contractors and builders had questions relating to ESC practices arose during construction. Significant time and effort by SWCD went into the preparation of the soon to be adopted Mahoning County E&SC Regulations. 	<ol style="list-style-type: none"> See BMP 4.1 for permit sections. 	<ol style="list-style-type: none"> Workshops will be provided in Year 3 with emphasis on the soon-to-be-adopted Mahoning County E&SC Regulations. Develop and provide Erosion/Sediment Fact sheet for website. Develop workshop materials. Link workshop to updated manual. 	<ol style="list-style-type: none"> Publish workshop on web page. Complete workshop material development.
4.3	Enter into Memorandum of Understanding (MOU) with SWCD	<ol style="list-style-type: none"> MOU Review and update completed in Year 2. 	<ol style="list-style-type: none"> MOU developed and signed between SWCD and the Mahoning County Engineer's Office, outlining cooperative duties/services provided by each entity. 	<ol style="list-style-type: none"> BMP 4.3 addresses permit sections 3.2.4.2.2 and 3.2.4.3.4. 	<ol style="list-style-type: none"> Review MOU language and update as necessary throughout Year 3. Consider an alternative or backup based on SWCD availability in Years 3- 5 of the permit. 	<ol style="list-style-type: none"> Document MOU changes as necessary.
4.4	Review Erosion & Sediment Control plans/Storm Water Pollution Prevention Plans (SWPPP) Note: BMP name change.	<ol style="list-style-type: none"> Continued current plan review process. Current plan process: <ul style="list-style-type: none"> ✓ Townships review site plans. ✓ Engineer reviews site plans (Springfield Twp.). ✓ SWCD reviews SWPPP and Erosion and Sediment Control plans. 	<ol style="list-style-type: none"> SWCD reviews residential (sub-division) and other projects requiring submission of E/S plans. The updated manual did not change the plan review process. Continue to work with the Townships and Building Departments to provide support for site erosion/sediment reviews. 	<ol style="list-style-type: none"> BMP 4.4 addresses permit section 3.2.4.1.4. 	<ol style="list-style-type: none"> Mahoning County will work with Townships to adopt the <i>Mahoning County Drainage and Erosion and Sediment Control Manual</i> Regulations. Develop Method to track and document number reviewed. Develop and place review site plan review checklist on webpage as PDF. SWCD will update website with <i>Mahoning County Drainage and Erosion and Sediment Control Manual</i> Regulations (including checklists). Develop site prioritization procedures for inspections. Determine how BMP will be evaluated and assessed. Document assessment rationale for reporting. 	<ol style="list-style-type: none"> Track number of plans reviewed for SWPPP and E/S BMP and controls. Document date E/S checklist placed on web page. Document Township adoption of E&SC Regulations.

MAHONING COUNTY YEAR 2 ANUUAL REPORT

Table 3: Construction Site Storm Water Control Plan Minimum Control Measure 4

ID	Best Management Practice	Permit Year 2004 Year 2 Objectives and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
4.5	Inspect active sites- SWCD will continue inspect active construction sites.	<ol style="list-style-type: none"> 1. SWCD – continued with current construction site inspection program. 2. Began implementation Urban Site Program Database tracking system. 3. Activity Summary-140+ inspections occurred in Year 2. Four sites referred to Ohio EPA for enforcement action. 	<ol style="list-style-type: none"> 1. Active construction sites are inspected/evaluated against compliance conditions set forth in OEPA's Construction General Permit. 2. Inspections are tracked with Urban Site Program (ACCESS database). 	<ol style="list-style-type: none"> 1. BMP 4.5 addresses permit section 3.2.4.1.6 	<ol style="list-style-type: none"> 1. SWCD – continue with current construction site inspection program. 2. Develop a method to collect and present data from Urban site Program for reporting purposes. 3. Determine data presentation format. 4. Determine Inspection frequency/schedule. OEPA SWMP comment indicated minimum of once per month. 4. Determine how BMP will be evaluated and assessed. 5. Document assessment rationale for reporting. 	<ol style="list-style-type: none"> 1. Report out data from Urban Site Program. Number of sites. 2. Summary of recurring violations. 3. Modify E/S controls if necessary to reduce recurring inspection noted deficiencies.
4.6	Enforcement Actions	<ol style="list-style-type: none"> 1. Mahoning County Engineers office and Mahoning County Soil and Water Conservation District completed development of <i>Mahoning County Drainage Erosion and Sediment Control Manual- Year 2 (2004)</i>. 2. Reviewed other County-E/S enforcement requirements/regulations during development of the updated manual. 3. Notice of Violation form implemented to notify developers/contractors of major non-compliances. 	<ol style="list-style-type: none"> 1. Review and track enabling legislation for additional enforcement as passed by the State Legislature. 2. Mahoning County E&SC Regulations will be amended as legislation continues to change. 	<ol style="list-style-type: none"> 1. BMP addresses permit section 3.2.4.2.6 2. Commissioners will be urged to adopt a resolution allowing the use HB 411 to enable County to enforce regulations. 	<ol style="list-style-type: none"> 1. Implement new requirements contained in the updated Drainage and Sediment and Erosion Control Manual. 2. Determine a fee structure for NOV and re-inspection fee. Re-inspection fees after 3 consecutive NOVs will be implemented. 3. Determine method to track, record and document inspections and enforcement actions taken. 4. Determine how BMP will be evaluated and assessed. 5. Document assessment rationale for reporting. 	<ol style="list-style-type: none"> 1. Mahoning County will provide updates and revisions to the Manual periodically based on reviews of actual Manual concepts implemented in the field. 2. Mahoning County will consider Manual user suggestions and feedback on improving Manual content and applicability. 3. Conduct Manual workshops

MAHONING COUNTY YEAR 2 ANUUAL REPORT

Table 3: Construction Site Storm Water Control Plan Minimum Control Measure 4

ID	Best Management Practice	Permit Year 2004 Year 2 Objectives and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
4.7	Respond to public complaints regarding construction activities	<ol style="list-style-type: none"> 1. Began the process of establishing a contact number for public feedback/complaints. 2. Current system in place under Year 2 – Direct complaints to SWCD. 	<ol style="list-style-type: none"> 1. Current mechanism in place is to direct complaints through SWCD. 	<ol style="list-style-type: none"> 1. BMP 4.7 addresses permit section 3.2.4.2.5. 	<ol style="list-style-type: none"> 1. Develop and publish call in number for water quality, construction site pollution complaints. 2. Develop method to track and document complaints. 3. Tracking will allow for follow up and documentation of complaint resolution. 4. Determine how BMP will be evaluated and assessed. 5. Document assessment rationale for reporting. 	<ol style="list-style-type: none"> 1. Establish call in number. 2. Determine tracking and documenting procedures.
4.8	Develop Updated Erosion & Sediment Control Inspection Checklist	<ol style="list-style-type: none"> 1. Year 2 - Continued to use the existing checklist. 2. Began to develop method to estimate number of plans checklist was applied. 	<ol style="list-style-type: none"> 1. Current checklist was used in Year 2. 	<ol style="list-style-type: none"> 1. BMP 4.8 addresses permit section 3.2.4.2.4. 	<ol style="list-style-type: none"> 1. Review current checklist modify as necessary to align with update Drainage and Erosion and Sedimentation Control Manual. Checklist should account for water quality issues, storm water BMP's and BMP maintenance requirements. 2. Complete tracking methodology and determine where and how to record results. 3. Determine how BMP will be evaluated and assessed. 4. Document assessment rationale for reporting. 	<ol style="list-style-type: none"> 1. Report out number of sites checklist used on. 2. Place list on web page. 3. Include updated checklist in updated manual. 4. Coordinate tracking and data recording needs with other SWMP BMPs.
4.9	Concrete Truck Wash Out.	<ol style="list-style-type: none"> 1. Concrete Truck Wash Out procedures and locations were identified in the updated drainage and erosion and sediment control manual. 	<ol style="list-style-type: none"> 1. Checklist developed includes requirements for concrete truck wash-out. 2. CGP was used to develop procedures and text for this BMP. 3. Regulations have been adopted and will be included as addendums to the updated drainage regulations. 	<ol style="list-style-type: none"> 1. BMP 4.9 addressed permit section 3.2.4.1.3. 	<ol style="list-style-type: none"> 1. Develop standard drawing for BMP. 2. Determine method to track and document violations and corrective action. 3. Document violations and corrections at sites. 4. Determine how BMP will be evaluated and assessed. 5. Document assessment rationale for reporting. 	<ol style="list-style-type: none"> 1. Continue to apply checklist to review SWPPP and E/S plans. 2. Coordinate tracking and data recording needs with other SWMP BMPs.

MAHONING COUNTY YEAR 2 ANUUAL REPORT

Table 3: Construction Site Storm Water Control Plan Minimum Control Measure 4

ID	Best Management Practice	Permit Year 2004 Year 2 Objectives and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
4.10	Construction Site Ingress/Egress	1. Ingress/Egress BMP procedures were addressed in the updated drainage and erosion and sedimentation control manual.	1. Checklist developed includes requirements for site ingress/egress protection. 2. CGP was used to develop procedures and text for this BMP. 3. Regulations have been adopted and will be included as addendums to the updated drainage regulations.	1. BMP 4.10 addressed permit section 3.2.4.1.3.	1. Develop standard drawing for BMP. 2. Determine method to track and document violations and corrective action. 3. Document violations and corrections at sites. 4. Determine how BMP will be evaluated and assessed. 5. Document assessment rationale for reporting.	1. Continue to apply checklist to review SWPPP and E/S plans. 2. Coordinate tracking and data recording needs with other SWMP BMPs.

MAHONING COUNTY YEAR 2 ANNUAL REPORT

Table 4: Post-Construction Storm Water Minimum Control Measure 5

ID	Best Management Practice	Permit Year 2004 Year 2 Objectives and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
5.1	Storm Water Management Regulations Note: BMPs 5.1.1 through 5.1.6 are new BMP's to be included in the SWMP plan.					
5.1.1	Vegetated Swale/Filter Strip	1. Mahoning County Engineers office and Mahoning County Soil and Water Conservation District completed development of <i>Mahoning County Drainage and Sediment Control Manual- Year 2 (2004)</i> . 2. Section 4.4 in the updated Drainage manual addresses this BMP with supporting schematic drawings. 3. County Engineer held a public comment period for the Manual as required by ORC. Comments were incorporated into the manual prior to final edits and presentation to County commissioners.	1. BMP's will begin to be reviewed and assessed beginning in Year 3. 2. Evaluation of BMP will assist in establishing goals and determining effective BMPs for use in Mahoning County.	1. BMP 5.1.1 addresses permit sections: ✓ 3.2.5.2.4 ✓ 3.2.5.2.4.2 ✓ 3.2.5.2.4.3 2. OEPA Construction General Permit (CGP): ✓ Post-Construction Section – Part III.G.2.e 3. Mahoning County Drainage and Erosion and Sediment Control Manual, Section 4.4.	1. Determine method to track BMPs installed for maintenance purposes. 2. Develop BMP maintenance document. 3. Investigate value in developing a GIS layer to locate these on storm water base map. 4. Investigate and establish BMP measurable goals for reporting and evaluation. 5. Determine evaluation or assessment methods to determine appropriateness. 6. Document evaluation rationale for reporting.	1. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools/aids to assist with tracking/reporting. 2. Develop and identify BMP maintenance needs and responsible personnel. 3. Consider developing BMP maintenance manual. OEPA SWMP comment recommends minimum inspection frequency of 1x annually.
5.1.2	Extended Detention Basin (Dry)	1. Mahoning County Engineers office and Mahoning County Soil and Water Conservation District completed development of <i>Mahoning County Drainage and Sediment Control Manual- Year 2 (2004)</i> . 2. Section 4.4 in the updated Drainage manual addresses this BMP with supporting schematic drawings. 3. County Engineer held a public comment period for the Manual as required by ORC. Comments were incorporated into the manual prior to final edits and presentation to County commissioners.	1. BMP's will begin to be reviewed and assessed beginning in Year 3. 2. Evaluation of BMP will assist in establishing goals and determining effective BMPs for use in Mahoning County.	1. BMP 5.1.2 addresses permit sections: ✓ 3.2.5.2.4 ✓ 3.2.5.2.4.2 ✓ 3.2.5.2.4.3 2. OEPA Construction General Permit (CGP): ✓ Post-Construction Section – Part III.G.2.e 3. Mahoning County Drainage and Erosion and Sediment Control Manual, Section 4.4.	1. Determine method to track BMPs installed for maintenance purposes. 2. Develop BMP maintenance document. 3. Investigate value in developing a GIS layer to locate these on storm water base map. 4. Investigate and establish BMP measurable goals for reporting and evaluation. 5. Determine evaluation or assessment methods to determine appropriateness. 6. Document evaluation rationale for reporting.	1. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools/aids to assist with tracking/reporting. 2. Develop and identify BMP maintenance needs and responsible personnel. 3. Consider developing BMP maintenance manual. OEPA SWMP comment recommends minimum inspection frequency of 1x annually.

MAHONING COUNTY YEAR 2 ANNUAL REPORT

Table 4: Post-Construction Storm Water Minimum Control Measure 5

ID	Best Management Practice	Permit Year 2004 Year 2 Objectives and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
5.1.3	Retention Basin (Wet)	<ol style="list-style-type: none"> 1. Mahoning County Engineers office and Mahoning County Soil and Water Conservation District completed development of <i>Mahoning County Drainage and Sediment Control Manual- Year 2 (2004)</i>. 2. Section 4.4 in the updated Drainage manual addresses this BMP with supporting schematic drawings. 3. County Engineer held a public comment period for the Manual as required by ORC. Comments were incorporated into the manual prior to final edits and presentation to County commissioners. 	<ol style="list-style-type: none"> 1. BMP's will begin to be reviewed and assessed beginning in Year 3. 2. Evaluation of BMP will assist in establishing goals and determining effective BMPs for use in Mahoning County. 	<ol style="list-style-type: none"> 1. BMP 5.1.3 addresses permit sections: <ul style="list-style-type: none"> ✓ 3.2.5.2.4 ✓ 3.2.5.2.4.2 ✓ 3.2.5.2.4.3 2. OEPA Construction General Permit (CGP): <ul style="list-style-type: none"> ✓ Post-Construction Section – Part III.G.2.e 3. Mahoning County Drainage and Erosion and Sediment Control Manual, Section 4.4. 	<ol style="list-style-type: none"> 1. Determine method to track BMPs installed for maintenance purposes. 2. Develop BMP maintenance document. 3. Investigate developing a GIS layer to locate these on storm water base map. 4. Investigate and establish BMP measurable goals for reporting and evaluation. 5. Determine evaluation or assessment methods to determine appropriateness. 6. Document evaluation rationale for reporting. 	<ol style="list-style-type: none"> 1. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking/reporting. 2. Develop and identify BMP maintenance needs and responsible personnel. 3. Consider developing BMP maintenance manual. OEPA SWMP comment recommends minimum inspection frequency of 1x annually.
5.1.4	Constructed Wetlands	<ol style="list-style-type: none"> 1. Mahoning County Engineers office and Mahoning County Soil and Water Conservation District completed development of <i>Mahoning County Drainage and Sediment Control Manual- Year 2 (2004)</i>. 2. Section 4.4 in the updated Drainage manual addresses this BMP with supporting schematic drawings. 3. County Engineer held a public comment period for the Manual as required by ORC. Comments were incorporated into the manual prior to final edits and presentation to County commissioners. 	<ol style="list-style-type: none"> 1. BMP's will begin to be reviewed and assessed beginning in Year 3. 2. Evaluation of BMP will assist in establishing goals and determining effective BMPs for use in Mahoning County. 	<ol style="list-style-type: none"> 1. BMP 5.1.4 addresses permit sections: <ul style="list-style-type: none"> ✓ 3.2.5.2.4 ✓ 3.2.5.2.4.2 ✓ 3.2.5.2.4.3 2. OEPA Construction General Permit (CGP): <ul style="list-style-type: none"> ✓ Post-Construction Section – Part III.G.2.e 3. Mahoning County Drainage and Erosion and Sediment Control Manual, Section 4.4. 	<ol style="list-style-type: none"> 1. Determine method to track BMPs installed for maintenance purposes. 2. Develop BMP maintenance document. 3. Investigate value in developing a GIS layer to locate these on storm water base map. 4. Investigate and establish BMP measurable goals for reporting and evaluation. 5. Determine evaluation or assessment methods to determine appropriateness. 6. Document evaluation rationale for reporting. 	<ol style="list-style-type: none"> 1. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools/aids to assist with tracking/reporting. 2. Develop and identify BMP maintenance needs and responsible personnel. 3. Consider developing BMP maintenance manual. OEPA SWMP comment recommends minimum inspection frequency of 1x annually.

MAHONING COUNTY YEAR 2 ANNUAL REPORT

Table 4: Post-Construction Storm Water Minimum Control Measure 5

ID	Best Management Practice	Permit Year 2004 Year 2 Objectives and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
5.1.5	Bio-retention	<ol style="list-style-type: none"> 1. Mahoning County Engineers office and Mahoning County Soil and Water Conservation District completed development of <i>Mahoning County Drainage and Sediment Control Manual- Year 2 (2004)</i>. 2. Section 4.4 in the updated Drainage manual addresses this BMP with supporting schematic drawings. 3. County Engineer held a public comment period for the Manual as required by ORC. Comments were incorporated into the manual prior to final edits and presentation to County commissioners. 	<ol style="list-style-type: none"> 1. BMP's will begin to be reviewed and assessed beginning in Year 3. 2. Evaluation of BMP will assist in establishing goals and determining effective BMPs for use in Mahoning County. 	<ol style="list-style-type: none"> 1. BMP 5.1.5 addresses permit sections: <ul style="list-style-type: none"> ✓ 3.2.5.2.4 ✓ 3.2.5.2.4.2 ✓ 3.2.5.2.4.3 2. OEPA Construction General Permit (CGP): <ul style="list-style-type: none"> ✓ Post-Construction Section – Part III.G.2.e 3. Mahoning County Drainage and Erosion and Sediment Control Manual, Section 4.4. 	<ol style="list-style-type: none"> 1. Determine method to track BMPs installed for maintenance purposes. 2. Develop BMP maintenance document. 3. Investigate value in developing a GIS layer to locate these on storm water base map. 4. Investigate and establish BMP measurable goals for reporting and evaluation. 5. Determine evaluation or assessment methods to determine appropriateness. 6. Document evaluation rationale for reporting. 	<ol style="list-style-type: none"> 1. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools/aids to assist with tracking/reporting. 2. Develop and identify BMP maintenance needs and responsible personnel. 3. Consider developing BMP maintenance manual. OEPA SWMP comment recommends minimum inspection frequency of 1x annually.
5.1.6	Alternative Methods (Manufactured Systems)	<ol style="list-style-type: none"> 1. Mahoning County Engineers office and Mahoning County Soil and Water Conservation District completed development of <i>Mahoning County Drainage and Sediment Control Manual- Year 2 (2004)</i>. 2. Section 4.4 in the updated Drainage manual addresses this BMP with supporting schematic drawings. 3. County Engineer held a public comment period for the Manual as required by ORC. Comments were incorporated into the manual prior to final edits and presentation to County commissioners. 	<ol style="list-style-type: none"> 1. BMP's will begin to be reviewed and assessed beginning in Year 3. 2. Evaluation of BMP will assist in establishing goals and determining effective BMPs for use in Mahoning County. 	<ol style="list-style-type: none"> 1. BMP 5.1.6 addresses permit sections: <ul style="list-style-type: none"> ✓ 3.2.5.2.4 ✓ 3.2.5.2.4.2 ✓ 3.2.5.2.4.3 2. OEPA Construction General Permit (CGP): <ul style="list-style-type: none"> ✓ Post-Construction Section – Part III.G.2.e 3. Mahoning County Drainage and Erosion and Sediment Control Manual, Section 4.4. 	<ol style="list-style-type: none"> 1. Determine method to track BMPs installed for maintenance purposes. 2. Develop BMP maintenance document. 3. Investigate value in developing a GIS layer to locate these on storm water base map. 4. Investigate and establish BMP measurable goals for reporting and evaluation. 5. Determine evaluation or assessment methods to determine appropriateness. 6. Document evaluation rationale for reporting. 	<ol style="list-style-type: none"> 1. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools/aids to assist with tracking/reporting. 2. Develop and identify BMP maintenance needs and responsible personnel. 3. Consider developing BMP maintenance manual. OEPA SWMP comment recommends minimum inspection frequency of 1x annually.

MAHONING COUNTY YEAR 2 ANNUAL REPORT

Table 4: Post-Construction Storm Water Minimum Control Measure 5

ID	Best Management Practice	Permit Year 2004 Year 2 Objectives and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
5.2	Workshops for Post-Construction Regulations Note: BMP name change	1. SWCD held multiple site specific workshops and presentations related to Erosion and Sediment Control. 2. 2 – Half-day workshops will be scheduled in connection with how to use the updated manual. 3. Complete updates to Drainage and Sediment and Erosion Control Manual, which included Post-Construction BMP's. Note: Workshops for Year 2 were sediment/Erosion control focused.	1. On-site workshops were conducted as contractors and builders had questions relating to ESC practices arose during construction. 2. Significant time and effort by SWCD went into the preparation of the soon to be adopted Mahoning County E&SC Regulations. Note: Year 3- workshops will be modified to accommodate Post-Construction Controls.	1. BMP 5.2 addresses permit section 3.2.5.2.3.3.	1. Develop materials and schedule a minimum of 2 workshops focused on Mahoning County's Post-Construction BMP's. 2. Develop schedule to perform reviews and updates of workshop materials. 3. Determine how BMP will be evaluated and assessed. 4. Document assessment rationale for reporting. 5. Determine how to track workshop attendance and update workshop materials as necessary.	1. Investigate and identify location or sources that developers, contractors, engineers, builders and public can go to access information on Post-Construction storm water management BMP's.
5.3	Open space preservation (Non-Structural BMP)	1. Committee formed comprised of Township Zoning representatives, AWARE, Mill Creek Park and representatives from various County offices to prepare model zoning ordinances to encourage open space preservation. 2. Updated drainage manual minimally addresses this BMP in section 1.4.	1. Townships have authority to zone land use in accordance with a comprehensive plan and zoning resolution. Therefore, townships to the maximum extent practicable will consider open space preservation consistent with their community goals and zoning resolutions.	1. BMP 5.3 addresses permit section 3.2.5.2.3 and 3.2.5.2.3.1 2. Until the various Township zoning codes and the building code are amended, the County will continue to encourage development that will maintain or improve water quality.	1. Continue working with SWMP Zoning Committee to complete development of a model open space zoning resolution. 2. Consider a potential credit system which would benefit site plans which maximize or incorporate open space preservation within proposed development. 3. Develop and capture any maintenance associated with open space and identify responsible maintenance persons.	1. Revise existing zoning ordinances to include the model zoning ordinances. 2. Prior to completing zoning ordinance, review and recommend updates to Drainage manual to be alignment with ordinance.

MAHONING COUNTY YEAR 2 ANNUAL REPORT

Table 4: Post-Construction Storm Water Minimum Control Measure 5

ID	Best Management Practice	Permit Year 2004 Year 2 Objectives and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
5.4	Measures reducing impervious cover (Non-structural BMP)	<ol style="list-style-type: none"> 1. Committee formed comprised of Township Zoning representatives, AWARE, Mill Creek Park and representatives from various County offices to prepare model zoning ordinances to encourage open space preservation. 2. Updated drainage manual minimally addresses this BMP in section 1.4. 	<ol style="list-style-type: none"> 1. Townships have authority to zone land use in accordance with a comprehensive plan and zoning resolution. Therefore, townships to the maximum extent practicable will consider open space preservation consistent with their community goals and zoning resolutions 	<ol style="list-style-type: none"> 1. BMP 5.3 addresses permit section 3.2.5.2.3 ,3.2.5.2.3.1and 3.2.5.2.3.4 2. Until the various township zoning codes and the building code are amended, the County will continue to encourage development that will maintain or improve water quality. 	<ol style="list-style-type: none"> 1. Continue working with SWMP Zoning Committee to complete development of a model open space zoning resolution. 2. Consider a potential credit system which would benefit site plans which maximize or incorporate open space preservation within proposed development. 3. Develop and capture any maintenance associated with open space and identify responsible maintenance persons 	<ol style="list-style-type: none"> 1. Revise existing zoning ordinances to include the model zoning ordinances. 2. Prior to completing zoning ordinance, review and recommend updates to Drainage manual to be alignment with ordinance.
5.5	Conservation residential subdivisions (Non-structural BMP)	<ol style="list-style-type: none"> 1. Committee formed comprised of Township Zoning representatives, AWARE, Mill Creek Park and representatives from various County offices to prepare model zoning ordinances to encourage open space preservation. 2. Updated drainage manual minimally addresses this BMP in section 1.4. 	<ol style="list-style-type: none"> 1. Townships have authority to zone land use in accordance with a comprehensive plan and zoning resolution. Therefore, townships to the maximum extent practicable will consider open space preservation consistent with their community goals and zoning resolutions 	<ol style="list-style-type: none"> 1. BMP 5.3 addresses permit section 3.2.5.2.3 and 3.2.5.2.3.1 2. Until the various township zoning codes and the building code are amended, the County will continue to encourage development that will maintain or improve water quality. 	<ol style="list-style-type: none"> 1. Continue working with SWMP Zoning Committee to complete development of a model open space zoning resolution. 2. Consider a potential credit system which would benefit site plans which maximize or incorporate open space preservation within proposed development. 3. Develop and capture any maintenance associated with open space and identify responsible maintenance persons 	<ol style="list-style-type: none"> 1. Revise existing zoning ordinances to include the model zoning ordinances. 2. Prior to completing zoning ordinance, review and recommend updates to Drainage manual to be alignment with ordinance.

MAHONING COUNTY YEAR 2 ANNUAL REPORT

Table 4: Post-Construction Storm Water Minimum Control Measure 5

ID	Best Management Practice	Permit Year 2004 Year 2 Objectives and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
5.6	Riparian and Wetland Setbacks (Non-Structural BMP)	<ol style="list-style-type: none"> 1. Committee formed comprised of Township Zoning representatives, AWARE, Mill Creek Park and representatives from various County offices to prepare model zoning ordinances to encourage open space preservation. 2. Updated drainage manual minimally addresses this BMP in section 1.4. 	<ol style="list-style-type: none"> 1. Townships have authority to zone land use in accordance with a comprehensive plan and zoning resolution. Therefore, townships to the maximum extent practicable will consider open space preservation consistent with their community goals and zoning resolutions 	<ol style="list-style-type: none"> 1. BMP 5.3 addresses permit section 3.2.5.2.3 and 3.2.5.2.3.1 2. Until the various township zoning codes and the building code are amended, the County will continue to encourage development that will maintain or improve water quality. 	<ol style="list-style-type: none"> 1. Continue working with SWMP Zoning Committee to complete development of a model open space zoning resolution. 2. Consider a potential credit system which would benefit site plans which maximize or incorporate open space preservation within proposed development. 3. Develop and capture any maintenance associated with open space and identify responsible maintenance persons 	<ol style="list-style-type: none"> 1. Revise existing zoning ordinances to include the model zoning ordinances. 2. Prior to completing zoning ordinance, review and recommend updates to Drainage manual to be alignment with ordinance

MAHONING COUNTY YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 6

ID	Best Management Practice	Permit Year 2004 Year 2 Objectives and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
6.1	Controls for reducing or eliminating pollutant discharges from facilities	<ol style="list-style-type: none"> 1. Due to the Federal Disaster declarations, as a result of severe flooding, resources and personnel were re-directed to provide assistance and support. 2. Assessment of County/public facilities will begin in Year 3. 3. Tracking and information collection and retaining methods will begin in Year 3. 	<ol style="list-style-type: none"> 1. Assessments scheduled to be complete in Year 2 were rescheduled for Year 3 because of significant flooding events in 2004 within the county. 2. Modified schedule will be developed in Year 3. 	<ol style="list-style-type: none"> 1. BMP 6.1 addresses permit sections: <ul style="list-style-type: none"> ✓ 3.2.6.2.1 ✓ 3.2.6.2.3.1 ✓ 3.2.6.2.3.2 ✓ 3.2.6.2.3.3 ✓ 3.2.6.2.3.4 ✓ 3.2.6.2.4 ✓ 3.2.6.2.5 	<ol style="list-style-type: none"> 1. Develop revised schedule for facility reviews. 2. Schedule and complete facility investigations and reviews. 3. Document findings and develop schedule to implement corrections. 4. Develop system to track and store collected information for reporting purposes. 5. Perform post-correction inspections. 6. Determine evaluation or assessment methods to determine BMP appropriateness or effectiveness. 7. Develop prioritization system to rank identified corrections. 8. Develop list of Industrial facilities owned or operated by Mahoning County that require an OEPA Industrial storm water general permit. 	<ol style="list-style-type: none"> 1. Present summary of findings to storm water committee. 2. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools/aids to assist with tracking/reporting. 3. Consider developing BMP maintenance manual. OEPA SWMP comment recommends minimum inspection frequency of 1x annually.

MAHONING COUNTY YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 6

ID	Best Management Practice	Permit Year 2004 Year 2 Objectives and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
6.2	County staff education program on pollution prevention- Operations and Maintenance Training.	<ol style="list-style-type: none"> 1. Due to the Federal Disaster declarations, as a result of severe flooding, resources and personnel were re-directed to provide assistance and support. 2. Tracking and information collection and retaining methods will begin in Year 3. 	<ol style="list-style-type: none"> 1. Assessments scheduled to be complete in Year 2 were rescheduled for Year 3 because of significant flooding events in 2004 within the county. 2. Modified schedule will be developed in Year 3. 	<ol style="list-style-type: none"> 1. BMP 6.2 addresses permit section 3.2.6.1.1 and 3.2.6.1.2. 	<ol style="list-style-type: none"> 1. Complete Operations and Maintenance (O/M) procedures review. 2. Identify areas/practices/procedures that could be updated and incorporate water quality elements. 3. Develop training schedule and materials based on review of O/M review and focus training on target audience. 4. Determine evaluation or assessment methods to determine BMP appropriateness or effectiveness. 5. Determine methods to track and organize training attendees, when training materials need to be updated and reporting needs. 	<ol style="list-style-type: none"> 1. Present training needs to storm water committee. 2. Outline training materials need and develop schedule to develop, secure and build training program. OEAP SWMP comment- Recommends 1x Year to hold training. 3. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools/aids to assist with tracking/reporting.

MAHONING COUNTY YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 6

ID	Best Management Practice	Permit Year 2004 Year 2 Objectives and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
6.3	Street Sweeping and Catch Basin Cleaning	<ol style="list-style-type: none"> 1. Due to the Federal Disaster declarations, as a result of severe flooding, resources and personnel were re-directed to provide assistance and support. 2. Tracking and information collection and retaining methods will begin in Year 3. 	<ol style="list-style-type: none"> 1. Mahoning County O/M staff performed street sweeping on all curbed streets a minimum of 1x in Year 2. No quantitative information was collected. 2. Catch basins inspected and cleaned out as needed in Year 2. No quantitative information was collected. 	<ol style="list-style-type: none"> 1. BMP 6.3 addresses permit sections: <ul style="list-style-type: none"> ✓ 3.2.6.2.1 ✓ 3.2.6.2.3.1 ✓ 3.2.6.2.3.2 ✓ 3.2.6.2.3.3 ✓ 3.2.6.2.3.4 ✓ 3.2.6.2.4 ✓ 3.2.6.2.5 	<ol style="list-style-type: none"> 1. Develop forms to record street sweepings collected and number of catch basins cleaned out and volume of material collected from CB's. 2. Document quantity of street sweepings disposed of annually. 3. Document number of catch basins inspected and cleaned out annually. 4. Draft street sweeping, Catch Basin clean out and storm sewer maintenance protocols. Tie protocols to training being developed in 6.2 5. Determine evaluation or assessment methods to determine BMP appropriateness or effectiveness. 6. Develop system to track and store collected information for reporting purposes. 	<ol style="list-style-type: none"> 1. Perform and record street sweeping activities- number of miles, amount collected. 2. Perform catch basin clean out- record number cleaned, estimated volume of material collected. 3. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools/aids to assist with tracking/reporting.

MAHONING COUNTY YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 6

ID	Best Management Practice	Permit Year 2004 Year 2 Objectives and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
6.4	Salt Storage and Applications	<ol style="list-style-type: none"> Due to the Federal Disaster declarations, as a result of severe flooding, resources and personnel were re-directed to provide assistance and support. Tracking and information collection and retaining methods will begin in Year 3. 	<ol style="list-style-type: none"> Mahoning County Engineers used 8000 tons of salt during Year 1 (April to February). All spills are picked up and reincorporated into salt supplies. Minor salt spills that occur during field applications are dispersed by traffic. De-icing materials are stored under cover (salt domes and salt sheds) in a manner that minimizes commingling with surface runoff. 	<ol style="list-style-type: none"> BMP 6.4 addresses permit sections: <ul style="list-style-type: none"> ✓ 3.2.6.2.1 ✓ 3.2.6.2.3.1 ✓ 3.2.6.2.3.2 ✓ 3.2.6.2.3.3 ✓ 3.2.6.2.3.4 ✓ 3.2.6.2.4 ✓ 3.2.6.2.5 	<ol style="list-style-type: none"> Conduct drainage survey of all storage facilities (Salt storage, material storage, by-product storage, spoil storage, liquid storage and secondary containment storage, etc.). Document findings and determine method to prioritize locations in need of modifications or upgrades. Draft procedures for post event clean up. Record number of events and estimated amounts cleaned up post event. Determine how to collect drainage modifications to public facilities for reporting purposes. Determine how to evaluate/assess modifications and post event clean up activities or procedures. Develop system to track and store collected information for reporting purposes. 	<ol style="list-style-type: none"> Record total de-icing material used annually. Complete clean up procedural document. Complete storage facility drainage/outfall inventory. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools/aids to assist with tracking/reporting.
6.5	Storm Water System Maintenance	<ol style="list-style-type: none"> Due to the Federal Disaster declarations, as a result of severe flooding, resources and personnel were re-directed to provide assistance and support. Tracking and information collection and retaining methods will begin in Year 3. 	<ol style="list-style-type: none"> Large amount of ditch maintenance was performed during Year 2 due to significant drainage problems as a result of severe flooding. Protocol for keeping records of quantities of linear feet of ditch cleaned/maintained still needs to be developed. Ditches are maintained to control storm water. When cleaned, back slopes are cut where necessary to make maintenance easier and to prevent erosion. 	<ol style="list-style-type: none"> BMP 6.5 addresses permit sections: <ul style="list-style-type: none"> ✓ 3.2.6.2.1 ✓ 3.2.6.2.3.1 ✓ 3.2.6.2.3.2 ✓ 3.2.6.2.3.3 ✓ 3.2.6.2.3.4 ✓ 3.2.6.2.4 ✓ 3.2.6.2.5 	<ol style="list-style-type: none"> Develop forms to record linear feet of ditch maintained annually. Document linear footage maintained. Develop method to track linear footage of ditches maintained annually. Draft Ditch maintenance procedures and disposal requirements. Determine how to evaluate/assess activities or procedures associated with sewer system cleaning. 	<ol style="list-style-type: none"> Record linear feet of ditch cleaned/maintained annually. Present draft procedures to storm water committee for comment. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools/aids to assist with tracking/reporting.

MAHONING COUNTY YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 6

ID	Best Management Practice	Permit Year 2004 Year 2 Objectives and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
6.6	Fleet Maintenance	<ol style="list-style-type: none"> 1. Due to the Federal Disaster declarations, as a result of severe flooding, resources and personnel were re-directed to provide assistance and support. 2. Tracking and information collection and retaining methods will begin in Year 3. 	<ol style="list-style-type: none"> 1. 2250 gallons of used oil was recycled from 1/1/04 to 12/31/04. 2. 850 used oil filters were recycled from 1/1/04 to 12/31/04. 3. Chemicals with MSDS were stored in maintenance garages. Disposal of these materials is provided by a contractor who is required to disposal of material in accordance with local, state, and federal laws. 4. Oil is drained from equipment into drain pans and transferred to an above-ground tank for recycling by Safety-Kleen System, Inc. 5. Antifreeze is also recycled. 	<ol style="list-style-type: none"> 1. BMP 6.5 addresses permit sections: <ul style="list-style-type: none"> ✓ 3.2.6.2.1 ✓ 3.2.6.2.3.1 ✓ 3.2.6.2.3.2 ✓ 3.2.6.2.3.3 ✓ 3.2.6.2.3.4 ✓ 3.2.6.2.4 ✓ 3.2.6.2.5 	<ol style="list-style-type: none"> 1. Continue tracking vehicle fluids collected. 2. Review and identify additional fleet vehicle recyclables. 3. Identify and document current drainage systems for all vehicle maintenance locations. 4. Develop method to prioritize locations in need of modifications or upgrades. 5. Determine how to track fluid volumes, recyclable materials and any drainage modifications for reporting purposes. 6. Determine how to evaluate/assess activities or procedures associated with fleet vehicle maintenance operations/collection of recyclable materials and drainage associated with fleet maintenance locations. 	<ol style="list-style-type: none"> 1. Present summary of collected materials to storm water committee. 2. Identify additional vehicle materials to be collected, recycled and reported for annual report. 3. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools/aids to assist with tracking/reporting

MAHONING COUNTY YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 6

ID	Best Management Practice	Permit Year 2004 Year 2 Objectives and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
6.7	Vehicle Washing	<ol style="list-style-type: none"> Due to the Federal Disaster declarations, as a result of severe flooding, resources and personnel were re-directed to provide assistance and support. Tracking and information collection and retaining methods will begin in Year 3. 	<ol style="list-style-type: none"> Determination of drainage/runoff associated with vehicle washing activity will be completed in Year 3. Current vehicle washing is performed both inside and outside at maintenance facilities. 	<ol style="list-style-type: none"> BMP 6.6 addresses permit sections: <ul style="list-style-type: none"> ✓ 3.2.6.2.1 ✓ 3.2.6.2.3.1 ✓ 3.2.6.2.3.2 ✓ 3.2.6.2.3.3 ✓ 3.2.6.2.3.4 ✓ 3.2.6.2.4 ✓ 3.2.6.2.5 	<ol style="list-style-type: none"> Complete current vehicle washing review. Note location of washing, surface drainage issues, outfalls. Draft procedures for vehicle washing. Determine areas which need modification or updates. Determine method to prioritize modifications/updates. Investigate recycled uses for wash water. Determine how to track and document wash areas, water recycled or collected to be hauled off. Investigate oil/water separator maintenance frequency and spoil disposal. Draft oil/water maintenance procedures. Determine how to evaluate/assess activities or procedures associated with vehicle wash operations and drainage. 	<ol style="list-style-type: none"> Present draft procedures to storm water committee for review and discussion. Review Maintenance Operations document. Adopt procedures and incorporate into maintenance operations document. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools/aids to assist with tracking/reporting.
6.8	Household Hazardous Waste Drop off	<ol style="list-style-type: none"> 212,969 pounds of household hazardous waste were collected by the Green Team during the collection event. Two Household Hazardous Waste Collection Events were held County wide during Year 2. 	<ol style="list-style-type: none"> Year 2- First year of reportable amounts documented. Year 3 – Green Team will continue program. 	<ol style="list-style-type: none"> BMP 6.8 addresses permit sections 3.2.6.2.4 and 3.2.6.2.5. 	<ol style="list-style-type: none"> Green Team to continue Household Hazardous Waste Collection activity Develop form to report collected amounts on for tracking purposes. Determine how to track and document amounts collected. Determine how to evaluate/assess collected amounts related to increased water quality benefit. 	<ol style="list-style-type: none"> Present results to storm water committee. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools/aids to assist with tracking/reporting.

AUSTINTOWN TOWNSHIP YEAR 2 ANNUAL REPORT
Table 1: Public Involvement/Participation Minimum Control Measure 1 & 2

ID	Best Management Practice	Permit Year 2004 Year 2 Objectives and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
1.1	Township Storm Water Management Committee	1. Attended 4 County Storm Water Committee meetings 2. Key Township committee activities: <ul style="list-style-type: none"> • Township Storm Water committee began development schedule for BMP implementation. 	1. Need to complete implementation schedule for SWMP- BMPs. 2. Need to develop contact plan for the following: <ul style="list-style-type: none"> ✓ Service Stations ✓ Commercial Properties ✓ Home Owners Association ✓ School properties 3. Severe flooding, in May and September 2004, federal disaster assistance was approved for citizens and local governments for Mahoning County. As a result of these events BMP and plan activity implementation was limited.	1. BMP 1.1 addresses permit sections 3.2.1.2.3 and 3.2.2.2.3.	1. Township storm water management committee members will continue to attend County Storm water committee meetings. 2. Township storm water management committee will perform the following activities in Year 3: <ul style="list-style-type: none"> ✓ Develop township BMP implementation schedule. ✓ Develop BMP table and determine responsible personnel for implementation, documentation and maintenance activities associated with BMP's. 3. Develop Contact plan for: <ul style="list-style-type: none"> ✓ Service Stations ✓ Commercial Properties ✓ Home Owners Association ✓ School properties 4. Determine how Township storm water BMP implementation, maintenance and support activities will tracked, collected and reported. 5. Determine how BMP will be evaluated and assessed.	1. Present completed BMP implementation schedule and contact plan to County Storm Water Committee. 2. Present BMP Implementation plan to Township Trustees.

AUSTINTOWN TOWNSHIP YEAR 2 ANNUAL REPORT
Table 1: Public Involvement/Participation Minimum Control Measure 1 & 2

ID	Best Management Practice	Permit Year 2004 Year 2 Objectives and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
1.2	Newsletters	<ol style="list-style-type: none"> 1. <i>Mahoning Matters</i>: Quarterly publication of Mahoning SWCD – distributed to 104,686 county residents. 2. <i>Pipeline</i> – published twice a year by County Sanitary Engineer – distributed to 44,000 households 3. Articles on implementation of storm water program elements and specific storm water issues have been prepared to keep public informed about the program and increase awareness on specific issues and ways the public can assist in reducing pollution. 	<ol style="list-style-type: none"> 1. <i>Mahoning Matters</i> – Title of Article printed in 2004. 2. <i>Pipeline</i>- Title of article printed in 2004. 3. Education Newsletter was distributed 2 times during Year 2 to 2,300 teachers and 300 were placed in the public library. 	<ol style="list-style-type: none"> 1. BMP 1.3 addresses permit section 3.2.1.2.5. <p>Due to budget constraints within the county, the SWCD staff hours were reduced. The Education Specialist resigned; consequently, educational programs have been cut dramatically.</p>	<ol style="list-style-type: none"> 1. Assist in drafting information for <i>Mahoning Matters</i> article. 2. One update in the <i>Pipeline</i> per year will continue to be an objective in Year 3. 3. Document number of newsletters published. 	<ol style="list-style-type: none"> 1. Collect copies of both articles.
1.3	Public Meetings	<ol style="list-style-type: none"> 1. Township Trustee Meetings held twice monthly. 2. Continued working on township version of SWMP. 3. Township Trustee Meetings- Continued to address storm water issues- Year 2. 	<ol style="list-style-type: none"> 1. TSWMC will complete the township version of the SWMP will be complete in Year 3. 	<ol style="list-style-type: none"> 1. BMP 1.3 addresses permit section 3.2.1.2.4, 3.2.1.2.6 and 3.2.2.2.2. 	<ol style="list-style-type: none"> 1. Complete township trustee SWMP presentation. 2. Continue to encourage public involvement related to storm water issues during Township Trustee meetings. 3. Develop a Public involvement plan for citizens to become involved the Townships storm water program. 4. Consider including a citizen on Township storm water management committee (TSWMC). 5. Determine pollutants TSWMC will target. 6. Determine how information for this BMP will be collected, tracked, documented and reported. 7. Determine how BMP will be evaluated and assessed. 	<ol style="list-style-type: none"> 1. Continue to seek public input on the implementation of the SMWP. 2. Present identified target pollutants to Township trustees and coordinate with County storm water committee to align goals and objectives.

AUSTINTOWN TOWNSHIP YEAR 2 ANNUAL REPORT
Table 1: Public Involvement/Participation Minimum Control Measure 1 & 2

ID	Best Management Practice	Permit Year 2004 Year 2 Objectives and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
1.4	Community Activities	1. <u>Green Team</u> a. Classroom and youth group presentations completed. Estimated number attended = 395 classroom presentations, estimated 9786 students. b. Teacher curriculum workshops completed. Estimated number of workshops = 6 An estimated 152 attendees. c. Waste assessment activities for small businesses completed. Estimated number of Business Assessed = 12 assessments conducted. d. Tours/Field Trips conducted. Type and number attended : Field Trip type – 11 held Attendance - e. Cooperative recycling Waste education programs to reduce litter. Summary of collection effort = 17,237 lbs. f. Special Collection Days: Collections: HHW =212,969 lbs. E-Collection =133,483 lbs. Appliance =265,680 lbs. Christmas Tree =93,725 lbs Christmas Wrap & Card =3,155 lbs Household Battery = 1200.	1. <u>Green Team</u> a. Classroom presentations completed Year 2. b. Teacher curriculum completed Year 2. c. Waste Assessment criteria established and implemented Year 2. d. Tour/Field trips conducted in Year 2. e. Recycling program documented and performed in Year 2. f. Special collection days scheduled and held Year 2.	1. <u>Green Team</u> BMP 1.4 address permit sections 3.2.1.2.3, 3.2.1.2.5 and 3.2.2.2.4.	1. Develop efficient means for tracking and reporting recycled material collected. 2. Outline/Develop needs for annual community clean-up day. 3. <u>Green Team</u> a. Continue classroom and youth group presentations and document attendance. b. Continue teacher curriculum workshops. c. Continue waste assessment activities for small businesses. Begin documentation of program goals, waste reduction documented and summary of programs. d. Continue scheduling Tours/Field Trips. e. Continue cooperative recycling and education programs to reduce litter. Record collected amounts. f. Continue Special Collection Days 4. Determine how BMP will be evaluated and assessed. 5. Document assessment rationale for reporting in.	1. Begin to track amounts, report totals, assess and modify selected BMPs as necessary. 2. Set date and complete necessary procedural requirements for community clean up day. 3. <u>Green Team</u> a. Estimated 350 classroom and youth group presentations. b. Estimated 4 teacher curriculum workshops c. Estimated 10 targeted waste assessment activities for small business. d. Estimated 5 targeted tours/ field trips e. Estimated 1 cash for cans, 2 school paper programs, 20 adopt - a - spot. f. Estimated 1 Household Hazardous Waste collection, 1 E collection, 1 Appliance collection, 1 Christmas tree collection, 1 Christmas wrap and card collection.

AUSTINTOWN TOWNSHIP YEAR 2 ANNUAL REPORT
Table 1: Public Involvement/Participation Minimum Control Measure 1 & 2

ID	Best Management Practice	Permit Year 2004 Year 2 Objectives and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
1.5	Brochures, Flyers, Factsheets, and Handouts	1. Information and materials made available @ Township hall during Year 2: <ul style="list-style-type: none"> • Building/Zoning Permits – Water quality handouts. • <i>Mahoning Matters</i> • Mahoning SWCD- Car Washing tips. • Mahoning SWCD – Water Conservation, <i>Why should you Care?</i> • OEPA- <u>Protecting Ohio's Water</u>. • OSU Extension- Storm Water Fact Sheets. • MS4- Regulated area map 	1. Collected and organized information for public was made available at Town Hall facility. 2. Township Storm Water Committee continued working w/ Mahoning County Storm water committee to develop/collect information for County and Township use.	1. BMP 1.5 address permit sections 3.2.1.2.3, 3.2.1.2.5 and 3.2.2.2.4.	1. Continue working w/ County Storm water committee to develop and contribute information to the following: <ul style="list-style-type: none"> • <i>Mahoning Matters</i> • District Board of Health- Mailer regarding HSTS information. • Mahoning County Green Team • Mahoning County SWCD. 2. Investigate developing Township focused storm water brochure/factsheet. 3. Determine how BMP will be evaluated and assessed. 4. Document assessment rationale for reporting.	1. Continue to review and assess storm water program information received and update and make available to public at zoning office and town hall. 2. Determine tracking and documenting procedures. 3. Coordinate tracking and data recording needs with other SWMP BMPs.

AUSTINTOWN TOWNSHIP YEAR 2 ANNUAL REPORT

Table 2: Illicit Discharge Detection and Elimination Plan Minimum Control Measure 3

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
3.1	Map storm sewer system	<ol style="list-style-type: none"> 1. Severe flooding, in May and September 2004, federal disaster assistance was approved for citizens and local governments for Mahoning County. Year 2 – System Mapping was rescheduled for Year 3. Mahoning County is considering several protocols for inventory along with the attributes collected. 2. Township will initiate storm sewer mapping activities in Year 3. 3. Township to coordinate storm sewer inventory with County inventory to standardized system attribute collection. 	<ol style="list-style-type: none"> 1. Severe flooding, in May and September 2004, federal disaster assistance was approved for citizens and local governments for Mahoning County. Year 2 – System Mapping was rescheduled for Year 3. 	<ol style="list-style-type: none"> 1. BMP will address permit section 3.2.3.1.2 and 3.2.3.2.1 2. BMP Assessment here will be based on percent complete per year between Year 3 and Year 4. 	<ol style="list-style-type: none"> 1. Outline System inventory approach/sequence and schedule for system outfalls and Home Sewer Treatment System (HSTS) outfalls. Coordinate HSTS inventory with District Board of Health and Mahoning County Engineers office. 2. Develop inventory protocols. 3. Determine how and where outfall inventory will be stored or filed. 4. Determine how inventory data will be linked w/ County- GIS mapping to create “Storm Sewer Base Map”. 5. Determine system attributes to be collected. 6. Consider including “Simple” dry weather screening activities (Color, odor, presence of flow) which can be easily performed during inventory as a method to begin identification of potential illicit discharge locations. 	<ol style="list-style-type: none"> 1. Begin inventory. 2. Complete base map for use in inventory. 3. Document process (Protocol). 4. Draft revised completion schedule. 5. Address the Dry weather screening issue.

AUSTINTOWN TOWNSHIP YEAR 2 ANNUAL REPORT
Table 2: Illicit Discharge Detection and Elimination Plan Minimum Control Measure 3

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
3.2	Develop program to detect and eliminate illicit discharges	1. Severe flooding, in May and September 2004, federal disaster assistance was approved for citizens and local governments for Mahoning County. Year 2 – System Mapping was rescheduled for Year 3. The Township will initiate storm sewer system mapping and inventory preparation activities in Year 3- scheduled completion date in permit Year 5.	1. Severe flooding, in May and September 2004, federal disaster assistance was approved for citizens and local governments for Mahoning County. Year 2 – System Mapping was rescheduled for Year 3. The Township will initiate storm sewer system mapping and inventory preparation activities in Year 3- scheduled completion date in permit Year 5.	1. BMP 3.2 addresses permit sections: <ul style="list-style-type: none"> ✓ 3.2.3.1.3 ✓ 3.2.3.1.4 ✓ 3.2.3.1.5 ✓ 3.2.3.2.2 ✓ 3.2.3.2.3 ✓ 3.2.3.2.4 ✓ 3.2.3.2.4.1 ✓ 3.2.3.2.4.2 ✓ 3.2.3.2.4.3 ✓ 3.2.3.2.4.4 2. Wastewater discharges that are identified during any inspection are required to be corrected to comply with Section 2 part C,D,E,F, & G of the Regulation of Household Sewage Disposal Systems. 3. Off-lot discharges are permitted for wastewater when an on-lot system can not be installed and the off-lot system is installed to comply with the Regulations of Household Sewage Disposal Systems Section 2 part G.	1. Begin development of Illicit Discharge Ordinance. Outline suggested enforcement procedures. (3.2.3.1.3 and 3.2.3.2.3). Develop draft schedule for implementation. 2. Develop preliminary Illicit Discharge Elimination Plan (IDEP). Plan should include procedures for detection and process for removal and reporting. IDEP should include schedule and implementation steps. (3.2.3.1.4, 3.2.3.2.2, 3.2.3.2.4) 3. Develop IDEP program factsheet for public and employee use. (3.2.3.1.5) 4. Develop preliminary Dry Weather Screening Plan. (3.2.3.2.4.1 and 3.2.3.2.4.2). 5. Process for prioritizing “Hot Spot” areas. 6. Develop general procedures for removing identified illicit discharges. 7. Develop BMP evaluation/assessment criteria or procedures. Document status for annual report in Year 3. 7. Determine storage/file location of collected IDEP information/elimination data/follow up action- required or taken. 8. Determine how BMP will be evaluated and assessed. 9. Document assessment rationale for reporting.	1. Work with County engineer and Township Trustees to complete and obtain approval of Illicit Discharge Ordinance/regulation. 2. Work with County Sanitary Engineer, District Board of Health, Townships and Mill Creek Metroparks to draft both Illicit Discharge Ordinance language and to outline the IDEP program for the County. 3. Determine the following: <ul style="list-style-type: none"> ✓ Champion for IDEP program. ✓ Where IDEP will be filed and how will data be linked w/ County GIS. ✓ Determine whether the Dry Weather Screening will be performed during inventories. ✓ Complete schedule ✓ OEPA recommended 100 % dry weather screening be completed between Year 3 and Year 5. ✓ Draft NOV form. ✓ Evaluation process.

AUSTINTOWN TOWNSHIP YEAR 2 ANNUAL REPORT
Table 2: Illicit Discharge Detection and Elimination Plan Minimum Control Measure 3

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
3.3	Adopt resolutions prohibiting illicit discharges	1. Began Ohio Revised Code (ORC) and Township authority research related to County authority to implement regulations related to illicit discharge.	1. Based on research results. Regulation/ordinance should include or address the following: <ul style="list-style-type: none"> ✓ Prohibition of Illicit discharges and illegal dumping. ✓ Enforcement ✓ Private property access for investigative purposes to determine illicit source ✓ First offense warning-NOV. 	1. See BMP 3.2 for permit sections.	1. Complete review/research. See BMP 3.2 for sequence details. 2. Draft summary of findings document. 3. Prepare draft Illicit Discharge regulation including: <ul style="list-style-type: none"> ✓ Prohibition of Illicit discharges and illegal dumping. ✓ Enforcement ✓ Private property access for investigative purposes to determine illicit source. ✓ First offense warning-NOV. 4. Determine how BMP will be evaluated and assessed. 5. Document assessment rationale for reporting.	1. Present Draft Illicit Discharge regulation to Township Storm water committee for review and comment. 2. Revise regulation based on comments. 3. Schedule meeting w/ Township Trustees to present draft regulation. 4. Follow through regulation adoption process to achieve passage of draft regulation(s).

AUSTINTOWN TOWNSHIP YEAR 2 ANNUAL REPORT
Table 2: Illicit Discharge Detection and Elimination Plan Minimum Control Measure 3

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
3.4	<p>Total Maximum Daily Load (TMDL) (Ohio EPA Permit Section 1.3.6) County and Township procedures should be able to demonstrate how they determined the amount of pollutant needed to be reduced within the impaired stream segment(s), and how much pollutant was reduced (i.e., water sampling to verify the amounts removed).</p>	<ol style="list-style-type: none"> 1. Table completed identifying Approved and pending TMDLs within Ohio. 2. Preliminary Mahoning County map developed showing proposed TMDL's. Map identifies regulated MS4 permit boundaries and overlays this information onto TMDL delineated watersheds. 	<ol style="list-style-type: none"> 1. County's consultant currently has a system in place to identify the TMDL watersheds located throughout the county. 2. Began development of regulated areas which overlay on top of TMDL watershed. Table includes approved and pending approval TMDLs only. 	<ol style="list-style-type: none"> 1. BMP 3.5 addresses permit section 1.3.6. 2. OEPA Construction General Permit. 	<ol style="list-style-type: none"> 1. Provide information/assistance for Mahoning County to complete TMDL layer development for the storm water Base Map. 2. Provide assistance to assist Mahoning County with completing TMDL table. Table will include the following: <ul style="list-style-type: none"> ✓ TMDL HUC code and stream name. ✓ General Description of location. ✓ Summary of causes and sources. 3. Investigate and document Township potential sources as identified in TMDL. 4. Document all assumptions made during potential source assessments. 5. Assist through Township Storm Water Management Committee with drafting outline of process to be developed in Year 5 of permit term which preliminary procedures to be implemented to address identified sources on a planning and project basis. 6. Determine how BMP will be evaluated and assessed. 7. Document assessment rationale for reporting. 	<ol style="list-style-type: none"> 1. Present map and table to Township storm water management committee and Township Trustees for review and comment. 2. Review updated Mahoning County Drainage Manual for potential edits based on completed mapping and tables.

AUSTINTOWN TOWNSHIP YEAR 2 ANNUAL REPORT

Table 3: Construction Site Storm Water Control Plan Minimum Control Measure 4

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
4.1	Adopt erosion and sediment control zoning resolutions	1. Mahoning County Engineers office and Mahoning County Soil and Water Conservation District completed development of <i>Mahoning County Drainage and Sediment Control Manual- Year 2 (2004)</i> . Manual includes: <ul style="list-style-type: none"> ✓ Drainage Design and Engineering ✓ Storm Drainage Systems ✓ Post-Construction Storm Water Management Requirements ✓ Storm Water Pollution Prevention plans and Erosion and sediment Control Requirements ✓ Current Flood Plain Regulations. 	1. Mahoning County has developed E&SC Regulations. The E&SC Regulations are included in the revised and updated <i>Mahoning County Drainage and Sediment Control Manual</i> . 2. Resolution from the Mahoning County Commissioners adopting the revised/updated Drainage Criteria and Erosion & Sediment Control Manual will be in place spring 2005.	1. BMP 4.1 Addresses permit sections: <ul style="list-style-type: none"> ✓ 3.2.4.1.1 ✓ 3.2.4.1.2 ✓ 3.2.4.1.3 ✓ 3.2.4.1.4 ✓ 3.2.4.1.6 ✓ 3.2.4.2.1 ✓ 3.2.4.2.2 ✓ 3.2.4.2.3 2. OEPA Construction General Permit (CGP).	1. Review current Township regulations/resolutions governing Erosion and Sediment Control. 2. Determine necessary modifications to current resolution/regulation in order to adopt <i>Mahoning County Drainage and Erosion and Sediment Control Manual</i> as the Township design manual. 3. Identify potential areas of Manual which from the Township perspective may need to be updated to fit Township requirements. 4. Implement the new requirements contained within the revised/updated Drainage Criteria and Erosion & Sediment Control Manual. 5. Develop necessary support forms, checklists to aid in plan review. 6. Determine how BMP will be evaluated and assessed. 7. Document assessment rationale for reporting.	1. Mahoning County will provide updates/revisions to the Manual periodically based on reviews of actual Manual concepts implemented in the field. 2. Mahoning County will consider Manual user suggestions and feedback on improving Manual content and applicability. 3. Support Mahoning County in conducting Manual workshops.

AUSTINTOWN TOWNSHIP YEAR 2 ANNUAL REPORT

Table 3: Construction Site Storm Water Control Plan Minimum Control Measure 4

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
4.2	Workshops on E&SC Resolutions	1. SWCD held multiple site specific workshops and presentations related to Erosion and Sediment Control.	1. On-site workshops were conducted as contractors and builders had questions relating to ESC practices arose during construction. 2. Significant time and effort by SWCD went into the preparation of the soon to be adopted Mahoning County E&SC Regulations.	1. See BMP 4.1 for permit sections.	1. 2 – Half-day workshops will be scheduled in connection with how to use the updated manual. 2. TSWMC will develop and provide an estimated 2 workshops on erosion and sediment control BMPs in Year 3. Content includes - How to comply with the revised resolutions and how to use the updated manual? 3. Assist County SWMC with developing County and Township relevant Storm water fact sheets. 4. Develop method to track and document workshop attendance. 5. Develop a schedule for completing workshop material and also a schedule for updating workshop materials.	1. Publish workshop on web page. 2. Complete workshop material development.
4.3	Enter into Memorandum of Understanding (MOU) with Mahoning SWCD	1. MOU Review and update completed in Year 2. 2. Mahoning County SWCD will continue to provide site plan review and Site erosion control inspection. 3. MOU provides guidance in delegating SWCD services in relation to Mahoning County Storm Water Plan Compliance.	1. MOU developed and signed between SWCD and the Mahoning County Engineer's Office, outlining cooperative duties/services provided by each entity.	1. BMP 4.3 addresses permit sections 3.2.4.2.2 and 3.2.4.3.4.	1. Review MOU language and update as necessary throughout Year 3. 2. Consider alternative/backup based on SWCD availability in years 3- 5 of the permit.	1. Document MOU changes as necessary.

AUSTINTOWN TOWNSHIP YEAR 2 ANNUAL REPORT

Table 3: Construction Site Storm Water Control Plan Minimum Control Measure 4

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
4.4	<p>Review Erosion & Sediment Control plans/Storm Water Pollution Prevention Plans (SWPPP)</p> <p>Note: BMP name change.</p>	<ol style="list-style-type: none"> 1. Continued current plan review process. 2. Current plan process: <ul style="list-style-type: none"> ✓ Townships review site plans. ✓ Engineer reviews site plans (Springfield Twp.). ✓ SWCD reviews SWPPP and Erosion and Sediment Control plans. 	<ol style="list-style-type: none"> 1. SWCD reviews residential (sub-division) and other projects requiring submission of E/S plans. The updated manual did not change the plan review process. 2. Continue to work with County Engineer, SWCD and Building Departments to provide support for site erosion/sediment reviews. 	<ol style="list-style-type: none"> 1. BMP 4.4 addresses permit section 3.2.4.1.4. 	<ol style="list-style-type: none"> 1. Austintown Township will adopt the Erosion and Sediment Control regulations contained within the <i>Mahoning County Drainage and Erosion and Sediment Control Manual</i>. 2. SWCD will work w/ Mahoning County Engineers office to update website with E&SC Requirements (including checklists). 3. Zoning Inspectors will be cross-trained to review site plans associated w/ E&SC. Currently, review is provided for building zones and building setbacks. 4. Develop Method to track and document number reviewed. 5. Determine how BMP will be evaluated and assessed. 6. Document assessment rationale for reporting. 	<ol style="list-style-type: none"> 1. Track number of plans reviewed for E/S controls. 2. Document date E/S checklist placed on web page. 3. Document Township adoption of E&SC Regulations. 4. Coordinate program elements which need tracking w/ County program tracking needs. Determine benefit of leveraging similar tracking requirements.

AUSTINTOWN TOWNSHIP YEAR 2 ANNUAL REPORT

Table 3: Construction Site Storm Water Control Plan Minimum Control Measure 4

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
4.5	Construction debris collection and disposal	1. SWCD ES&C plan checklist includes Construction Debris Collection and Disposal.	1. Erosion and Sediment Control site inspection checklist was modified in Year 2 to include Construction debris and disposal. 2. Year 3- will focus on investigating methods to collect and document volumes of Construction debris removed and disposed of properly.	1. BMP 4.5 addresses permit section 3.2.4.2.3.	1. Develop standards for appropriate on-site collection systems/containers. 2. Develop appropriate site locations for placing containers. 3. Develop disposal procedures, frequency of pick up and potential secondary containment requirements. 4. Draft resolutions which will allow for enforcement of non-compliance. 5. Develop site inspection requirements and include in Zoning inspectors cross-raining (See BMP 4.4). 6. Determine how BMP will be evaluated and assessed. 7. Document assessment rationale for reporting.	1. SWCD to continue to inspect/evaluate active construction sites, using county enforcement abilities as they are developed. 2. SWCD will track inspections with Urban Site Program (ACCESS database). 3. Using Urban Site Program method to track sites and document violations. Collect quantitative information on volumes and number of violations and corrections for reporting.
4.6	Inspect active sites SWCD will continue inspect active construction sites.	1. SWCD – continued with current construction site inspection program. 2. Began implementation Urban Site Program Database tracking system. 3. Activity Summary-140+ inspections occurred in Year 2. Four sites referred to Ohio EPA for enforcement action. 4. 140+ inspections occurred in Year 2. Four sites referred to Ohio EPA for enforcement action.	1. Active construction sites are inspected/evaluated against compliance conditions set forth in OEPA's Construction General Permit. 2. Inspections are tracked with Urban Site Program (ACCESS database).	1. BMP 4.5 addresses permit section 3.2.4.1.6 2. Inspections provided local impetus for compliance with terms of NPDES/Construction storm water permit.	1. SWCD – continue with current construction site inspection program. 2. Develop method to collect and present data from Urban site Program for reporting purposes. 3. Determine data presentation format. 4. Determine Inspection frequency/schedule. OEPA SWMP comment indicated minimum of once per month. 4. Determine how BMP will be evaluated and assessed. 5. Document assessment rationale for reporting	1. Report out data from Urban Site Program. Number of sites. 2. Summary of recurring violations. 3. Modify E/S controls if necessary to reduce recurring inspection noted deficiencies.

AUSTINTOWN TOWNSHIP YEAR 2 ANNUAL REPORT

Table 3: Construction Site Storm Water Control Plan Minimum Control Measure 4

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
4.7	Enforcement actions	Austintown Township will adopt <i>Mahoning County Drainage and Erosion and Sediment Control Manual</i> , by adopting the manual the following applies: 1. Mahoning County Engineers office and Mahoning County Soil and Water Conservation District completed development of <i>Mahoning County Drainage Erosion and Sediment Control Manual- Year 2 (2004)</i> . 2. Reviewed other County-E/S enforcement requirements/ regulations during development of the updated manual. 3. Notice of Violation form implemented to notify developers/contractors of major non-compliances.	1. Review and track enabling legislation for additional enforcement as passed by the State Legislature. 2. Mahoning County E&S Regulations will be amended as legislation continues to change.	1. BMP addresses permit section 3.2.4.2.6 2. Commissioners will be urged to adopt a resolution allowing the use HB 411 to enable County to enforce regulations.	1. Implement new requirements contained in the updated Drainage and Sediment and Erosion Control Manual. 2. Determine fee structure for NOV and re-inspection fee. Re-inspection fees after 3 consecutive NOVs will be implemented. 3. Determine method to track, record and document Inspections and enforcement actions taken. 4. Determine how BMP will be evaluated and assessed. 5. Document assessment rationale for reporting. 6. Develop method/enforcement mechanism that zoning inspector can issue stop work order. Coordinate w/ County prosecutor as necessary.	1. Mahoning County will provide updates/revisions to the Manual periodically based on reviews of actual Manual concepts implemented in the field. 2. Mahoning County will consider Manual user suggestions and feedback on improving Manual content and applicability.
4.8	Respond to public complaints regarding construction activities	1. Began process of establishing a contact number for public feedback/complaints. 2. Current system in place under Year 2 – Direct complaints to SWCD.	1. Current mechanism in place is to direct complaints through SWCD.	1. BMP 4.7 addresses permit section 3.2.4.2.5.	1. Develop and publish call in number for water quality, construction site pollution complaints. 2. Develop method to track and document complaints. 3. Tracking will allow for follow up and documentation of complaint resolution. 4. Determine how BMP will be evaluated and assessed. 5. Document assessment rationale for reporting. 6. Austintown Township will advertise through newsletter and web site, a phone number for residents concerned about specific construction activities.	1. Establish call in number. 2. Determine tracking and documenting procedures.

AUSTINTOWN TOWNSHIP YEAR 2 ANNUAL REPORT

Table 3: Construction Site Storm Water Control Plan Minimum Control Measure 4

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
4.9	Concrete Truck Wash Out	1. Concrete Truck Wash Out procedures and locations were identified in the updated drainage and erosion and sediment control manual.	1. Checklist developed includes requirements for concrete truck wash-out. 2. CGP was used to develop procedures and text for this BMP. 3. Regulations have been adopted and will be included as addendums to the updated drainage regulations.	1. BMP 4.9 addressed permit section 3.2.4.1.3. 2. E&SC plans are required to designate procedures for concrete truck wash-out.	1. Develop standard drawing for BMP. 2. Document violations and corrections at sites. 3. Determine method to track and document violations and corrective action. 4. Determine how BMP will be evaluated and assessed. 5. Document assessment rationale for reporting.	1. Continue to apply checklist to review SWPPP and E/S plans. 2. Coordinate tracking and data recording needs with other SWMP BMPs.
4.10	Construction Site Ingress/Egress	1. Ingress/Egress BMP procedures were addressed in the updated drainage and erosion and sedimentation control manual.	1. Checklist developed includes requirements for site ingress/egress protection. 2. CGP was used to develop procedures and text for this BMP. 3. Regulations have been adopted and will be included as addendums to the updated drainage regulations.	1. BMP 4.10 addressed permit section 3.2.4.1.3. 2. E&SC plans are required to designate procedures for Construction Site ingress/egress.	1. Develop standard drawing for BMP. 2. Document violations and corrections at sites. 3. Determine method to track and document violations and corrective action. 4. Determine how BMP will be evaluated and assessed. 5. Document assessment rationale for reporting.	1. Continue to apply checklist to review SWPPP and E/S plans. 2. Coordinate tracking and data recording needs with other SWMP BMPs.

AUSTINTOWN TOWNSHIP YEAR 2 ANNUAL REPORT
Table 4: Post-Construction Storm Water Minimum Control Measure 5

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
5.1	Workshops for Post-Construction Regulations Note: BMP name change	1. SWCD held multiple site specific workshops and presentations related to Erosion and Sediment Control. 2. 2 – Half-day workshops will be scheduled in connection with how to use the updated manual. 3. Complete updates to Drainage and Sediment and Erosion Control Manual, which included Post-Construction BMP's. Note: Workshops for Year 2 were sediment/Erosion control focused.	1. On-site workshops were conducted as contractors and builders had questions relating to ESC practices arose during construction. 2. Significant time and effort by SWCD went into the preparation of the soon to be adopted Mahoning County E&SC Regulations. Note: Year 3- workshops will be modified to accommodate Post-Construction Controls.	1. BMP 5.2 addresses permit section 3.2.5.2.3.3. 2. Construction General Permit.	1. Develop materials and schedule a minimum of 2 workshops focused on Mahoning County's Post-Construction BMP's. 2. Develop schedule to perform reviews and updates of workshop materials. 3. Determine how BMP will be evaluated and assessed. 4. Document assessment rationale for reporting. 5. Determine how to track workshop attendance and update workshop materials as necessary.	1. Investigate and identify location or sources that developers, contractors, engineers, builders and public can go to access information on Post-Construction storm water management BMP's.
5.2	Post-Construction Storm Water Management Resolutions- See County table BMP 5.1. Note: By reference this BMP covers BMP's 5.1.1 through 5.1.6 addressed in detail in the county Post-Construction MCM table. (Structural and Non-Structural).	1. Mahoning County Engineers office and Mahoning County Soil and Water Conservation District completed development of <i>Mahoning County Drainage and Sediment Control Manual- Year 2 (2004)</i> . 2. Section 4.4 in the updated Drainage manual addresses this BMP with supporting schematic drawings. 3. County Engineer held a public comment period for the Manual as required by ORC. Comments were incorporated into the manual prior to final edits and presentation to County commissioners.	1. Post-Construction BMP's will begin to be reviewed and assessed beginning in Year 3. 2. Evaluation of BMP will assist in establishing goals and determining effective BMPs for use in Mahoning County.	1. BMP 5.1.1 addresses permit sections: ✓ 3.2.5.2.4 ✓ 3.2.5.2.4.2 ✓ 3.2.5.2.4.3 2. OEPA Construction General Permit (CGP): ✓ Post-Construction Section – Part III.G.2.e	1. Determine method to track BMPs installed for maintenance purposes. 2. Develop BMP maintenance document. 3. Investigate value in developing a GIS layer to locate these on storm water base map. 4. Investigate and establish BMP measurable goals for reporting and evaluation. 5. Determine evaluation or assessment methods to determine appropriateness. 6. Document evaluation rationale for reporting.	1. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools/aids to assist with tracking/reporting. 2. Develop and identify BMP maintenance needs and responsible personnel. 3. Consider developing BMP maintenance manual. OEPA SWMP comment recommends minimum inspection frequency of 1x annually. (See BMP 5.3)

AUSTINTOWN TOWNSHIP YEAR 2 ANNUAL REPORT
Table 4: Post-Construction Storm Water Minimum Control Measure 5

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
5.3	Develop Strategies and Policies to address maintenance of privately owned storm water facilities	1. Austintown Township discussed with County Engineer and County Prosecutor issues related to township authority to require maintenance or maintain private storm water management facilities (residential and commercial) in Year 2.	1. Discussion initiated to begin drafting potential resolution addressing maintenance of residential and commercial storm water management facilities.	1. BMP 5.3 addresses permit section 3.2.3.2.2, 3.2.3.2.3 and 3.2.6.1.4. 2. Continuing legal research concerning township's authority to regulate private storm water facilities.	1. Continue researching and documenting legal authority associated with Townships ability to require maintenance be preformed on private Storm Water Management facilities. 2. Investigate Adopting maintenance standards that would be consistent with the Ohio Revised Code. 3. Investigate level of effort associated with mapping privately owned storm water management facilities for both water quality purposes and more importantly as a tool to assist with water quantity/flood control management. 4. Develop BMP maintenance form. 5. Outline short and long term strategies for BMP maintenance requirements. 6. Determine facility attributes to obtain during mapping of facilities. 7. Determine how BMP maintenance will be evaluated and assessed. 8. Document assessment rationale for reporting.	1. Implementation is dependent of resolution of legal authority issue. 2. Township will identify (map) all privately (residential/commercial/industrial) owned storm water facilities and develop and implement standards for frequency and required maintenance, along with proper documentation of maintenance. Coordinate tracking and data recording needs with other SWMP BMPs, both at the county and Township levels. 3. Consider developing BMP maintenance manual. OEPA SWMP comment recommends minimum inspection frequency of 1x annually. (See BMP 5.3)

AUSTINTOWN TOWNSHIP YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 6

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
6.1	Operation and maintenance program to prevent or reduce storm water pollution from community operations.	1. Completed identification of community operations which will be incorporated into the <i>Storm water BMP Operations and Maintenance Manual</i> .	1. Target date for completion of <i>Storm Water BMP Operations and Maintenance Manual</i> by November 15, 2005.	1. BMP 6.1 addresses permit section 3.2.6 through 3.2.6.2.5	1. Complete development of operations and maintenance procedures for manual. 2. Road Superintendent to continue conducting quarterly training on storm water O&M procedures and reporting. 3. Develop O/M training materials. 4. Document number attended, date, topics. 5. Determine how O/M procedures will be evaluated and assessed. 6. Document assessment rationale for reporting.	1. Begin to implement completed Operation and Maintenance procedures related to storm water pollution reduction. 2. Determine how to collect and record information for reporting purposes. 3. Coordinate program elements which need tracking w/ County program tracking needs. Determine benefit of leveraging similar tracking requirements. 4. Consider developing BMP maintenance manual. OEPA SWMP comment recommends minimum inspection frequency of 1x annually. (See BMP 5.3)

AUSTINTOWN TOWNSHIP YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 6

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
6.2	Staff education program on pollution prevention	1. Completed review of potential training and education materials in Year 2.	1. Target date for completion of staff education program is November 15, 2005.	1. BMP 6.2 addresses permit section 3.2.6.1.1 and 3.2.6.1.2.	1. Identify potential pollution sources/pollution types per maintenance activity to better focus training and O/M practices on. 2. Identify areas/practices/procedures that could be updated and incorporate water quality elements. 3. Develop training schedule and materials based on review of O/M review and focus training on target audience. 4. Determine evaluation or assessment methods to determine BMP appropriateness or effectiveness. 5. Determine methods to track and organize training attendees, when training materials need to be updated and reporting needs.	1. Present training needs to storm water committee. 2. Outline training materials need and develop schedule to develop, secure and build training program. OEAP SWMP comment- Recommends 1x year to hold training. 3. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools/aids to assist with tracking/reporting.
6.3	Street Sweeping	1. Discussed method of reporting street sweepings collected. 2. Sweeping schedule drafted.	1. Performed street swept on every township street in Year 2.	1. BMP 6.3 addresses permit sections: ✓ 3.2.6.2.1 ✓ 3.2.6.2.3.1 ✓ 3.2.6.2.3.2 ✓ 3.2.6.2.3.3 ✓ 3.2.6.2.3.4 ✓ 3.2.6.2.4 ✓ 3.2.6.2.5	1. Draft sweeping schedule and procedures. Tie protocols/procedures to training being developed in 6.2. Post on county web page schedule. 2. Develop forms to record quantity of street sweepings collected. 3. Determine evaluation or assessment methods to determine BMP appropriateness or effectiveness. 4. Develop system to track and store collected information for reporting purposes.	1. Perform and record street sweeping activities- number of miles, amount collected. 2. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools/aids to assist with tracking/reporting.

AUSTINTOWN TOWNSHIP YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 6

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
6.4	Litter Pickup	<ol style="list-style-type: none"> 1. Continued Annual Litter Pick-up program. 2. Discussed method to collect & document quantities collected. 3. \$7,400 in labor costs spent in 2004 on debris cleanup. 	<ol style="list-style-type: none"> 1. Austintown Township will develop method to collect and document quantities collected by November 15, 2005. 	BMP 6.4 addresses permit section 3.2.6.2.3.2	<ol style="list-style-type: none"> 1. Draft procedures to collect and report quantities of trash collected. Develop forms as necessary to track collections. 2. Draft method to track and report. 3. Determine evaluation or assessment methods to determine BMP appropriateness or effectiveness. 	<ol style="list-style-type: none"> 1. Hold or coordinate litter pickup(s) and document amounts collected. 2. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools/aids to assist with tracking/reporting.
6.5	Salt Storage and Applications	<ol style="list-style-type: none"> 1. Road Superintendent reviewed salt drainage system and cleanup procedures with staff. 2. Reviewed current site drainage at Township storage facilities. 3. Drainage from reviewed salt storage areas are directed into a storm water retention facility. 	<ol style="list-style-type: none"> 1. De-icing materials are stored under cover (salt domes and salt sheds) in a manner that minimizes commingling with surface runoff. 	<ol style="list-style-type: none"> 1. BMP 6.5 addresses permit sections: <ul style="list-style-type: none"> ✓ 3.2.6.2.1 ✓ 3.2.6.2.3.1 ✓ 3.2.6.2.3.2 ✓ 3.2.6.2.3.3 ✓ 3.2.6.2.3.4 ✓ 3.2.6.2.4 ✓ 3.2.6.2.5 	<ol style="list-style-type: none"> 1. Conduct drainage survey of all storage facilities (Salt storage, material storage, by-product storage, spoil storage, liquid storage and secondary containment storage, etc.). 2. Document findings and determine method to prioritize locations in need of modifications or upgrades. 3. Develop written clean up procedures. 4. Draft salt storage procedures. 5. Document application procedures and procedures for clean up if excess salt is applied or a salt spill occurs. 6. Track and evaluate the BMP and document effectiveness. 7. Determine how to evaluate/assess modifications and post event clean up activities or procedures. 	<ol style="list-style-type: none"> 1. Modify drainage system if necessary. 2. Implement developed and documented clean up procedures, salt storage procedures and application procedures. 3. Record total de-icing material used annually. 4. Complete storage facility drainage/outfall inventory. 5. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools/aids to assist with tracking/reporting.

AUSTINTOWN TOWNSHIP YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 6

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
6.6	Mowing Practices	<ol style="list-style-type: none"> Review in field fueling practices. Began documentation of staff practices related to clean fueling and mowing practices. 	<ol style="list-style-type: none"> Review completed in Year 2. 	BMP 6.6 addresses permit section 3.2.6.2.3.1	<ol style="list-style-type: none"> Document in field fueling practices and other mowing operations practices with staff before cutting season. Develop method to track personnel provided training. Develop method to evaluate BMP effectiveness for report. Investigate water quality value of modifying current mowing height. 	<ol style="list-style-type: none"> Continue to practice clean in field fueling practices and other mowing practices. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools/aids to assist with tracking/reporting.
6.7	Storm Water System Maintenance	<ol style="list-style-type: none"> Approximately \$33,000 in labor costs spent in 2004 on CB maintenance/inspections. Estimated \$8,000 in labor costs spent in 2004 on inspecting creeks after major storms. Estimated \$17,000 labor cost spent on ditch maintenance. 	<ol style="list-style-type: none"> Austintown Township will begin developing methods in Year 3 to quantify volumes. 	1. BMP 6.7 addresses permit sections: <ul style="list-style-type: none"> ✓ 3.2.6.2.1 ✓ 3.2.6.2.3.1 ✓ 3.2.6.2.3.2 ✓ 3.2.6.2.3.3 ✓ 3.2.6.2.3.4 ✓ 3.2.6.2.4 ✓ 3.2.6.2.5 	<ol style="list-style-type: none"> Develop documented procedures and standards for cleaning and disposing of spoil materials. Document current catch basin and ditch maintenance and inspection program and schedule. Develop Checklist to assist with documentation of catch basins cleaned and linear footage of ditches cleaned/maintained. Develop method to evaluate BMP effectiveness for reporting. 	<ol style="list-style-type: none"> Continue the current catch basin and ditch maintenance and inspection program. Present draft procedures to TSWMC for comment. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools/aids to assist with tracking/reporting.
6.8	Storage of construction materials and disposal of spoil	<ol style="list-style-type: none"> Continue current practice of storing bulk materials inside or under cover. Township construction debris was properly disposed of in a certified landfill per waste type. 	<ol style="list-style-type: none"> Austintown Township will begin drafting documentation in Year 3 for storage and disposal procedures associated with construction materials, maintenance/ construction spoil materials. 	BMP 6.8 addresses permit section 3.2.6.2.3.3	<ol style="list-style-type: none"> Review current storage practices. Draft storage and disposal procedures or modifications. Develop method to record amount and type of debris disposed of as follows: <ul style="list-style-type: none"> • Lbs. of soil. • Lbs. of stone. • Lbs. of other. Develop method to track personnel provided training. Develop method to evaluate BMP effectiveness for report. 	<ol style="list-style-type: none"> Modify current storage practice of bulk materials based on review. Begin to record amount and type of debris disposed of. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools/aids to assist with tracking/reporting.

AUSTINTOWN TOWNSHIP YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 6

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
6.9	Fleet Maintenance	1. Vehicle site maintenance and vehicle washing location drainage reviewed. 2. Vehicle fluid recycling procedures reviewed.	1. Based on review vehicle maintenance site drainage is directed to storm water retention facility. 2. Runoff from vehicle washings collects inside trap.	1. BMP 6.9 addresses permit sections: ✓ 3.2.6.2.1 ✓ 3.2.6.2.3.1 ✓ 3.2.6.2.3.2 ✓ 3.2.6.2.3.3 ✓ 3.2.6.2.3.4 ✓ 3.2.6.2.4 ✓ 3.2.6.2.5	1. Develop vehicle fluid recycling form to begin documentation of amounts of vehicle fluids recycled and disposed of. 2. Draft storm water retention facility (sediment pond) maintenance and spoil disposal plan. 3. Draft Inside Trap cleaning frequency and procedures. 4. Track and evaluate BMP and document effectiveness. 5. Draft Fleet vehicle washing procedures and location requirements for performing vehicle washing.	1. Document amount of vehicle fluids recycled and disposed of. 2. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools/aids to assist with tracking/reporting. 3. Begin documentation of any facility drainage modifications related vehicle washing or floor drain reconnection or relocation.
6.10	Recycling/Separation/Disposal	1. Vehicle maintenance recycles oil as fuel for heater. 2. Freon is reused by vehicle maintenance 3. Tires recycled.	1. Document these amounts in Year 3: <ul style="list-style-type: none"> • Freon is recovered for reuse. • Paper, cardboard, cans, glass, • tires • #1 and #2 plastics 	1. BMP 6.10 addresses permit sections: ✓ 3.2.6.2.1 ✓ 3.2.6.2.3.1 ✓ 3.2.6.2.3.2 ✓ 3.2.6.2.3.3 ✓ 3.2.6.2.3.4 ✓ 3.2.6.2.4 ✓ 3.2.6.2.5	1. Develop procedures to document collected amounts of: <ul style="list-style-type: none"> ✓ Oil, ✓ Freon and ✓ Tires ✓ Paper, Cardboard, Glass and cans. ✓ #1 and #2 plastics. 2. Develop form to assist with tracking and evaluation of BMP effectiveness. 3. Develop method to track and report quantities.	1. Begin to document the quantities of materials recycled/reused/disposed of. 2. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools/aids to assist with tracking/reporting.

AUSTINTOWN TOWNSHIP YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 6

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
6.11	Oil / Water Separators	1. Followed manufacturer maintenance recommendations for use, scheduled cleaning and disposal of spoil material.	1. Current maintenance program is documented as effective.	1. BMP 6.11 addresses permit sections: ✓ 3.2.6.2.1 ✓ 3.2.6.2.3.1 ✓ 3.2.6.2.3.2 ✓ 3.2.6.2.3.3 ✓ 3.2.6.2.3.4 ✓ 3.2.6.2.4 ✓ 3.2.6.2.5	1. Develop method and form to track and record frequency of maintenance and amount of spoil removed. 2. Document maintenance procedures for Township Oil/Water separators. 3. Track, evaluate and report number cleaned, lbs. of spoil collected and determine how to assess effectiveness of BMP.	1. Begin to develop maintenance and documentation procedures. 2. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools/aids to assist with tracking/reporting.
6.12	Spill Management Procedures	1. Spill management procedures reviewed. 2. Spill management and initial response is the responsibility of the Austintown Fire Department.	1. Procedures reviewed. No recommendations for updating currently.	1. Procedures used are those approved by the Mahoning County Hazmat Department and the Austintown Fire Department.	1. Continue to review spill management procedures and update as needed. 2. Determine with assistance from Township Fire Department how to document number of Spill responses during permit year? 3. Investigate benefit developing Spill incident storm water system base map? 4. Determine how to evaluate and assess BMP?	1. Continue to use the spill management procedures presently approved by Haz-Mat and Fire and update as needed. 2. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools/aids to assist with tracking/reporting.

BEAVER TOWNSHIP YEAR 2 ANNUAL REPORT
Table 1: Public Involvement/Participation Minimum Control Measure 1&2

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
1.1	Township Storm Water Management Committee	1. Attend County Storm Water Committee meetings 2. Key Township committee activities: <ul style="list-style-type: none"> • Township Storm Water committee to develop schedule for BMP implementation. 	1. Limited time on behalf of Township officials 2. Severe flooding, in May and September 2004, federal disaster assistance was approved for citizens and local governments for Mahoning County. As a result of these events BMP and plan activity implementation was limited.	1. BMP 1.1 addresses permit sections 3.2.1.2.3 and 3.2.2.2.3.	1. Township storm water management committee members will continue to attend County Storm water committee meetings. 2. Township storm water management committee will perform the following activities in Year 3: <ul style="list-style-type: none"> ✓ Develop township BMP implementation schedule. ✓ Develop BMP table and determine responsible personnel for implementation, documentation and maintenance activities associated with BMP's. 3. 4. Determine how Township storm water BMP implementation, maintenance and support activities will tracked, collected and reported. 5. Determine how BMP will be evaluated and assessed.	1. Present BMP implementation schedule to County Storm Water Committee. 2. Present BMP Implementation plan to Township Trustees.
1.2	Newsletters	1. <i>Mahoning Matters</i> : Quarterly publication of Mahoning SWCD – distributed to 104,686 county residents. 2. <i>Pipeline</i> – published twice a year by County Sanitary Engineer – distributed to 44,000 households 3. Oct-Nov-Dec Teacher Education Newsletter topic “Storm Water & Water Use” was printed and circulated to students.	1. <i>Mahoning Matters</i> – Title of Article printed in 2004. 2. <i>Pipeline</i> - Title of article printed in 2004. 3. Education Newsletter was distributed during Year 2.	1. BMP 1.3 addresses permit section 3.2.1.2.5. Due to budget constraints within the county, the SWCD staff hours were reduced. The Education Specialist resigned; consequently, educational programs have been cut dramatically.	1. Quarterly coverage for <i>Mahoning Matters</i> article. 2. One update in the <i>Pipeline</i> per year will continue to be an objective in Year 3. 3. Document number of newsletters published.	1. Collect copies of both articles.

BEAVER TOWNSHIP YEAR 2 ANNUAL REPORT
Table 1: Public Involvement/Participation Minimum Control Measure 1&2

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
1.3	Public Meetings	<ol style="list-style-type: none"> 1. Document updates/revisions to SWMP. 2. Develop methods to increase public involvement. 	<ol style="list-style-type: none"> 1. SWMP made one presentation at a Township Meeting during Year two. 	<ol style="list-style-type: none"> 1. BMP 1.3 addresses permit section 3.2.1.2.4, 3.2.1.2.6 and 3.2.2.2.2. 	<ol style="list-style-type: none"> 1. Continue to encourage public involvement related to storm water issues during Township Trustee meetings. 2. Develop a Public involvement plan for citizens to become involved the Townships storm water program. 3. Determine pollutants TSWMC will target. 4. Determine how information for this BMP will be collected, tracked, documented and reported. 5. Determine how BMP will be evaluated and assessed 	<ol style="list-style-type: none"> 1. Continue to seek public input on the implementation of the SMWP. 2. Present identified target pollutants to Township trustees and coordinate with County storm water committee to align goals and objectives.

BEAVER TOWNSHIP YEAR 2 ANNUAL REPORT
Table 1: Public Involvement/Participation Minimum Control Measure 1&2

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
1.4	Website	<ol style="list-style-type: none"> 1. Website/Web page will be developed during Year three. Township Zoning Inspector currently discussing implementation of a website with township trustees. 2. Schedule will be completed by the end of Year 3. 	<ol style="list-style-type: none"> 1. Severe flooding, in May and September 2004, federal disaster assistance was approved for citizens and local governments for Mahoning County. As a result of these events BMP and plan activity implementation was limited. 	<ol style="list-style-type: none"> 1. BMP 1.6 addresses permit section 3.2.1.5.2 	<ol style="list-style-type: none"> 1. Complete development of web page. 2. Determine method to collect and post township storm water information on page. 3. Determine how to track, evaluate, assess and document BMP appropriateness. 4. Determine how to archive web page materials. 	<ol style="list-style-type: none"> 1. Activate web page. 2. Provide additional water quality links and materials on page. 3. Determine and document schedule for updating web page materials.
1.5	Community Activities	<ol style="list-style-type: none"> 1. <u>Green Team</u> <ol style="list-style-type: none"> a. Recycling program for both Township facilities and residents. b. Household hazardous waste collection. c. General community clean ups organized by County organizations. d. SWCD events available to all Township residents. e. Special Collection Days: Collections: HHW =212,969 lbs. E-Collection =133,483 lbs. Appliance =265,680 lbs. Christmas Tree =93,725 lbs Christmas Wrap & Card =3,155 lbs Household Battery = 1200. 	<ol style="list-style-type: none"> 1. Green Team now provides the township with (3) three centers for recycling. 2. Provided on a annual basis are appliance drives and household hazardous waste collections. 3. Boardman Township along with the Green Team offer a drop-off point (Township Compost Site) annually for Christmas Trees. 	<ol style="list-style-type: none"> 1. BMP 1.4 address permit sections 3.2.1.2.3, 3.2.1.2.5 and 3.2.2.2.4. 	<ol style="list-style-type: none"> 1. Committee will continue efforts to educate the township on the need for Annual Clean-up Day. Encourage participation by local groups to help clean-up programs throughout the township. 2. Increase our monitoring of existing BMP's and make an adjustment where there is a need. 3. <u>Green Team</u> <ol style="list-style-type: none"> a. Continue classroom and youth group presentations and document attendance. b. Continue teacher curriculum workshops. c. Continue waste assessment activities for small businesses. Begin documentation of program goals, waste reduction documented and summary of programs. d. Continue scheduling Tours/Field Trips. e. Continue cooperative recycling and education 	<ol style="list-style-type: none"> 1. Develop with Recycling Coordinator and Bicentennial Committee a "Clean-up Your Neighborhood" program to continue in Year 3. Continue to tracking amounts and totals reported. 2. Setup public forums and workshops to get community involvement in the implementation at our SWMP. 3. <u>Green Team</u> <ol style="list-style-type: none"> a. Estimated 350 classroom and youth group presentations. b. Estimated 4 teacher curriculum workshops c. Estimated 10 targeted waste assessment activities for small business. d. Estimated 5 targeted tours/ field trips e. Estimated 1 cash for cans, 2 school paper programs, 20 adopt - a - spot. f. Estimated 1

BEAVER TOWNSHIP YEAR 2 ANNUAL REPORT
Table 1: Public Involvement/Participation Minimum Control Measure 1&2

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
					programs to reduce litter. Record collected amounts. f. Continue Special Collection Days 4. Determine how BMP will be evaluated and assessed. 5. Document assessment rationale for reporting in.	Household Hazardous Waste collection, 1 E collection, 1 Appliance collection, 1 Christmas tree collection, 1 Christmas wrap and card collection.
1.6	Brochures, Flyers, Factsheets, and Handouts.	1. Township made available at the Township Hall the following information available from County and other agencies and organizations: <ol style="list-style-type: none"> a. Handouts with building/zoning permits. b. Mahoning SWCD – <i>Mahoning Matters</i> c. Mahoning SWCD – Conservation Car Wash Tips. d. Mahoning SWCD- Water Conservation, Why should you care? e. Ohio EPA – Protecting Ohio’s water. f. OSU Extension Fact Sheets related to Storm Water. g. Map of County watersheds and regulated areas. 2. Update existing Township brochures and other documents with storm water management information.	1. Brochures and flyers were made available to the public at the township Administration office during Year two.	1. BMP 1.5 address permit sections 3.2.1.2.3, 3.2.1.2.5 and 3.2.2.2.4.	1. Continue working with County Storm water committee to develop and contribute information to the following: <ul style="list-style-type: none"> • <i>Mahoning Matters</i> • District Board of Health-Mailer regarding HSTS information. • Mahoning County Green Team • Mahoning County SWCD. 2. Investigate developing Township focused storm water brochure/factsheet. 3. Determine how BMP will be evaluated and assessed. 4. Document assessment rationale for reporting.	1. Diversify “handouts” to reach target audiences. 2. Begin to track and assess storm water program information and update as necessary 3. Coordinate tracking and data recording needs with other SWMP BMPs.

BEAVER TOWNSHIP YEAR 2 ANNUAL REPORT
Table 2: Illicit Discharge Detection and Elimination Plan Minimum Control Measure 3

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
3.1	Map storm sewer system	<ol style="list-style-type: none"> 1. Severe flooding, in May and September 2004, federal disaster assistance was approved for citizens and local governments for Mahoning County. Year 2 – System Mapping was rescheduled for Year 3. Mahoning County is considering several protocols for inventory along with the attributes collected. 2. Township will initiate storm sewer mapping activities in Year 3. 3. Township to coordinate storm sewer inventory with County inventory to standardized system attribute collection. 	<ol style="list-style-type: none"> 1. Severe flooding, in May and September 2004, federal disaster assistance was approved for citizens and local governments for Mahoning County. Year 2 – System Mapping was rescheduled for Year 3. 	<ol style="list-style-type: none"> 1. BMP will address permit section 3.2.3.1.2 and 3.2.3.2.1 2. BMP Assessment here will be based on percent complete per Year between Year 3 and year 	<ol style="list-style-type: none"> 1. Outline System inventory approach/sequence and schedule for system outfalls and Home Sewer Treatment System (HSTS) outfalls. Coordinate HSTS inventory with District Board of Health and Mahoning County Engineers office. 2. Develop inventory protocols. 3. Determine how and where outfall inventory will be stored or filed. 4. Determine how inventory data will be linked with County- GIS mapping to create “Storm Sewer Base Map”. 5. Determine system attributes to be collected. 6. Consider including “Simple” dry weather screening activities (Color, odor, presence of flow) which can be easily performed during inventory as a method to begin identification of potential illicit discharge locations. 	<ol style="list-style-type: none"> 1. Begin inventory. 2. Complete base map for use in inventory. 3. Document process (Protocol). 4. Draft revised completion schedule. 5. Address the Dry weather screening issue.

BEAVER TOWNSHIP YEAR 2 ANNUAL REPORT
Table 2: Illicit Discharge Detection and Elimination Plan Minimum Control Measure 3

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
3.2	Develop program to detect and eliminate illicit discharges	1. Severe flooding, in May and September 2004, federal disaster assistance was approved for citizens and local governments for Mahoning County. Year 2 – System Mapping was rescheduled for Year 3. The Township will initiate storm sewer system mapping and inventory preparation activities in Year 3-scheduled completion date in permit Year 5.	1. Severe flooding, in May and September 2004, federal disaster assistance was approved for citizens and local governments for Mahoning County. Year 2 – System Mapping was rescheduled for Year 3. The Township will initiate storm sewer system mapping and inventory preparation activities in Year 3-scheduled completion date in permit Year 5.	1. BMP 3.2 addresses permit sections: ✓ 3.2.3.1.3 ✓ 3.2.3.1.4 ✓ 3.2.3.1.5 ✓ 3.2.3.2.2 ✓ 3.2.3.2.3 ✓ 3.2.3.2.4 ✓ 3.2.3.2.4.1 ✓ 3.2.3.2.4.2 ✓ 3.2.3.2.4.3 ✓ 3.2.3.2.4.4 2. Wastewater discharges that are identified during any inspection are required to be corrected to comply with Section 2 part C,D,E,F, & G of the Regulation of Household Sewage Disposal Systems. 3. Off-lot discharges are permitted for wastewater when an on-lot system can not be installed and the off-lot system is installed to comply with the Regulations of Household Sewage Disposal Systems Section 2 part G.	1. Begin development of Illicit Discharge Ordinance/resolution. Outline suggested enforcement procedures. (3.2.3.1.3 and 3.2.3.2.3). Develop draft schedule for implementation. 2. Develop preliminary Illicit Discharge Elimination Plan (IDEP). Plan should include procedures for detection and process for removal and reporting. IDEP should include schedule and implementation steps. (3.2.3.1.4, 3.2.3.2.2, 3.2.3.2.4) 3. Develop IDEP program factsheet for public and employee use. (3.2.3.1.5) 4. Develop preliminary Dry Weather Screening Plan. (3.2.3.2.4.1 and 3.2.3.2.4.2). 5. Process for prioritizing “Hot Spot” areas. 6. Develop general procedures for removing identified illicit discharges. 7. Develop BMP evaluation/assessment criteria or procedures. Document status for annual report in Year 3. 7. Determine storage/file location of collected IDEP information/elimination data/follow up action-required or taken. 8. Determine how BMP will be evaluated and assessed. 9. Document assessment rationale for reporting.	1. Work with County engineer and Township Trustees to complete and obtain approval of Illicit Discharge Ordinance/resolution. 2. Work with County Sanitary Engineer, District Board of Health, Townships and Mill Creek Metroparks to draft both Illicit Discharge Ordinance language and to outline the IDEP program for the County. 3. Determine the following: ✓ Champion for IDEP program. ✓ Where IDEP will be filed and how will data be linked with County GIS. ✓ Determine whether the Dry Weather Screening will be performed during inventories. ✓ Complete schedule ✓ OEPA recommended 100 % dry weather screening be completed between Year 3 and Year 5. ✓ Draft NOV form. ✓ Evaluation process.

BEAVER TOWNSHIP YEAR 2 ANNUAL REPORT
Table 2: Illicit Discharge Detection and Elimination Plan Minimum Control Measure 3

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
3.3	Adopt resolutions prohibiting illicit discharges	<ol style="list-style-type: none"> 1. Began Ohio Revised Code (ORC) and Township authority research related to County authority to implement regulations related to illicit discharge. 2. Present draft zoning resolution to Township Storm Water Committee. 	<ol style="list-style-type: none"> 1. Background research into legal authority was partially completed in Year 2. 2. Wastewater discharges that are identified during any inspection are required to be corrected to comply with Section 2 part C,D,E,F, & G of the Regulation of Household Sewage Disposal Systems. 3. Off-lot discharges are permitted for wastewater when an on-lot system can not be installed and the off-lot system is installed to comply with the Regulations of Household Sewage Disposal Systems Section 2 part G. 	1. See BMP 3.2 for permit sections.	<ol style="list-style-type: none"> 1. Complete research. See BMP 3.2 for sequence details. 2. Draft summary of findings document. 3. Prepare draft Illicit Discharge regulation including: <ul style="list-style-type: none"> ✓ Prohibition of Illicit discharges and illegal dumping. ✓ Enforcement ✓ Private property access for investigative purposes to determine illicit source. ✓ First offense warning-NOV. 4. Determine how BMP will be evaluated and assessed. 5. Document assessment rationale for reporting. 	<ol style="list-style-type: none"> 1. Present Draft Illicit Discharge regulation to Township Storm water committee for review and comment. 2. Revise regulation based on comments. 3. Schedule meeting with Township Trustees to present draft regulation. 4. Follow through regulation adoption process to achieve passage of draft regulation(s).

BEAVER TOWNSHIP YEAR 2 ANNUAL REPORT
Table 2: Illicit Discharge Detection and Elimination Plan Minimum Control Measure 3

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
3.4	<p>Total Maximum Daily Load (TMDL) (Ohio EPA Permit Section 1.3.6) County and Township procedures should be able to demonstrate how they determined the amount of pollutant needed to be reduced within the impaired stream segment(s), and how much pollutant was reduced (i.e., water sampling to verify the amounts removed).</p>	<ol style="list-style-type: none"> 1. Table completed identifying Approved and pending TMDLs within Ohio. 2. Preliminary Mahoning County map developed showing proposed TMDL's. Map identifies regulated MS4 permit boundaries and overlays this information onto TMDL delineated watersheds. 	<ol style="list-style-type: none"> 1. County's consultant currently has a system in place to identify the TMDL watersheds located throughout the county. 2. Began development of regulated areas which overlay on top of TMDL watershed. Table includes approved and pending approval TMDLs only. 	<ol style="list-style-type: none"> 1. BMP 3.5 addresses permit section 1.3.6. 2. OEPA Construction General Permit. 	<ol style="list-style-type: none"> 1. Provide information and assistance for Mahoning County to complete TMDL layer development for the storm water Base Map. 2. Provide assistance to assist Mahoning County with completing TMDL table. Table will include the following: <ul style="list-style-type: none"> ✓ TMDL HUC code and stream name. ✓ General Description of location. ✓ Summary of causes and sources. 3. Investigate and document Township potential sources as identified in TMDL. 4. Document all assumptions made during potential source assessments. 5. Assist through Township Storm Water Management Committee with drafting outline of process to be developed in Year 5 of permit term which preliminary procedures to be implemented to address identified sources on a planning and project basis. 6. Determine how BMP will be evaluated and assessed. 7. Document assessment rationale for reporting. 	<ol style="list-style-type: none"> 1. Present map and table to Township storm water management committee and Township Trustees for review and comment. 2. Review updated Mahoning County Drainage Manual for potential edits based on completed mapping and tables.

BEAVER TOWNSHIP YEAR 2 ANNUAL REPORT

Table 3: Construction Site Storm Water Control Plan Minimum Control Measure 4

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
4.1	Adopt erosion and sediment control zoning resolutions	1. Mahoning County Engineers office and Mahoning County Soil and Water Conservation District completed development of <i>Mahoning County Drainage and Sediment Control Manual- Year 2 (2004)</i> . Manual includes: <ul style="list-style-type: none"> ✓ Drainage Design and Engineering ✓ Storm Drainage Systems ✓ Post-Construction Storm Water Management Requirements ✓ Storm Water Pollution Prevention plans and Erosion and sediment Control Requirements ✓ Current Flood Plain Regulations. 	1. Mahoning County has developed E&SC Regulations. The E&SC Regulations are included in the revised and updated <i>Mahoning County Drainage and Sediment Control Manual</i> . 2. Resolution from the Mahoning County Commissioners adopting the revised Drainage Criteria and Erosion & Sediment Control Manual will be in place spring 2005.	1. BMP 4.1 Addresses permit sections: <ul style="list-style-type: none"> ✓ 3.2.4.1.1 ✓ 3.2.4.1.2 ✓ 3.2.4.1.3 ✓ 3.2.4.1.4 ✓ 3.2.4.1.6 ✓ 3.2.4.2.1 ✓ 3.2.4.2.2 ✓ 3.2.4.2.3 2. OEPA Construction General Permit (CGP).	1. Review current Township regulations and resolutions governing Erosion and Sediment Control. 2. Determine necessary modifications to current resolution regulation in order to adopt <i>Mahoning County Drainage and Erosion and Sediment Control Manual</i> as the Township design manual. 3. Identify potential areas of Manual which from the Township perspective may need to be updated to fit Township requirements. 4. Implement the new requirements contained within the revised updated Drainage Criteria and Erosion & Sediment Control Manual. 5. Develop necessary support forms, checklists to aid in plan review. 6. Determine how BMP will be evaluated and assessed. 7. Document assessment rationale for reporting.	1. Mahoning County will provide updates revisions to the Manual periodically based on reviews of actual Manual concepts implemented in the field. 2. Mahoning County will consider Manual user suggestions and feedback on improving Manual content and applicability. 3. Support Mahoning County in conducting Manual workshops.

BEAVER TOWNSHIP YEAR 2 ANNUAL REPORT

Table 3: Construction Site Storm Water Control Plan Minimum Control Measure 4

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
4.2	Workshops on E&SC Resolutions	1. SWCD held multiple site specific workshops and presentations related to Erosion and Sediment Control.	1. Significant time and effort by SWCD went into the preparation of the soon to be adopted Mahoning County E&SC Regulations	1. See BMP 4.1 for permit sections.	1. 2 – Half-day workshops will be scheduled in connection with how to use the updated manual. 2. TSWMC will develop and provide an estimated 2 workshops on erosion and sediment control BMPs in Year 3. Content includes - How to comply with the revised resolutions and how to use the updated manual? 3. Assist County SWMC with developing County and Township relevant Storm water fact sheets. 4. Develop method to track and document workshop attendance. 5. Develop a schedule for completing workshop material and also a schedule for updating workshop materials.	1. Publish workshop on web page. 2. Complete workshop material development.
4.3	Enter into Memorandum of Understanding (MOU) with Mahoning SWCD	1. MOU to be signed in first quarter of Year Two and remain in effect for duration of MCSWP. 2. Coordinate with County on any MOU revisions.	1. MOU developed and signed between SWCD and the Mahoning County Engineer's Office, outlining cooperative duties and services provided by each entity.	1. BMP 4.3 addresses permit sections 3.2.4.2.2 and 3.2.4.3.4.	1. Review MOU language and update as necessary throughout Year 3. 2. Consider and alternative based on SWCD availability in years 3- 5 of the permit.	1. Document MOU changes as necessary.

BEAVER TOWNSHIP YEAR 2 ANNUAL REPORT

Table 3: Construction Site Storm Water Control Plan Minimum Control Measure 4

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
4.4	<p>Review Erosion & Sediment Control plans/Storm Water Pollution Prevention Plans (SWPPP)</p> <p>Note: BMP name change.</p>	<ol style="list-style-type: none"> Continued current plan review process. Current plan process: <ul style="list-style-type: none"> ✓ Townships review site plans. ✓ Engineer reviews site plans (Springfield Twp.). ✓ SWCD reviews SWPPP and Erosion and Sediment Control plans. 	<ol style="list-style-type: none"> SWCD reviews residential (sub-division) and other projects requiring submission of E and S plans. The updated manual did not change the plan review process. Continue to work with County Engineer, SWCD and Building Departments to provide support for site erosion and sediment reviews. 	<ol style="list-style-type: none"> BMP 4.4 addresses permit section 3.2.4.1.4. 	<ol style="list-style-type: none"> Beaver Township will adopt the Erosion and Sediment Control regulations contained within the <i>Mahoning County Drainage and Erosion and Sediment Control Manual</i>. SWCD will work with Mahoning County Engineers office to update website with E&SC Requirements (including checklists). Develop Method to track and document number reviewed. Determine how BMP will be evaluated and assessed. Document assessment rationale for reporting. 	<ol style="list-style-type: none"> Track number of plans reviewed for E and S controls. Document date E and S checklist placed on web page. Document Township adoption of E&SC Regulations. Coordinate program elements which need tracking with County program tracking needs. Determine benefit of leveraging similar tracking requirements.
4.5	<p>Construction debris collection and disposal</p>	<ol style="list-style-type: none"> SWCD ES&C plan checklist includes Construction Debris Collection and Disposal. 	<ol style="list-style-type: none"> Erosion and Sediment Control site inspection checklist was modified in Year 2 to include Construction debris and disposal. Year 3- will focus on investigating methods to collect and document volumes of Construction debris removed and disposed of properly. 	<ol style="list-style-type: none"> BMP 4.5 addresses permit section 3.2.4.2.3. 	<ol style="list-style-type: none"> Develop method to track sites with collection control in place. Review current zoning language, modify if necessary. Develop disposal procedures, frequency of pick up and potential secondary containment requirements. Draft resolutions which will allow for enforcement of non-compliance. Determine how BMP will be evaluated and assessed. Document assessment rationale for reporting. 	<ol style="list-style-type: none"> SWCD to continue to inspect and evaluate active construction sites, using county enforcement abilities as they are developed. SWCD will track inspections with Urban Site Program (ACCESS database). Using Urban Site Program method to track sites and document violations. Collect quantitative information on volumes and number of violations and corrections for reporting.

BEAVER TOWNSHIP YEAR 2 ANNUAL REPORT

Table 3: Construction Site Storm Water Control Plan Minimum Control Measure 4

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
4.6	<p>Inspect active sites SWCD will continue inspect active construction sites.</p>	<ol style="list-style-type: none"> SWCD – continued with current construction site inspection program. Began implementation Urban Site Program Database tracking system. 	<ol style="list-style-type: none"> Active construction sites are inspected or evaluated against compliance conditions set forth in OEPA’s Construction General Permit. Inspections are tracked with Urban Site Program (ACCESS database). 	<ol style="list-style-type: none"> BMP 4.5 addresses permit section 3.2.4.1.6 Inspections provided local impetus for compliance with terms of NPDES Construction storm water permit. 	<ol style="list-style-type: none"> SWCD – continue with current construction site inspection program. Develop method to collect and present data from Urban site Program for reporting purposes. Determine data presentation format. Determine Inspection frequency and schedule. OEPA SWMP comment indicated minimum of once per month. Determine how BMP will be evaluated and assessed. Document assessment rationale for reporting 	<ol style="list-style-type: none"> Report out data from Urban Site Program. Number of sites. Summary of recurring violations. Modify E and S controls if necessary to reduce recurring inspection noted deficiencies.
4.7	<p>Enforcement actions</p>	<p>Beaver Township will adopt <i>Mahoning County Drainage and Erosion and Sediment Control Manual</i>, by adopting the manual the following applies:</p> <ol style="list-style-type: none"> Mahoning County Engineers office and Mahoning County Soil and Water Conservation District completed development of <i>Mahoning County Drainage Erosion and Sediment Control Manual- Year 2 (2004)</i>. Reviewed other County-E and S enforcement requirements and regulations during development of the updated manual. Notice of Violation form implemented to notify developers and contractors of major non-compliances. 	<ol style="list-style-type: none"> Review and track enabling legislation for additional enforcement as passed by the State Legislature. Mahoning County E&S Regulations will be amended as legislation continues to change. 	<ol style="list-style-type: none"> BMP addresses permit section 3.2.4.2.6 Commissioners will be urged to adopt a resolution allowing the use HB 411 to enable County to enforce regulations. 	<ol style="list-style-type: none"> Implement new requirements contained in the updated Drainage and Sediment and Erosion Control Manual. Determine fee structure for NOV and re-inspection fee. Re-inspection fees after 3 consecutive NOVs will be implemented. Determine method to track, record and document Inspections and enforcement actions taken. Determine how BMP will be evaluated and assessed. Document assessment rationale for reporting. Develop an enforcement mechanism that zoning inspector can issue stop work order. Coordinate with County prosecutor as necessary. 	<ol style="list-style-type: none"> Mahoning County will provide updates and revisions to the Manual periodically based on reviews of actual Manual concepts implemented in the field. Mahoning County will consider Manual user suggestions and feedback on improving Manual content and applicability.

BEAVER TOWNSHIP YEAR 2 ANNUAL REPORT

Table 3: Construction Site Storm Water Control Plan Minimum Control Measure 4

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
4.8	Respond to public complaints regarding construction activities	1. Began process of establishing a contact number for public feedback. 2. Current system in place under Year 2 – Direct complaints to SWCD. 1. Continue to use the existing checklist, allowing for revisions as deemed necessary. 2. Document number of sites within Township meeting requirements annually.	1. Current mechanism in place is to direct complaints through SWCD. 1. The checklist developed includes requirements for concrete truck wash-out. When the updated E&SC Regulations have been formally adopted, they will be included in an addendum to the sub-division drainage regulations.	1. BMP 4.7 addresses permit section 3.2.4.2.5. 1. BMP 4.9 addressed permit section 3.2.4.1.3. 2. E&SC plans are required to designate procedures for concrete truck wash-out.	1. Develop and publish call in number for water quality, construction site pollution complaints. 2. Develop method to track and document complaints. 3. Tracking will allow for follow up and documentation of complaint resolution. 4. Determine how BMP will be evaluated and assessed. 5. Document assessment rationale for reporting. 6. Austintown Township will advertise through newsletter and web site, a phone number for residents concerned about specific construction activities. 1. Develop standard drawing for BMP. 2. Document violations and corrections at sites. 3. Determine method to track and document violations and corrective action. 4. Determine how BMP will be evaluated and assessed. 5. Document assessment rationale for reporting.	1. Establish call in number. 2. Determine tracking and documenting procedures. 1. Continue to use the existing checklist, allowing for revisions as deemed necessary. 2. Develop means to track number of corrections based on inspections.
4.9	Concrete Truck Wash Out	1. Continue to use the existing checklist, allowing for revisions as deemed necessary. 2. Document number of sites within Township meeting requirements annually.	1. The checklist developed includes requirements for concrete truck wash-out. When the updated E&SC Regulations have been formally adopted, they will be included in an addendum to the sub-division drainage regulations.	1. BMP 4.9 addressed permit section 3.2.4.1.3. 2. E&SC plans are required to designate procedures for concrete truck wash-out.	1. Develop standard drawing for BMP. 2. Document violations and corrections at sites. 3. Determine method to track and document violations and corrective action. 4. Determine how BMP will be evaluated and assessed. 5. Document assessment rationale for reporting.	1. Continue to use the existing checklist, allowing for revisions as deemed necessary. 2. Develop means to track number of corrections based on inspections.
4.10	Construction Site Ingress/Egress	1. Continue to use the existing checklist, allowing for revisions as deemed necessary. 2. Document by Township number of violations and corrections.	1. The checklist developed includes requirements for construction site ingress/egress. 2. When the updated E&SC Regulations have been adopted, they will be included in an addendum to the sub-division drainage regulations.	1. BMP 4.10 addressed permit section 3.2.4.1.3. 2. E&SC plans are required to designate procedures for Construction Site ingress/egress.	1. Develop standard drawing for BMP. 2. Document violations and corrections at sites. 3. Determine method to track and document violations and corrective action. 4. Determine how BMP will be evaluated and assessed. 5. Document assessment rationale for reporting.	1. Continue to use the existing checklist, allowing for revisions as deemed necessary. 2. Develop means to track number of corrections based on inspections.

BEAVER TOWNSHIP YEAR 2 ANNUAL REPORT
Table 4: Post-Construction Storm Water 5

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
5.1	Workshops for Post-Construction Regulations Note: BMP name change	1. SWCD provided numerous brief, audience-specific workshops or presentations on E&SC as requested during Year 2. 2. 2 – Half-day workshops will be scheduled in connection with how to use the updated manual. 3. Complete updates to Drainage and Sediment and Erosion Control Manual, which included Post-Construction BMP's. Note: Workshops for Year 2 were sediment and erosion control focused.	1. Significant time and effort by SWCD went into the preparation of the soon to be adopted Mahoning County E&SC Regulations. Note: Year 3- workshops will be modified to accommodate Post-Construction Controls.	1. BMP 5.2 addresses permit section 3.2.5.2.3.3. 2. Construction General Permit.	1. Develop materials and schedule a minimum of 2 workshops focused on Mahoning County's Post-Construction BMP's. 2. Develop schedule to perform reviews and updates of workshop materials. 3. Determine how BMP will be evaluated and assessed. 4. Document assessment rationale for reporting. 5. Determine how to track workshop attendance and update workshop materials as necessary.	1. Investigate and identify location or sources that developers, contractors, engineers, builders and public can go to access information on Post-Construction storm water management BMP's.

BEAVER TOWNSHIP YEAR 2 ANNUAL REPORT
Table 4: Post-Construction Storm Water 5

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
5.2	Riparian and Wetland setbacks	<ol style="list-style-type: none"> 1. Township currently working to adopt zoning regulations creating setbacks from certain watercourses and wetlands. 2. Riparian setbacks were adopted by the township during Year 2. 3. Zoning Inspector currently enforcing this regulation. 	<ol style="list-style-type: none"> 1. Township adopting riparian zone setbacks during Year 2. 	<ol style="list-style-type: none"> 1. BMP 5.2 addresses permit section 3.2.5.2.3.1 	<ol style="list-style-type: none"> 1. Zoning regulations dedicated to riparian zone setbacks are now in place. 2. Work with County Engineer to track successes. 3. Document lessons learned from implementing regulations. 	<ol style="list-style-type: none"> 1. Will present and explain riparian zoning regulation to township storm water committee once the committee is formed.
5.3	Post-Construction Storm Water Management Resolutions- See County table BMP 5.1. Note: By reference this BMP covers BMP's 5.1.1 through 5.1.6 addressed in detail in the county Post-Construction MCM table. (Structural and Non-Structural).	<ol style="list-style-type: none"> 1. Mahoning County Engineers office and Mahoning County Soil and Water Conservation District completed development of <i>Mahoning County Drainage and Sediment Control Manual- Year 2 (2004)</i>. 2. Section 4.4 in the updated Drainage manual addresses this BMP with supporting schematic drawings. 3. County Engineer held a public comment period for the Manual as required by ORC. Comments were incorporated into the manual prior to final edits and presentation to County commissioners. 	<ol style="list-style-type: none"> 1. Post-Construction BMP's will begin to be reviewed and assessed beginning in Year 3. 2. Evaluation of BMP will assist in establishing goals and determining effective BMPs for use in Mahoning County. 	<ol style="list-style-type: none"> 1. BMP 5.1.1 addresses permit sections: <ul style="list-style-type: none"> ✓ 3.2.5.2.4 ✓ 3.2.5.2.4.2 ✓ 3.2.5.2.4.3 2. OEPA Construction General Permit (CGP): Post-Construction Section – Part III.G.2.e 	<ol style="list-style-type: none"> 1. Determine method to track BMPs installed for maintenance purposes. 2. Develop BMP maintenance document. 3. Investigate value in developing a GIS layer to locate these on storm water base map. 4. Investigate and establish BMP measurable goals for reporting and evaluation. 5. Determine evaluation or assessment methods to determine appropriateness. 6. Document evaluation rationale for reporting. 	<ol style="list-style-type: none"> 1. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking and reporting. 2. Develop and identify BMP maintenance needs and responsible personnel. 3. Consider developing BMP maintenance manual. OEPA SWMP comment recommends minimum inspection frequency of 1x annually. (See BMP 5.3)

BEAVER TOWNSHIP YEAR 2 ANNUAL REPORT
Table 4: Post-Construction Storm Water 5

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
5.4	Develop Strategies and Policies to address maintenance of privately owned storm water facilities	1. Adopt the maintenance standards that are consistent with the Ohio Revised Code.	1. Beaver Township is in the process of implementing this BMP. 2. Process longer than 1 Year from draft to adoption. Will adopt as soon as criteria manual becomes available.	1. BMP 5.3 addresses permit section 3.2.3.2.2, 3.2.3.2.3 and 3.2.6.1.4. 2. Continuing legal research concerning township's authority to regulate private storm water facilities.	1. Adopt the maintenance standards that are consistent with the Ohio Revised Code. 2. Investigate level of effort associated with mapping privately owned storm water management facilities for both water quality purposes and more importantly as a tool to assist with water quantity and flood control management. 3. Develop BMP maintenance form. 4. Outline short and long term strategies for BMP maintenance requirements. 5. Determine facility attributes to obtain during mapping of facilities. 6. Determine how BMP maintenance will be evaluated and assessed. 7. Document assessment rationale for reporting.	1. Implementation is dependent of resolution of legal authority issue. 2. Township will identify (map) all privately (residential/commercial/industrial) owned storm water facilities and develop and implement standards for frequency and required maintenance, along with proper documentation of maintenance. Coordinate tracking and data recording needs with other SWMP BMPs, both at the county and Township levels. 3. Consider developing BMP maintenance manual. OEPA SWMP comment recommends minimum inspection frequency of 1x annually. (See BMP 5.3)

BEAVER TOWNSHIP YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 6

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
6.1	Operation and maintenance program to prevent or reduce storm water pollution from community operations.	1. Process of developing maintenance and operational procedures related to storm water pollution reduction.	1. Target date for completion of storm water O/M by March 2006.	1. BMP 6.1 addresses permit section 3.2.6 through 3.2.6.2.5	1. Complete development of operations and maintenance procedures for manual. Target March 2006. 2. Develop O/M training materials. 3. Document number attended, date, topics. 4. Determine how O/M procedures will be evaluated and assessed.	1. Review draft Operation and Maintenance procedures related to storm water pollution reduction. 2. Track training completed. 3. Present draft M/O to Township Storm Water Committee. 4. Coordinate program elements which need tracking with County program tracking needs. Determine benefit of leveraging similar tracking requirements. 4. Consider developing BMP maintenance manual. OEPA SWMP comment recommends minimum inspection frequency of 1x annually. (See BMP 5.3)

BEAVER TOWNSHIP YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 6

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
6.2	Staff education program on pollution prevention	1. Program not completed due to a lack of training programs	1. Target date for completion of staff education program March 2006.	1. BMP 6.2 addresses permit section 3.2.6.1.1 and 3.2.6.1.2.	<ol style="list-style-type: none"> 1. Draft outline of education program. 2. Complete review of other training/education models for Township. 3. Identify potential pollution sources and pollution types per maintenance activity to better focus training and O/M practices on. 4. Identify areas/practices/procedures that could be updated and incorporate water quality elements. 5. Develop training schedule and materials based on review of O/M review and focus training on target audience. 6. Determine evaluation or assessment methods to determine BMP appropriateness or effectiveness. 7. Determine methods to track and organize training attendees, when training materials need to be updated and reporting needs. 	<ol style="list-style-type: none"> 1. Present training needs to storm water committee. 2. Outline training materials need and develop schedule to develop, secure and build training program. OEAP SWMP comment- Recommends 1x year to hold training. 3. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking.

BEAVER TOWNSHIP YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 6

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
6.3	Street Sweeping	<ol style="list-style-type: none"> 1. Discussed method of reporting street sweepings collected. 2. Sweeping schedule drafted. 	<ol style="list-style-type: none"> 1. Street sweeping conducted in March of 2004-Township hired outside company to complete the work therefore no procedures are in place at this time. Township planning to sweep in March 2005. 	<ol style="list-style-type: none"> 1. BMP 6.3 addresses permit sections: <ol style="list-style-type: none"> 3. 3.2.6.2.1 4. 3.2.6.2.3.1 5. 3.2.6.2.3.2 6. 3.2.6.2.3.3 7. 3.2.6.2.3.4 8. 3.2.6.2.4 9. 3.2.6.2.5 	<ol style="list-style-type: none"> 1. Draft sweeping schedule and procedures. Tie protocols and procedures to training being developed in 6.2. Post on county web page schedule. 2. Develop forms to record quantity of street sweepings collected. 3. Determine evaluation or assessment methods to determine BMP appropriateness or effectiveness. 4. Develop system to track and store collected information for reporting purposes. 	<ol style="list-style-type: none"> 1. Perform and record street sweeping activities- number of miles, amount collected. 2. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking.
6.4	Litter Pickup	<ol style="list-style-type: none"> 1. Draft process to collect and report quantities data on trash collected. 2. Draft method to track and report. 	<ol style="list-style-type: none"> 1. Township will develop method to track and report on quantity collected by March 2006. 	BMP 6.4 addresses permit section 3.2.6.2.3.2	<ol style="list-style-type: none"> 1. Draft procedures to collect and report quantities of trash collected. Develop forms as necessary to track collections. 2. Draft method to track and report. 3. Determine evaluation or assessment methods to determine BMP appropriateness or effectiveness. 	<ol style="list-style-type: none"> 1. Present process and method to Township Storm Water Committee. Implement BMP. 2. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking.

BEAVER TOWNSHIP YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 6

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
6.5	Salt Storage and Applications	1. Severe flooding, in May and September 2004, federal disaster assistance was approved for citizens and local governments for Mahoning County. Year 2 – System Mapping was rescheduled for Year 3. The Township will initiate storm sewer system mapping and inventory preparation activities in Year 3- scheduled completion date in permit Year 5.	1. Review to be performed by middle to late Year 3.	1. BMP 6.5 addresses permit sections: ✓ 3.2.6.2.1 ✓ 3.2.6.2.3.1 ✓ 3.2.6.2.3.2 ✓ 3.2.6.2.3.3 ✓ 3.2.6.2.3.4 ✓ 3.2.6.2.4 ✓ 3.2.6.2.5	1. Develop written clean up procedures. 2. Draft salt storage procedures. 3. Document application procedures and procedures for clean up if excess salt is applied or a salt spill occurs. 4. Track and evaluate the BMP and document effectiveness. 5. Conduct drainage survey of all storage facilities (Salt storage, material storage, by-product storage, spoil storage, liquid storage and secondary containment storage, etc.). 6. Determine how to evaluate modifications and post event clean up activities or procedures.	1. Review of current salt storage not completed due to a lack of time 2. Modify drainage system if necessary. 3. Record total de-icing material used annually. 4. Complete storage facility outfall inventory. 5. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking.
6.6	Mowing Practices	1. Review in field fueling practices. 2. Track and evaluate the BMP and document effectiveness for report.	1. Review to be performed middle to late in Year 3.	BMP 6.6 addresses permit section 3.2.6.2.3.1	1. Document in field fueling practices and other mowing operations practices with staff before cutting season. 2. Develop method to track personnel provided training. 3. Develop method to evaluate BMP effectiveness for report. 4. Investigate water quality value of modifying current mowing height.	1. Continue to practice clean in field fueling practices and other mowing practices. 2. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking.

BEAVER TOWNSHIP YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 6

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
6.7	Storm Water System Maintenance	<ol style="list-style-type: none"> 1. Continue the current maintenance schedule. 2. Develop written procedures and standards. 3. Document number cleaned, volume collected. 	<ol style="list-style-type: none"> 1. Review to be performed middle to late in Year 3. 	<ol style="list-style-type: none"> 1. BMP 6.7 addresses permit sections: <ol style="list-style-type: none"> 10. 3.2.6.2.1 11. 3.2.6.2.3.1 12. 3.2.6.2.3.2 13. 3.2.6.2.3.3 14. 3.2.6.2.3.4 15. 3.2.6.2.4 16. 3.2.6.2.5 	<ol style="list-style-type: none"> 1. Continue the current maintenance schedule. 2. Develop documented procedures and standards for cleaning and disposing of spoil materials. 3. Document current catch basin and ditch maintenance and inspection program and schedule. 4. Develop Checklist to assist with documentation of catch basins cleaned and length of ditches cleaned. 5. Develop method to evaluate BMP effectiveness for reporting. 	<ol style="list-style-type: none"> 1. Continue the current catch basin and ditch maintenance and inspection program. 2. Present draft procedures to TSWC for comment. 3. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking.
6.8	Storage of construction materials and disposal of spoil	<ol style="list-style-type: none"> 1. Township to construct a new facility to store bulk materials, including salt during Year 3. 	<ol style="list-style-type: none"> 1. Review to be performed late in Year 3. 	BMP 6.8 addresses permit section 3.2.6.2.3.3	<ol style="list-style-type: none"> 1. Review current storage practices. 2. Draft storage and disposal procedures or modifications. 3. Develop method to record amount and type of debris disposed of as follows: <ul style="list-style-type: none"> • Lbs. of soil. • Lbs. of stone. • Lbs. of other. 4. Develop method to track personnel provided training. 5. Develop method to evaluate BMP effectiveness for report. 	<ol style="list-style-type: none"> 1. Develop plans to move bulk materials to inside storage. Develop guidelines for storage of construction materials and construction debris. 2. Continue current practice. Track and record the amount and type of debris disposed of.

BEAVER TOWNSHIP YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 6

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
6.9	Fleet Maintenance	1. Begin program to document amount of vehicle fluids recycled and disposed of. Track and evaluate BMP and document effectiveness. 2. Draft sediment basin maintenance and spoil disposal plan.	1. Review to be performed middle to late in Year 3.	1. BMP 6.9 addresses permit sections: ✓ 3.2.6.2.1 ✓ 3.2.6.2.3.1 ✓ 3.2.6.2.3.2 ✓ 3.2.6.2.3.3 ✓ 3.2.6.2.3.4 ✓ 3.2.6.2.4 ✓ 3.2.6.2.5	1. Develop vehicle fluid recycling form to begin documentation of amounts of vehicle fluids recycled and disposed of. 2. Draft storm water retention facility (sediment pond) maintenance and spoil disposal plan. 3. Track and evaluate BMP and document effectiveness. 4. Draft Fleet vehicle washing procedures and location requirements for performing vehicle washing.	1. Document amount of vehicle fluids recycled and disposed of. 2. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking . 3. Begin documentation of any facility drainage modifications related vehicle washing or floor drain reconnection or relocation.
6.10	Recycling/Separation/Disposal	1. Continue to track and evaluate BMP and document effectiveness. Modify as necessary and report on any modifications.	1. Review to be performed middle to late in Year 3.	1. BMP 6.10 addresses permit sections: 17. 3.2.6.2.1 18. 3.2.6.2.3.1 19. 3.2.6.2.3.2 20. 3.2.6.2.3.3 21. 3.2.6.2.3.4 22. 3.2.6.2.4 23. 3.2.6.2.5	1. Develop procedures to document collected amounts of: ✓ Oil, ✓ Tires 2. Develop form to assist with tracking and evaluation of BMP effectiveness. 3. Develop method to track and report quantities.	1. Begin to document the quantities of materials recycled/reused/disposed of. 2. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking .

BOARDMAN TOWNSHIP YEAR 2 ANNUAL REPORT
Table 1: Public Involvement/Participation Minimum Control Measure 1 & 2

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year3 BMP Implementation Activity
1.1	Township Storm Water Management Committee	1. Attend County Storm Water Committee meetings 2. Key Township committee activities: <ul style="list-style-type: none"> • Township Storm Water committee to develop schedule for BMP implementation. 	1. Need to complete implementation schedule for SWMP- BMPs. 2. Severe flooding, in May and September 2004, federal disaster assistance was approved for citizens and local governments for Mahoning County. As a result of these events BMP and plan activity implementation was limited.	1. BMP 1.1 addresses permit sections 3.2.1.2.3 and 3.2.2.2.3.	1. Township storm water management committee members will continue to attend County Storm water committee meetings. 2. Township storm water management committee will perform the following activities in Year 3: <ul style="list-style-type: none"> ✓ Develop township BMP implementation schedule. ✓ Develop BMP table and determine responsible personnel for implementation, documentation and maintenance activities associated with BMP's. 3. Develop Contact plan for: <ul style="list-style-type: none"> ✓ Service Stations ✓ Commercial Properties ✓ Home Owners Association ✓ School properties 4. Determine how Township storm water BMP implementation, maintenance and support activities will tracked, collected and reported. 5. Determine how BMP will be evaluated and assessed.	1. Present completed BMP implementation schedule and contact plan to County Storm Water Committee. 2. Present BMP Implementation plan to Township Trustees.
1.2	Newsletters	1. Continue to place storm water program information in the Township News Letter. 2. Boardman Township Newsletter – published three times annually. 3. Mahoning SWCD Education Newsletter – three times per year during school year.	1. <u>Mahoning Matters</u> – Title of Article printed in 2004. 2. <u>Pipeline</u> - Title of article printed in 2004. 3. Education Newsletter was distributed 2 times during Year 2 to 2,300 teachers and 300 were placed in the public library.	1. BMP 1.3 addresses permit section 3.2.1.2.5. Due to budget constraints within the county, the SWCD staff hours were reduced. The Education Specialist resigned; consequently, educational programs have	1. Assist in drafting information for <i>Mahoning Matters</i> article. 2. One update in the <i>Pipeline</i> per year will continue to be an objective in Year 3. 3. Document number of newsletters published.	1. Collect copies of both articles.

BOARDMAN TOWNSHIP YEAR 2 ANNUAL REPORT
Table 1: Public Involvement/Participation Minimum Control Measure 1 & 2

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year3 BMP Implementation Activity
		4. <i>Mahoning Matters</i> , a quarterly publication of Mahoning SWCD – distributed to 104,686 county residents 5. <i>Pipeline</i> – published twice a year by County Sanitary Engineer – distributed to 44,000 households	4. Township to continue to publish newsletter as part of storm water management goal for educating the public.	been cut dramatically.		
1.3	Special Trustee Meeting	1. Document updates/revisions to SWMP. 2. Develop methods to increase public involvement.	1. The Committee was not able to make updates/revisions in Year 2 due to efforts to develop a township plan on flooding.	Because Year 2 objective was not met, it will become Year 3 objective as well.	1. Continue to encourage public involvement related to storm water issues during Township Trustee meetings. 2. Develop a Public involvement plan for citizens to become involved the Townships storm water program. 3. Consider including a citizen on Township storm water committee (TSWC). 4. Determine pollutants TSWMC will target. 5. Determine how information for this BMP will be collected, tracked, documented and reported. 6. Determine how BMP will be evaluated and assessed.	1. Continue to seek public input on the implementation of the SMWP. 2. Present identified target pollutants to Township trustees and coordinate with County storm water committee to align goals and objectives.

BOARDMAN TOWNSHIP YEAR 2 ANNUAL REPORT
Table 1: Public Involvement/Participation Minimum Control Measure 1 & 2

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year3 BMP Implementation Activity
1.4	Community Activities	<ol style="list-style-type: none"> 1. <u>Green Team</u> <ol style="list-style-type: none"> a. Classroom and youth group presentations completed. Estimated number attended = 395 classroom presentations, estimated 9786 students. b. Teacher curriculum workshops completed. Estimated number of workshops = 6 An estimated 152 attendees. c. Waste assessment activities for small businesses completed. Estimated number of Business Assessed = 12 assessments conducted. d. Tours/Field Trips conducted. Type and number attended : Field Trip type – 11 held Attendance - e. Cooperative recycling Waste education programs to reduce litter. Summary of collection effort = 17,237 lbs. f. Special Collection Days: Collections: HHW =212,969 lbs. E-Collection =133,483 lbs. Appliance =265,680 lbs. Christmas Tree =93,725 lbs Christmas Wrap & Card =3,155 lbs Household Battery = 1200. 	<ol style="list-style-type: none"> 1. <u>Green Team</u> <ol style="list-style-type: none"> a. Classroom presentations completed Year 2. b. Teacher curriculum completed Year 2. c. Waste Assessment criteria established and implemented Year 2. d. Tour/Field trips conducted in Year 2. e. Recycling program documented and performed in Year 2. f. Special collection days scheduled and held Year 2. 	<ol style="list-style-type: none"> 1. <u>Green Team</u> BMP 1.4 address permit sections 3.2.1.2.3, 3.2.1.2.5 and 3.2.2.2.4. 	<ol style="list-style-type: none"> 1. Committee will continue efforts to educate township on the need for Annual Clean-up Day. 2. Encourage participation by local groups to help clean-up programs throughout the township. 3. Increase monitoring of existing BMP's and make an adjustment where there is a need. 4. Begin developing an expanded program that spreads the "twice a year" clean-up program through the entire township. 5. Begin tracking amounts, reporting totals and assessing and modifying selected BMPs as necessary. 6. Complete logistics and legal issues associated with implementing Annual Clean-up Day. 7. Complete logistics and legal issues associated with Implementing Adopt-A-Mile if selected as a BMP.. 8. Develop efficient means for tracking and reporting Township recycled materials. 9. Determine how BMP will be evaluated and assessed. 10. Document assessment rational for reporting in. 	<ol style="list-style-type: none"> 1. Develop with Recycling Coordinator and Bicentennial Committee a "Clean-up Your Neighborhood" program to continue in Year 3. Continue to tracking amounts and totals reported. 2. Setup public forums and workshops to get community involvement in the implementation at our SWMP. 3. <u>Green Team</u> <ol style="list-style-type: none"> a. Estimated 350 classroom and youth group presentations. b. Estimated 4 teacher curriculum workshops c. Estimated 10 targeted waste assessment activities for small business. d. Estimated 5 targeted tours/ field trips e. Estimated 1 cash for cans, 2 school paper programs, 20 adopt - a - spot. f. Estimated 1 Household Hazardous Waste collection, 1 E collection, 1 Appliance collection, 1 Christmas tree collection, 1 Christmas wrap and card collection.

BOARDMAN TOWNSHIP YEAR 2 ANNUAL REPORT
Table 1: Public Involvement/Participation Minimum Control Measure 1 & 2

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year3 BMP Implementation Activity
1.5	Brochures, Flyers, Fact sheets, and Handouts	1. Information made available @ Township Hall: <ol style="list-style-type: none"> a. Handouts with building/zoning permits. b. Mahoning SWCD – <i>Mahoning Matters</i>. c. Mahoning SWCD – Conservation Car Wash Tips. d. Mahoning SWCD- Water Conservation, Why should you care? e. Ohio EPA – Protecting Ohio’s water. f. OSU Extension Fact Sheets related to Storm Water. g. Map of County watersheds and regulated areas. 	<ol style="list-style-type: none"> 1. Collected and organized information for public was made available at Town Hall facility. 2. Township Storm Water Committee continued working with Mahoning County Storm water committee to develop/collect information for County and Township use 	<ol style="list-style-type: none"> 1. BMP 1.5 address permit sections 3.2.1.2.3, 3.2.1.2.5 and 3.2.2.2.4. 	<ol style="list-style-type: none"> 1. Continue working with County Storm water committee to develop and contribute information to the following: <ul style="list-style-type: none"> • <i>Mahoning Matters</i> • District Board of Health- Mailer regarding HSTS information. • Mahoning County Green Team • Mahoning County SWCD. 2. Investigate developing Township focused storm water brochure/factsheet. 3. Determine how BMP will be evaluated and assessed. 4. Document assessment rational for reporting. 	<ol style="list-style-type: none"> 1. Continue to review and assess storm water program information received and update and make available to public at zoning office and town hall. 2. Determine tracking and documenting procedures. 3. Coordinate tracking and data recording needs with other SWMP BMPs.

BOARDMAN TOWNSHIP YEAR 2 ANNUAL REPORT

Table 2: Illicit Discharge Detection and Elimination Plan Minimum Control Measure 3

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
3.1	Map storm sewer system	1. Severe flooding, in May and September 2004, federal disaster assistance was approved for citizens and local governments for Mahoning County. Year 2 – System Mapping was rescheduled for Year 3. Mahoning County is considering several protocols for inventory along with the attributes collected.	1. Severe flooding, in May and September 2004, federal disaster assistance was approved for citizens and local governments for Mahoning County. Year 2 – System Mapping was rescheduled for Year 3.	1. BMP will address permit section 3.2.3.1.2 and 3.2.3.2.1 2. BMP Assessment here will be based on percent complete per year between Year 3 and Year	1. Outline System inventory approach/sequence and schedule for system outfalls and Home Sewer Treatment System (HSTS) outfalls. Coordinate HSTS inventory with District Board of Health and Mahoning County Engineers office. 2. Develop inventory protocols. 3. Determine how and where outfall inventory will be stored or filed. 4. Determine how inventory data will be linked with County- GIS mapping to create “Storm Sewer Base Map”. 5. Determine system attributes to be collected. 6. Consider including “Simple” dry weather screening activities (Color, odor, presence of flow) which can be easily performed during inventory as a method to begin identification of potential illicit discharge locations.	1. Begin inventory. 2. Complete base map for use in inventory. 3. Document process (Protocol). 4. Draft revised completion schedule. 5. Address the Dry weather screening issue.

BOARDMAN TOWNSHIP YEAR 2 ANNUAL REPORT
Table 2: Illicit Discharge Detection and Elimination Plan Minimum Control Measure 3

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
3.2	Develop program to detect and eliminate illicit discharges	1. Severe flooding, in May and September 2004, federal disaster assistance was approved for citizens and local governments for Mahoning County. Year 2 – System Mapping was rescheduled for Year 3. The Township will initiate storm sewer system mapping and inventory preparation activities in Year 3- scheduled completion date in permit Year 5.	1. Severe flooding, in May and September 2004, federal disaster assistance was approved for citizens and local governments for Mahoning County. Year 2 – System Mapping was rescheduled for Year 3. The Township will initiate storm sewer system mapping and inventory preparation activities in Year 3- scheduled completion date in permit Year 5.	1. BMP 3.2 addresses permit sections: ✓ 3.2.3.1.3 ✓ 3.2.3.1.4 ✓ 3.2.3.1.5 ✓ 3.2.3.2.2 ✓ 3.2.3.2.3 ✓ 3.2.3.2.4 ✓ 3.2.3.2.4.1 ✓ 3.2.3.2.4.2 ✓ 3.2.3.2.4.3 ✓ 3.2.3.2.4.4 2. Wastewater discharges that are identified during any inspection are required to be corrected to comply with Section 2 part C,D,E,F, & G of the Regulation of Household Sewage Disposal Systems. 3. Off-lot discharges are permitted for wastewater when an on-lot system can not be installed and the off-lot system is installed to comply with the Regulations of Household Sewage Disposal Systems Section 2 part G.	1. Begin development of Illicit Discharge Ordinance. Outline suggested enforcement procedures. (3.2.3.1.3 and 3.2.3.2.3). Develop draft schedule for implementation. 2. Develop preliminary Illicit Discharge Elimination Plan (IDEP). Plan should include procedures for detection and process for removal and reporting. IDEP should include schedule and implementation steps. (3.2.3.1.4, 3.2.3.2.2, 3.2.3.2.4) 3. Develop IDEP program factsheet for public and employee use. (3.2.3.1.5) 4. Develop preliminary Dry Weather Screening Plan. (3.2.3.2.4.1 and 3.2.3.2.4.2). 5. Process for prioritizing “Hot Spot” areas. 6. Develop general procedures for removing identified illicit discharges. 7. Develop BMP evaluation/assessment criteria or procedures. Document status for annual report in Year 3. 7. Determine storage/file location of collected IDEP information/elimination data/follow up action- required or taken. 8. Determine how BMP will be evaluated and assessed. 9. Document assessment rational for reporting.	1. . Work with County engineer and Township Trustees to complete and obtain approval of Illicit Discharge Ordinance/regulation. 2. Work with County Sanitary Engineer, District Board of Health, Townships and Mill Creek Metroparks to draft both Illicit Discharge Ordinance language and to outline the IDEP program for the County. 3. Determine the following: ✓ Champion for IDEP program. ✓ Where IDEP will be filed and how will data be linked with County GIS. ✓ Determine whether the Dry Weather Screening will be performed during inventories. ✓ Complete schedule ✓ OEPA recommended 100 % dry weather screening be completed between Year 3 and Year 5. ✓ Draft NOV form. ✓ Evaluation process.

BOARDMAN TOWNSHIP YEAR 2 ANNUAL REPORT
Table 2: Illicit Discharge Detection and Elimination Plan Minimum Control Measure 3

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
3.3	Adopt resolutions prohibiting illicit discharges	1. Begin Ohio Revised Code (ORC) and Township authority research related to County authority to implement regulations related to illicit discharge.	1. Based on research results. Regulation/ordinance should include or address the following: ✓ Prohibition of Illicit discharges and illegal dumping. ✓ Enforcement ✓ Private property access for investigative purposes to determine illicit source. ✓ First offense warning- NOV.	1. See BMP 3.2 for permit sections.	1. Complete review/research. See BMP 3.2 for sequence details. 2. Draft summary of findings document. 3. Prepare draft Illicit Discharge regulation including: ✓ Prohibition of Illicit discharges and illegal dumping. ✓ Enforcement ✓ Private property access for investigative purposes to determine illicit source. ✓ First offense warning NOV. 4. Determine how BMP will be evaluated and assessed. 5. Document assessment rational for reporting.	1. Present Draft Illicit Discharge regulation to Township Storm water committee for review and comment. 2. Revise regulation based on comments. 3. Schedule meeting with Township Trustees to present draft regulation. 4. Follow through regulation adoption process to achieve passage of draft regulation(s).

BOARDMAN TOWNSHIP YEAR 2 ANNUAL REPORT
Table 2: Illicit Discharge Detection and Elimination Plan Minimum Control Measure 3

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
3.4	<p>Total Maximum Daily Load (TMDL) (Ohio EPA Permit Section 1.3.6) County and Township procedures should be able to demonstrate how they determined the amount of pollutant needed to be reduced within the impaired stream segment(s), and how much pollutant was reduced (i.e., water sampling to verify the amounts removed).</p>	<ol style="list-style-type: none"> 1. Table completed identifying Approved and pending TMDLs within Ohio. 2. Preliminary Mahoning County map developed showing proposed TMDL's. Map identifies regulated MS4 permit boundaries and overlays this information onto TMDL delineated watersheds. 	<ol style="list-style-type: none"> 1. County's consultant currently has a system in place to identify the TMDL watersheds located throughout the county. 2. Began development of regulated areas which overlay on top of TMDL watershed. Table includes approved and pending approval TMDLs only 	<ol style="list-style-type: none"> 1. BMP 3.5 addresses permit section 1.3.6. 2. OEPA Construction General Permit. 	<ol style="list-style-type: none"> 1. Provide information/assistance for Mahoning County to complete TMDL layer development for the storm water Base Map. 2. Provide assistance to assist Mahoning County with completing TMDL table. Table will include the following: <ul style="list-style-type: none"> ✓ TMDL HUC code and stream name. ✓ General Description of location. ✓ Summary of causes and sources. 3. Investigate and document Township potential sources as identified in TMDL. 4. Document all assumptions made during potential source assessments. 5. Assist through Township Storm Water Management Committee with drafting outline of process to be developed in Year 5 of permit term which preliminary procedures to be implemented to address identified sources on a planning and project basis. 6. Determine how BMP will be evaluated and assessed. 7. Document assessment rational for reporting. 	<ol style="list-style-type: none"> 1. Present map and table to Township storm water management committee and Township Trustees for review and comment. 2. Review updated Mahoning County Drainage Manual for potential edits based on completed mapping and tables.

BOARDMAN TOWNSHIP YEAR 2 ANNUAL REPORT

Table 3: Construction Site Storm Water Control Plan Minimum Control Measure 4

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
4.1	Adopt erosion and sediment control zoning resolutions	1. Mahoning County Engineers office and Mahoning County Soil and Water Conservation District completed development of <i>Mahoning County Drainage and Sediment Control Manual- Year 2 (2004)</i> . Manual includes: <ul style="list-style-type: none"> ✓ Drainage Design and Engineering ✓ Storm Drainage Systems ✓ Post-Construction Storm Water Management Requirements ✓ Storm Water Pollution Prevention plans and Erosion and sediment Control Requirements ✓ Current Flood Plain Regulations.	1. Mahoning County has developed E&SC Regulations. The E&SC Regulations are included in the revised and updated <i>Mahoning County Drainage and Sediment Control Manual</i> . 2. Resolution from the Mahoning County Commissioners adopting the revised/updated Drainage Criteria and Erosion & Sediment Control Manual will be in place spring 2005.	1. BMP 4.1 Addresses permit sections: <ul style="list-style-type: none"> ✓ 3.2.4.1.1 ✓ 3.2.4.1.2 ✓ 3.2.4.1.3 ✓ 3.2.4.1.4 ✓ 3.2.4.1.6 ✓ 3.2.4.2.1 ✓ 3.2.4.2.2 ✓ 3.2.4.2.3 2. OEPA Construction General Permit (CGP).	1. Review current Township regulations/resolutions governing Erosion and Sediment Control. 2. Determine necessary modifications to current resolution/regulation in order to adopt <i>Mahoning County Drainage and Erosion and Sediment Control Manual</i> as the Township design manual. 3. Identify potential areas of Manual which from the Township perspective may need to be updated to fit Township requirements. 4. Implement the new requirements contained within the revised/updated Drainage Criteria and Erosion & Sediment Control Manual. 5. Develop necessary support forms, checklists to aid in plan review. 6. Determine how BMP will be evaluated and assessed. 7. Document assessment rational for reporting.	1. Mahoning County will provide updates/revisions to the Manual periodically based on reviews of actual Manual concepts implemented in the field. 2. Mahoning County will consider Manual user suggestions and feedback on improving Manual content and applicability. 3. Support Mahoning County in conducting Manual workshops.

BOARDMAN TOWNSHIP YEAR 2 ANNUAL REPORT

Table 3: Construction Site Storm Water Control Plan Minimum Control Measure 4

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
4.2	Workshops on E&SC Resolutions	1. SWCD held multiple site specific workshops and presentations related to Erosion and Sediment Control.	1. On-site workshops were conducted as contractors and builders had questions relating to ESC practices arose during construction. 2. Significant time and effort by SWCD went into the preparation of the soon to be adopted Mahoning County E&SC Regulations.	1. See BMP 4.1 for permit sections.	1. 2 – Half-day workshops will be scheduled in connection with how to use the updated manual. 2. TSWMC will develop and provide an estimated 2 workshops on erosion and sediment control BMPs in Year 3. Content includes - How to comply with the revised resolutions and how to use the updated manual? 3. Assist County SWMC with developing County and Township relevant Storm water fact sheets. 4. Develop method to track and document workshop attendance. 5. Develop a schedule for completing workshop material and also a schedule for updating workshop materials.	1. Publish workshop on web page. 2. Complete workshop material development.
4.3	Enter into Memorandum of Understanding (MOU) with Mahoning SWCD	1. MOU provides guidance in delegating SWCD services in relation to Mahoning County Storm Water Plan Compliance.	1. MOU developed and signed between SWCD and the Mahoning County Engineer's Office, outlining cooperative duties/services provided by each entity.	1. BMP 4.3 addresses permit sections 3.2.4.2.2 and 3.2.4.3.4.	1. Review MOU language and update as necessary throughout Year 3. 2. Document any MOU changes.	1. Document MOU changes as necessary.

BOARDMAN TOWNSHIP YEAR 2 ANNUAL REPORT

Table 3: Construction Site Storm Water Control Plan Minimum Control Measure 4

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
4.4	<p>Review Erosion & Sediment Control plans/Storm Water Pollution Prevention Plans (SWPPP)</p> <p>Note: BMP name change.</p>	<ol style="list-style-type: none"> Continued current plan review process. Current plan process: <ul style="list-style-type: none"> ✓ Townships review site plans. ✓ Engineer reviews site plans (Springfield Twp.). ✓ SWCD reviews SWPPP and Erosion and Sediment Control plans. 	<ol style="list-style-type: none"> SWCD reviews residential (sub-division) and other projects requiring submission of E/S plans. The updated manual did not change the plan review process. Continue to work with County Engineer, SWCD and Building Departments to provide support for site erosion/sediment reviews. 	<ol style="list-style-type: none"> BMP 4.4 addresses permit section 3.2.4.1.4. 	<ol style="list-style-type: none"> Boardman Township will adopt the Erosion and Sediment Control regulations contained within the <i>Mahoning County Drainage and Erosion and Sediment Control Manual</i>. SWCD will work with Mahoning County Engineers office to update website with E&SC Requirements (including checklists). Develop Method to track and document number reviewed. Determine how BMP will be evaluated and assessed. Document assessment rational for reporting. 	<ol style="list-style-type: none"> Track number of plans reviewed for E/S controls. Document date E/S checklist placed on web page. Document Township adoption of E&SC Regulations. Coordinate program elements which need tracking with County program tracking needs. Determine benefit of leveraging similar tracking requirements.
4.5	<p>Construction debris collection and disposal</p>	<ol style="list-style-type: none"> SWCD ES&C plan checklist includes Construction Debris Collection and Disposal. 	<ol style="list-style-type: none"> Erosion and Sediment Control site inspection checklist was modified in Year 2 to include Construction debris and disposal. Year 3- will focus on investigating methods to collect and document volumes of Construction debris removed and disposed of properly. 	<ol style="list-style-type: none"> BMP 4.5 addresses permit section 3.2.4.2.3. 	<ol style="list-style-type: none"> Develop standards for appropriate on-site collection systems/containers. Develop appropriate site locations for placing containers. Develop disposal procedures, frequency of pick up and potential secondary containment requirements. Draft resolutions which will allow for enforcement of non-compliance. Develop site inspection requirements and include in Zoning inspectors cross-raining (See BMP 4.4). Determine how BMP will be evaluated and assessed. Document assessment rational for reporting. 	<ol style="list-style-type: none"> SWCD to continue to inspect/evaluate active construction sites, using county enforcement abilities as they are developed. SWCD will track inspections with Urban Site Program (ACCESS database). Using Urban Site Program method to track sites and document violations. Collect quantitative information on volumes and number of violations and corrections for reporting.

BOARDMAN TOWNSHIP YEAR 2 ANNUAL REPORT

Table 3: Construction Site Storm Water Control Plan Minimum Control Measure 4

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
4.6	<p>Inspect active sites SWCD will continue inspect active construction sites.</p>	<ol style="list-style-type: none"> SWCD – continued with current construction site inspection program. Began implementation Urban Site Program Database tracking system. 	<ol style="list-style-type: none"> Active construction sites are inspected/evaluated against compliance conditions set forth in OEPA's Construction General Permit. Inspections are tracked with Urban Site Program (ACCESS database). 	<ol style="list-style-type: none"> BMP 4.5 addresses permit section 3.2.4.1.6 Inspections provided local impetus for compliance with terms of NPDES/Construction storm water permit. 	<ol style="list-style-type: none"> SWCD – continue with current construction site inspection program. Develop method to collect and present data from Urban site Program for reporting purposes. Determine data presentation format. Determine Inspection frequency/schedule. OEPA SWMP comment indicated minimum of once per month. Determine how BMP will be evaluated and assessed. Document assessment rational for reporting 	<ol style="list-style-type: none"> Report out data from Urban Site Program. Number of sites. Summary of recurring violations. Modify E/S controls if necessary to reduce recurring inspection noted deficiencies.
4.7	<p>Enforcement actions</p>	<p>Boardman Township will adopt <i>Mahoning County Drainage and Erosion and Sediment Control Manual</i>, by adopting the manual the following applies:</p> <ol style="list-style-type: none"> Mahoning County Engineers office and Mahoning County Soil and Water Conservation District completed development of <i>Mahoning County Drainage Erosion and Sediment Control Manual- Year 2 (2004)</i>. Reviewed other County-E/S enforcement requirements/regulations during development of the updated manual. 	<ol style="list-style-type: none"> Review and track enabling legislation for additional enforcement as passed by the State Legislature. Mahoning County E&SC Regulations will be amended as legislation continues to change. 	<ol style="list-style-type: none"> BMP addresses permit section 3.2.4.2.6 Commissioners will be urged to adopt a resolution allowing the use HB 411 to enable County to enforce regulations. 	<ol style="list-style-type: none"> Implement new requirements contained in the updated Drainage and Sediment and Erosion Control Manual. Determine fee structure for NOV and re-inspection fee. Re-inspection fees after 3 consecutive NOVs will be implemented. Determine data presentation format. Determine Inspection frequency/schedule. OEPA SWMP comment indicated minimum of once per month. Determine how BMP will be evaluated and assessed. Document assessment rational for reporting. 	<ol style="list-style-type: none"> Report out data from Urban Site Program. Number of sites. Summary of recurring violations. Modify E/S controls if necessary to reduce recurring inspection noted deficiencies.

BOARDMAN TOWNSHIP YEAR 2 ANNUAL REPORT

Table 3: Construction Site Storm Water Control Plan Minimum Control Measure 4

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
4.8	Respond to public complaints regarding construction activities	<ol style="list-style-type: none"> 1. Began process of establishing a contact number for public feedback/complaints. 2. Current system in place under Year 2 – Direct complaints to SWCD. 	<ol style="list-style-type: none"> 1. Current mechanism in place is to direct complaints through SWCD. 	<ol style="list-style-type: none"> 1. BMP 4.7 addresses permit section 3.2.4.2.5. 	<ol style="list-style-type: none"> 1. Develop and publish call in number for water quality, construction site pollution complaints. 2. Develop method to track and document complaints. 3. Tracking will allow for follow up and documentation of complaint resolution. 4. Determine how BMP will be evaluated and assessed. 5. Document assessment rational for reporting. 6. Boardman Township will advertise through newsletter and web site, a phone number for residents concerned about specific construction activities. 	<ol style="list-style-type: none"> 1. Establish call in number. 2. Determine tracking and documenting procedures.
4.9	Concrete Truck Wash Out	<ol style="list-style-type: none"> 1. Concrete Truck Wash Out procedures and locations were identified in the updated drainage and erosion and sediment control manual. 	<ol style="list-style-type: none"> 1. Checklist developed includes requirements for concrete truck wash-out. 2. CGP was used to develop procedures and text for this BMP. 3. Regulations have been adopted and will be included as addendums to the updated drainage regulations. 	<ol style="list-style-type: none"> 1. BMP 4.9 addressed permit section 3.2.4.1.3. 2. E&SC plans are required to designate procedures for concrete truck wash-out. 	<ol style="list-style-type: none"> 1. Continue to use the existing checklist, allowing for revisions as deemed necessary. 2. Document violations and corrections at sites. 3. Determine method to track and document violations and corrective action. 4. Determine how BMP will be evaluated and assessed. 5. Document assessment rational for reporting. 	<ol style="list-style-type: none"> 1. Continue to apply checklist to review SWPPP and E/S plans. 2. Coordinate tracking and data recording needs with other SWMP BMPs.

BOARDMAN TOWNSHIP YEAR 2 ANNUAL REPORT

Table 3: Construction Site Storm Water Control Plan Minimum Control Measure 4

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
4.10	Construction Site Ingress/Egress	1. Ingress/Egress BMP procedures were addressed in the updated drainage and erosion and sedimentation control manual.	1. Checklist developed includes requirements for site ingress/egress protection. 2. CGP was used to develop procedures and text for this BMP. 3. Regulations have been adopted and will be included as addendums to the updated drainage regulations.	1. BMP 4.10 addressed permit section 3.2.4.1.3. 2. E&SC plans are required to designate procedures for Construction Site ingress/egress.	1. Continue to use the existing checklist, allowing for revisions as deemed necessary. 2. Document violations and corrections at sites. 3. Determine method to track and document violations and corrective action. 4. Determine how BMP will be evaluated and assessed. 5. Document assessment rational for reporting.	1. Continue to apply checklist to review SWPPP and E/S plans. 2. Coordinate tracking and data recording needs with other SWMP BMPs.

BOARDMAN TOWNSHIP YEAR 2 ANNUAL REPORT
Table 4: Post-Construction Storm Water Minimum Control Measure 5

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
5.1	Workshops for Post-Construction Regulations Note: BMP name change	1. SWCD held multiple site specific workshops and presentations related to Erosion and Sediment Control. 2. Complete updates to Drainage and Sediment and Erosion Control Manual, which included Post-Construction BMP's. Note: Workshops for Year 2 were sediment/Erosion control focused.	1. Significant time and effort by SWCD went into the preparation of the soon to be adopted Mahoning County E&SC Regulations. Note: Year 3- workshops will be modified to accommodate Post-Construction Controls.	1. BMP 5.2 addresses permit section 3.2.5.2.3.3. 2. Construction General Permit.	1. Develop materials and schedule a minimum of 2 workshops focused on Mahoning County's Post-Construction BMP's. 2. Develop schedule to perform reviews and updates of workshop materials. 3. Determine how BMP will be evaluated and assessed. 4. Document assessment rational for reporting. 5. Determine how to track workshop attendance and update workshop materials as necessary.	1. Investigate and identify location or sources that developers, contractors, engineers, builders and public can go to access information on Post-Construction storm water management BMP's.
5.2	Riparian and Wetland Setbacks	1. The model zoning ordinances are expected to be completed during Year 3.	1. Until the various township zoning codes and the building code are amended, the County will continue to encourage development that will maintain or improve water quality.	1. BMP 5.2 addresses permit section 3.2.5.2.3.1	1. Revise the existing zoning ordinances to include the model Riparian zoning ordinances.	1. Revise the existing zoning ordinances to include the model Riparian zoning ordinances.

BOARDMAN TOWNSHIP YEAR 2 ANNUAL REPORT
Table 4: Post-Construction Storm Water Minimum Control Measure 5

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
5.3	<p>Post-Construction Storm Water Management Resolutions- See County table BMP 5.1.</p> <p>Note: By reference this BMP covers BMP's 5.1.1 through 5.1.6 addressed in detail in the county Post-Construction MCM table. (Structural and Non-Structural).</p>	<ol style="list-style-type: none"> 1. Mahoning County Engineers office and Mahoning County Soil and Water Conservation District completed development of <i>Mahoning County Drainage and Sediment Control Manual- Year 2 (2004)</i>. 2. Section 4.4 in the updated Drainage manual addresses this BMP with supporting schematic drawings. 3. County Engineer held a public comment period for the Manual as required by ORC. Comments were incorporated into the manual prior to final edits and presentation to County commissioners. 	<ol style="list-style-type: none"> 1. Post-Construction BMP's will begin to be reviewed and assessed beginning in Year 3. 2. Evaluation of BMP will assist in establishing goals and determining effective BMPs for use in Mahoning County. 	<ol style="list-style-type: none"> 1. BMP 5.1.1 addresses permit sections: <ul style="list-style-type: none"> ✓ 3.2.5.2.4 ✓ 3.2.5.2.4.2 ✓ 3.2.5.2.4.3 2. OEPA Construction General Permit (CGP): <ul style="list-style-type: none"> ✓ Post-Construction Section – Part III.G.2.e 	<ol style="list-style-type: none"> 1. Determine method to track BMPs installed for maintenance purposes. 2. Develop BMP maintenance document. 3. Investigate value in developing a GIS layer to locate these on storm water base map. 4. Investigate and establish BMP measurable goals for reporting and evaluation. 5. Determine evaluation or assessment methods to determine appropriateness. 6. Document evaluation rational for reporting. 	<ol style="list-style-type: none"> 1. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking . 2. Develop and identify BMP maintenance needs and responsible personnel. 3. Consider developing BMP maintenance manual. OEPA SWMP comment recommends minimum inspection frequency of 1x annually. (See BMP 5.3)

BOARDMAN TOWNSHIP YEAR 2 ANNUAL REPORT
Table 4: Post-Construction Storm Water Minimum Control Measure 5

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
5.4	Develop Strategies and Policies to address maintenance of privately owned storm water facilities	<ol style="list-style-type: none"> 1. Identify maintenance standards that are consistent with the Ohio Revised Code. 2. Document number of privately owned/maintained detention/retention facilities 	<ol style="list-style-type: none"> 1. Legal research as related to ORC on townships and private property issues to continue in Year 3. 	<ol style="list-style-type: none"> 1. BMP 5.3 addresses permit section 3.2.3.2.2, 3.2.3.2.3 and 3.2.6.1.4. 2. Continuing legal research concerning township's authority to regulate private storm water facilities. 	<ol style="list-style-type: none"> 1. Adopt the maintenance standards that are consistent with the Ohio Revised Code. 2. Investigate level of effort associated with mapping privately owned storm water management facilities for both water quality purposes and more importantly as a tool to assist with water quantity/flood control management. 3. Develop BMP maintenance form. 4. Outline short and long term strategies for BMP maintenance requirements. 5. Determine facility attributes to obtain during mapping of facilities. 6. Determine how BMP maintenance will be evaluated and assessed. 7. Document assessment rational for reporting. 	<ol style="list-style-type: none"> 1. Implementation is dependent of resolution of legal authority issue. 2. Township will identify (map) all privately (residential/commercial/industrial) owned storm water facilities and develop and implement standards for frequency and required maintenance, along with proper documentation of maintenance. Coordinate tracking and data recording needs with other SWMP BMPs, both at the county and Township levels. 3. Consider developing BMP maintenance manual. OEPA SWMP comment recommends minimum inspection frequency of 1x annually. (See BMP 5.3)

BOARDMAN TOWNSHIP YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 5

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
6.1	<p>Operation and maintenance program to prevent or reduce storm water pollution from community operations.</p>	<p>1. Severe flooding, in May and September 2004, federal disaster assistance was approved for citizens and local governments for Mahoning County. Year 2 – System Mapping was rescheduled for Year 3. The Township will initiate storm sewer system mapping and inventory preparation activities in Year 3- scheduled completion date in permit Year 5.</p>	<p>1. Evaluation has not been achieved for Year 2, but remains a goal in Year 3.</p>	<p>1. BMP 6.1 addresses permit section 3.2.6 through 3.2.6.2.5</p>	<p>1. Draft a Home Rule Resolution for Boardman Township to regulate storm water retention/detention systems. 2. Complete development of operations and maintenance procedures for manual. Target March 2006. 3. Develop O/M training materials. 4. Document number attended, date, topics. 5. Determine how O/M procedures will be evaluated and assessed.</p>	<p>1. To adopt and implement Home Rule Resolution on regulating privately owned retention/detention systems. 2. Review draft Operation and Maintenance procedures related to storm water pollution reduction. 3. Track training completed. 4. Present draft M/O to Township Storm Water Committee. 5. Coordinate program elements which need tracking with County program tracking needs. Determine benefit of leveraging similar tracking requirements. 6. Consider developing BMP maintenance manual. OEPA SWMP comment recommends minimum inspection frequency of 1x annually. (See BMP 5.3)</p>

BOARDMAN TOWNSHIP YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 5

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
6.2	Staff education program on pollution prevention	1. Severe flooding, in May and September 2004, federal disaster assistance was approved for citizens and local governments for Mahoning County. Year 2 – System Mapping was rescheduled for Year 3. The Township will initiate storm sewer system mapping and inventory preparation activities in Year 3- scheduled completion date in permit Year 5.	1. Training remains a goal for Year 2 and Year 3.	1. BMP 6.2 addresses permit section 3.2.6.1.1 and 3.2.6.1.2.	<ol style="list-style-type: none"> 1. Draft outline of education program. 2. Complete review of other training/education models for Township. 3. Identify potential pollution sources/pollution types per maintenance activity to better focus training and O/M practices on. 4. Identify areas/practices/procedures that could be updated and incorporate water quality elements. 5. Develop training schedule and materials based on review of O/M review and focus training on target audience. 6. Determine evaluation or assessment methods to determine BMP appropriateness or effectiveness. 7. Determine methods to track and organize training attendees, when training materials need to be updated and reporting needs. 	<ol style="list-style-type: none"> 1. Present training needs to storm water committee. 2. Outline training materials need and develop schedule to develop, secure and build training program. OEAP SWMP comment- Recommends 1x year to hold training. 3. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking .

BOARDMAN TOWNSHIP YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 5

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
6.3	Street Sweeping	1. Develop method to report quantities collected. Draft sweeping schedule and procedures. Post on county web page schedule.	1. All streets continue to be swept at least once per year. 2. Documents kept by office records.	1. BMP 6.3 addresses permit sections: ✓ 3.2.6.2.1 ✓ 3.2.6.2.3.1 ✓ 3.2.6.2.3.2 ✓ 3.2.6.2.3.3 ✓ 3.2.6.2.3.4 ✓ 3.2.6.2.4 ✓ 3.2.6.2.5	1. Draft sweeping schedule and procedures. Tie protocols/procedures to training being developed in 6.2. Post on county web page schedule. 2. Develop forms to record quantity of street sweepings collected. 3. Determine evaluation or assessment methods to determine BMP appropriateness or effectiveness. 4. Develop system to track and store collected information for reporting purposes.	1. Perform and record street sweeping activities- number of miles, amount collected. 2. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking .
6.4	Litter Pickup	1. Township will continue to work with the Green Team to develop a process of tracking collected litter within the township limits.	1. Year 1 objective still remains a goal in Year 2.	BMP 6.4 addresses permit section 3.2.6.2.3.2	1. Draft procedures to collect and report quantities of trash collected. Develop forms as necessary to track collections. 2. Draft method to track and report. 3. Determine evaluation or assessment methods to determine BMP appropriateness or effectiveness.	1. Township Storm Water Committee will monitor the litter pick-up program within the township. 2. Present process and method to Township Storm Water Committee. Implement BMP. 3. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking .

BOARDMAN TOWNSHIP YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 5

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
6.5	Salt Storage and Applications	1. Salt continues to be stored under roof, allowing no drainage to surface water.	1. Boardman Township. Used 3,000 tons of salt (April to February). 2. Salt continues to be stored in our salt dome. 3. Spills are always reincorporated into salt supply. 4. Minor spills dispersed by driver and/or traffic.	1. BMP 6.5 addresses permit sections: ✓ 3.2.6.2.1 ✓ 3.2.6.2.3.1 ✓ 3.2.6.2.3.2 ✓ 3.2.6.2.3.3 ✓ 3.2.6.2.3.4 ✓ 3.2.6.2.4 ✓ 3.2.6.2.5	1. Develop written clean up procedures. 2. Draft salt storage procedures. 3. Document application procedures and procedures for clean up if excess salt is applied or a salt spill occurs. 4. Track and evaluate the BMP and document effectiveness. 5. Conduct drainage survey of all storage facilities (Salt storage, material storage, by-product storage, spoil storage, liquid storage and secondary containment storage, etc.). 6. Determine how to evaluate/assess modifications and post event clean up activities or procedures.	1. Review of current salt storage not completed due to a lack of time 2. Modify drainage system if necessary. 3. Record total de-icing material used annually. 4. Complete storage facility drainage/outfall inventory. 5. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking .
6.6	Mowing Practices	1. Review in field fueling practices. 2. Began documentation of staff practices related to clean fueling and mowing practices.	1. Procedure developed. 2. Records maintained.	BMP 6.6 addresses permit section 3.2.6.2.3.1	1. Document in field fueling practices and other mowing operations practices with staff before cutting season. 2. Develop method to track personnel provided training. 3. Develop method to evaluate BMP effectiveness for report. 4. Investigate water quality value of modifying current mowing height.	1. Continue to practice clean in field fueling practices and other mowing practices. 2. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking .

BOARDMAN TOWNSHIP YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 5

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
6.7	Storm Water System Maintenance	1. Severe flooding, in May and September 2004, federal disaster assistance was approved for citizens and local governments for Mahoning County. Year 2 – System Mapping was rescheduled for Year 3. The Township will initiate storm sewer system mapping and inventory preparation activities in Year 3-scheduled completion date in permit Year 5.	1. Due to heavy rains not all catch basins were cleaned. 2. Record of all catch basins cleaned is kept on file. 3. Reviewed disposal of collected material.	1. BMP 6.7 addresses permit sections: ✓ 3.2.6.2.1 ✓ 3.2.6.2.3.1 ✓ 3.2.6.2.3.2 ✓ 3.2.6.2.3.3 ✓ 3.2.6.2.3.4 ✓ 3.2.6.2.4 ✓ 3.2.6.2.5	1. Continue the current maintenance schedule. 2. Develop documented procedures and standards for cleaning and disposing of spoil materials. 3. Document current catch basin and ditch maintenance and inspection program and schedule. 4. Develop Checklist to assist with documentation of catch basins cleaned and linear footage of ditches cleaned/maintained. 5. Develop method to evaluate BMP effectiveness for reporting.	1. Continue the current catch basin and ditch maintenance and inspection program. 2. Present draft procedures to TSWC for comment. 3. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking .
6.8	Storage of construction materials and disposal of spoil	1. Continue current practice of storing bulk materials inside or under cover. 2. Township construction debris was properly disposed of in a certified landfill per waste type.	1. Still awaiting funding for covered storage facility.	BMP 6.8 addresses permit section 3.2.6.2.3.3	1. Review current storage practices. 2. Draft storage and disposal procedures or modifications. 3. Develop method to record amount and type of debris disposed of as follows: • Lbs. of soil. • Lbs. of stone. • Lbs. of other. 4. Develop method to track personnel provided training. 5. Develop method to evaluate BMP effectiveness for report.	1. Modify current storage practice of bulk materials based on review. 2. Begin to record amount and type of debris disposed of. 3. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking .

BOARDMAN TOWNSHIP YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 5

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
6.9	Fleet Maintenance	1. Vehicle site maintenance and vehicle washing location drainage reviewed. 2. Vehicle fluid recycling procedures reviewed	1. All road vehicles are washed in wash bay at road facility. 2. Continue to recycle fluids, tires, and batteries.	1. BMP 6.9 addresses permit sections: ✓ 3.2.6.2.1 ✓ 3.2.6.2.3.1 ✓ 3.2.6.2.3.2 ✓ 3.2.6.2.3.3 ✓ 3.2.6.2.3.4 ✓ 3.2.6.2.4 ✓ 3.2.6.2.5	1. Develop vehicle fluid recycling form to begin documentation of amounts of vehicle fluids recycled and disposed of. 2. Draft Inside Trap cleaning frequency and procedures. 3. Track and evaluate BMP and document effectiveness. 4. Draft Fleet vehicle washing procedures and location requirements for performing vehicle washing.	1. Document amount of vehicle fluids recycled and disposed of. 2. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking . 3. Begin documentation of any facility drainage modifications related vehicle washing or floor drain reconnection or relocation.
6.10	Recycling/Separation/Disposal	1. Continue to track and evaluate recycling efforts.	1. Recycling is by County Green Team with in house coordinator. For totals collected please refer to the Mahoning County Annual Report.	1. BMP 6.10 addresses permit sections: ✓ 3.2.6.2.1 ✓ 3.2.6.2.3.1 ✓ 3.2.6.2.3.2 ✓ 3.2.6.2.3.3 ✓ 3.2.6.2.3.4 ✓ 3.2.6.2.4 ✓ 3.2.6.2.5	1. Develop procedures to document collected amounts of: ✓ Oil + Other vehicle fluids ✓ Tires 2. Develop form to assist with tracking and evaluation of BMP effectiveness. 3. Develop method to track and report quantities.	1. Begin to document the quantities of materials recycled/reused/disposed of. 2. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking .

BOARDMAN TOWNSHIP YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 5

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
6.11	Oil and Water Separators	1. Followed manufacturer maintenance recommendations for use, scheduled cleaning and disposal of spoil material.	1. Current maintenance program is documented as effective.	1. BMP 6.11 addresses permit sections: ✓ 3.2.6.2.1 ✓ 3.2.6.2.3.1 ✓ 3.2.6.2.3.2 ✓ 3.2.6.2.3.3 ✓ 3.2.6.2.3.4 ✓ 3.2.6.2.4 ✓ 3.2.6.2.5	1. Develop method and form to track and record frequency of maintenance and amount of spoil removed. 2. Document maintenance procedures for Township Oil/Water separators. 3. Track, evaluate and report number cleaned, lbs. of spoil collected and determine how to assess effectiveness of BMP.	1. Begin to develop maintenance and documentation procedures. 2. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking .
6.12	Spill Management Procedures	1. Review spill management procedures and update as needed.	1. Fire Department had record of: <ul style="list-style-type: none"> • (10) – Gasoline or other flammable liquid spills • (24) – Gas leaks (natural or LPG) • (3) – oil or other combustible liquid spills • (2) – Chemical spills or leaks. 	1. Procedures are through the Mahoning County Hazmat Department and the Fire Department.	1. Continue to review spill management procedures and update as needed. 2. Determine with assistance from Township Fire Department how to document number of Spill responses during permit year? 3. Investigate benefit developing Spill incident storm water system base map? 4. Determine how to evaluate and assess BMP?	1. Continue to use the spill management procedures presently approved by Haz-Mat and Fire and update as needed. 2. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking .

CANFIELD TOWNSHIP YEAR 2 ANNUAL REPORT
Table 1: Public Involvement/Participation Minimum Control Measure 1 & 2

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
1.1	Township Storm Water Management Committee	<ol style="list-style-type: none"> 1. Attend County Storm Water Committee meetings 2. Key Township committee activities: <ul style="list-style-type: none"> • Township Storm Water committee began development schedule for BMP implementation. • Township Storm Water Committee formed in April of 2003. 3. Committee members includes 2 trustees, 1 road supervisor, zoning inspector and a township resident 	<ol style="list-style-type: none"> 1. Severe flooding, in May and September 2004, federal disaster assistance was approved for citizens and local governments for Mahoning County. As a result of these events BMP and plan activity implementation was limited. 	<ol style="list-style-type: none"> 1. BMP 1.1 addresses permit sections 3.2.1.2.3 and 3.2.2.2.3. 	<ol style="list-style-type: none"> 1. Township storm water management committee members will continue to attend County Storm water committee meetings. 2. Township storm water management committee will perform the following activities in Year 3: <ul style="list-style-type: none"> ✓ Develop township BMP implementation schedule. ✓ Develop BMP table and determine responsible personnel for implementation, documentation and maintenance activities associated with BMP's. 4. Determine how Township storm water BMP implementation, maintenance and support activities will tracked, collected and reported. 5. Determine how BMP will be evaluated and assessed. 	<ol style="list-style-type: none"> 1. Present BMP implementation schedule to County Storm Water Committee. 2. Continue to Monitor streams and also take bacterial samples at least 3 times a Year
1.2	Newsletters	<ol style="list-style-type: none"> 1. <u>Mahoning SWCD Education Newsletter</u> – 3 times per year during school year. 2. <u>Mahoning Matters</u>, a quarterly publication of Mahoning SWCD – distributed to 104,686 county residents. 3. <u>Pipeline</u>-published twice a year by County Sanitary Engineer-distributed to 44,000 households. 	<ol style="list-style-type: none"> 1. <u>Mahoning Matters</u> – Title of Article printed in 2004. 2. <u>Pipeline</u>- Title of article printed in 2004. 3. Education Newsletter was distributed 2 times during Year 2 to 2,300 teachers and 300 were placed in the public library 	<ol style="list-style-type: none"> 1. BMP 1.3 addresses permit section 3.2.1.2.5. <p>Due to budget constraints within the county, the SWCD staff hours were reduced. The Education Specialist resigned; consequently, educational programs have been cut dramatically.</p>	<ol style="list-style-type: none"> 1. Assist in drafting information for <u>Mahoning Matters</u> article. 2. One update in the <u>Pipeline</u> per year will continue to be an objective in Year 3. 3. Document number of newsletters published. 	<ol style="list-style-type: none"> 1. Consult with agencies on marketing strategies to inform the public.

CANFIELD TOWNSHIP YEAR 2 ANNUAL REPORT
Table 1: Public Involvement/Participation Minimum Control Measure 1 & 2

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
1.3	Public Meetings	<ol style="list-style-type: none"> 1. Continued working on township version of SWMP. 2. Township Trustee Meetings- Continued to address storm water issues- Year 2. 	<ol style="list-style-type: none"> 1. SWMP was presented at Township Meetings. Most Trustee meetings had drainage issues. All minutes are available as well as road reports on file. 	<ol style="list-style-type: none"> 1. BMP 1.3 addresses permit section 3.2.1.2.4, 3.2.1.2.6 and 3.2.2.2.2. 	<ol style="list-style-type: none"> 1. Complete township trustee SWMP presentation. 2. Continue to encourage public involvement related to storm water issues during Township Trustee meetings 3. Develop a Public involvement plan for citizens to become involved the Townships storm water program. 5. Determine pollutants TSWMC will target. 6. Determine how information for this BMP will be collected, tracked, documented and reported. 7. Determine how BMP will be evaluated and assessed. 	<ol style="list-style-type: none"> 1. Continue to seek public input on the implementation of the SMWP. 2. Present identified target pollutants to Township trustees and coordinate with County storm water committee to align goals and objectives.

CANFIELD TOWNSHIP YEAR 2 ANNUAL REPORT
Table 1: Public Involvement/Participation Minimum Control Measure 1 & 2

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
1.4	Community Activities	1. <u>Green Team</u> a. Cooperative recycling Waste education programs to reduce litter. Summary of collection effort = 17,237 lbs. b. Special Collection Days: Collections: HHW =212,969 lbs. E-Collection =133,483 lbs. Appliance =265,680 lbs. Christmas Tree =93,725 lbs Christmas Wrap & Card =3,155 lbs Household Battery = 1200.	1. <u>Green Team</u> a. Recycling program documented and performed in Year 2. b. Special collection days scheduled and held Year 2	1. <u>Green Team</u> BMP 1.4 address permit sections 3.2.1.2.3, 3.2.1.2.5 and 3.2.2.2.4.	1. Develop efficient means for tracking and reporting recycled materials collected. 2. <u>Green Team</u> a. Continue cooperative recycling and education programs to reduce litter. Record collected amounts. b. Continue Special Collection Days	1. <u>Green Team</u> Estimated 1 Household Hazardous Waste collection, 1 E collection, 1 Appliance collection, 1 Christmas tree collection, 1 Christmas wrap and card collection. 2. Have established a recycling Center at the Maintenance Building within Canfield Township.
1.5	Brochures, Flyers, Factsheets, and Handouts	1. The Township will make available at the Township Hall the following information available from County and other agencies and organizations: a. Handouts with building/zoning permits. b. Mahoning SWCD – <i>Mahoning Matters</i> . c. Mahoning SWCD – Conservation Car Wash Tips. d. Mahoning SWCD- Water Conservation, Why should you care? e. Ohio EPA – Protecting Ohio’s water. f. OSU Extension Fact Sheets related to Storm Water. g. Map of County watersheds and regulated areas.	1. Established articles in the Town Crier. The Crier & Vindicator reported on meetings, drainage issues and proposed projects. 2. Township Storm Water Committee continued working with Mahoning County Storm water committee to develop/collect information for County and Township use.	1. BMP 1.5 address permit sections 3.2.1.2.3, 3.2.1.2.5 and 3.2.2.2.4.	1. Continue working with County Storm water committee to develop and contribute information to the following: <ul style="list-style-type: none"> • <i>Mahoning Matters</i> • Mahoning County Green Team 2. Investigate developing Township focused storm water brochure/factsheet. 3. Determine how BMP will be evaluated and assessed. 4. Document assessment rational for reporting.	1. Establish Quarterly Articles and community news letters. 2. Determine tracking and documenting procedures. 3. Continue to review and assess storm water program information received and update and make available to public at zoning office and town hall. 4. Determine tracking and documenting procedures. 5. Coordinate tracking and data recording needs with other SWMP BMPs.

CANFIELD TOWNSHIP YEAR 2 ANNUAL REPORT
Table 1: Public Involvement/Participation Minimum Control Measure 1 & 2

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
1.6	Website	<ol style="list-style-type: none"> 1. Began website development during Year 2. 2. Severe flooding, in May and September 2004, federal disaster assistance was approved for citizens and local governments for Mahoning County. As a result of these events BMP and plan activity implementation was limited. 	<ol style="list-style-type: none"> 1. Complete web page development. 	<ol style="list-style-type: none"> 1. BMP 1.6 addresses permit section 3.2.1.5.2 	<ol style="list-style-type: none"> 1. Complete development of web page. 2. Determine method to collect and post township storm water information on page. 3. Determine how to track, evaluate, assess and document BMP appropriateness. 4. Determine how to archive web page materials. 	<ol style="list-style-type: none"> 1. Activate web page. 2. Provide additional water quality links and materials on page. 3. Determine and document schedule for updating web page materials.
1.7	Storm Water Education Campaign	<ol style="list-style-type: none"> 1. Check and coordinate with soil and Water CD to obtain existing water quality/storm water educational materials in Year 2. 2. Severe flooding, in May and September 2004, federal disaster assistance was approved for citizens and local governments for Mahoning County. As a result of these events BMP and plan activity implementation was limited. 	<ol style="list-style-type: none"> 1. Coordination and scheduling completed early in Year 2. 	<ol style="list-style-type: none"> 1. BMP 1.7 addresses permit section 3.2.1.2.2. 	<ol style="list-style-type: none"> 1. Complete development of township storm water management educational presentation schedule. 2. Determine means to track presentation topics and attendees. 3. Develop process to review and update educational material. 3. Determine how to track, evaluate, assess and document BMP appropriateness. 4. Determine how to archive web page materials. 	<ol style="list-style-type: none"> 1. Coordinate educational presentation programs. 2. Document date, time and topics. 3. Coordinate tracking and data recording needs with other SWMP BMPs.

CANFIELD TOWNSHIP YEAR 2 ANNUAL REPORT

Table 2: Illicit Discharge Detection and Elimination Plan Minimum Control Measure 3

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
3.1	Map storm sewer system	<ol style="list-style-type: none"> 1. Severe flooding, in May and September 2004, federal disaster assistance was approved for citizens and local governments for Mahoning County. Year 2 – System Mapping was rescheduled for Year 3. Mahoning County is considering several protocols for inventory along with the attributes collected. 2. Township will initiate storm sewer mapping activities in Year 3. 3. Township to coordinate storm sewer inventory with County inventory to standardized system attribute collection. 	<ol style="list-style-type: none"> 1. Severe flooding, in May and September 2004, federal disaster assistance was approved for citizens and local governments for Mahoning County. Year 2 – System Mapping was rescheduled for Year 3. 	<ol style="list-style-type: none"> 1. BMP will address permit section 3.2.3.1.2 and 3.2.3.2.1 2. BMP Assessment here will be based on percent complete per year between Year 3 and Year 4. 	<ol style="list-style-type: none"> 1. Outline System inventory approach/sequence and schedule for system outfalls and Home Sewer Treatment System (HSTS) outfalls. Coordinate HSTS inventory with District Board of Health and Mahoning County Engineers office. 2. Develop inventory protocols. 3. Determine how and where outfall inventory will be stored or filed. 4. Determine how inventory data will be linked with County- GIS mapping to create "Storm Sewer Base Map". 5. Determine system attributes to be collected. 6. Consider including "Simple" dry weather screening activities (Color, odor, presence of flow) which can be easily performed during inventory as a method to begin identification of potential illicit discharge locations. 	<ol style="list-style-type: none"> 1. Begin inventory. 2. Complete base map for use in inventory. 3. Document process (Protocol). 4. Draft revised completion schedule. 5. Address the Dry weather screening issue.

CANFIELD TOWNSHIP YEAR 2 ANNUAL REPORT
Table 2: Illicit Discharge Detection and Elimination Plan Minimum Control Measure 3

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
3.2	Develop program to detect and eliminate illicit discharges	1. Severe flooding, in May and September 2004, federal disaster assistance was approved for citizens and local governments for Mahoning County. Year 2 – System Mapping was rescheduled for Year 3. The Township will initiate storm sewer system mapping and inventory preparation activities in Year 3- scheduled completion date in permit Year 5.	1. Severe flooding, in May and September 2004, federal disaster assistance was approved for citizens and local governments for Mahoning County. Year 2 – System Mapping was rescheduled for Year 3. The Township will initiate storm sewer system mapping and inventory preparation activities in Year 3- scheduled completion date in permit Year 5.	1. BMP 3.2 addresses permit sections: <ul style="list-style-type: none"> ✓ 3.2.3.1.3 ✓ 3.2.3.1.4 ✓ 3.2.3.1.5 ✓ 3.2.3.2.2 ✓ 3.2.3.2.3 ✓ 3.2.3.2.4 ✓ 3.2.3.2.4.1 ✓ 3.2.3.2.4.2 ✓ 3.2.3.2.4.3 ✓ 3.2.3.2.4.4 2. Wastewater discharges that are identified during any inspection are required to be corrected to comply with Section 2 part C,D,E,F, & G of the Regulation of Household Sewage Disposal Systems. 3. Off-lot discharges are permitted for wastewater when an on-lot system can not be installed and the off-lot system is installed to comply with the Regulations of Household Sewage Disposal Systems Section 2 part G.	1. Begin development of Illicit Discharge Ordinance. Outline suggested enforcement procedures. (3.2.3.1.3 and 3.2.3.2.3). Develop draft schedule for implementation. 2. Develop preliminary Illicit Discharge Elimination Plan (IDEP). Plan should include procedures for detection and process for removal and reporting. IDEP should include schedule and implementation steps. (3.2.3.1.4, 3.2.3.2.2, 3.2.3.2.4) 3. Develop IDEP program factsheet for public and employee use. (3.2.3.1.5) 4. Develop preliminary Dry Weather Screening plan. Plan. (3.2.3.2.4.1 and 3.2.3.2.4.2). . Process for prioritizing “Hot Spot” areas. 6. Develop general procedures for removing identified illicit discharges. 7. Develop BMP evaluation/assessment criteria or procedures. Document status for annual report in Year 3. 7. Determine storage/file location of collected IDEP information/elimination data/follow up action- required or taken. 8. Determine how BMP will be evaluated and assessed. 9. Document assessment rational for reporting.	1. Work with County engineer and Township Trustees to complete and obtain approval of Illicit Discharge Ordinance/regulation. 2. Work with County Sanitary Engineer, District Board of Health, Townships and Mill Creek Metroparks to draft both Illicit Discharge Ordinance language and to outline the IDEP program for the County 3. Determine the following: <ul style="list-style-type: none"> ✓ Champion for IDEP program. ✓ Where IDEP will be filed and how will data be linked with County GIS. ✓ Determine whether the Dry Weather Screening will be performed during inventories. ✓ Complete schedule ✓ OEPA recommended 100 % dry weather screening be completed between Year 3 and Year 5. ✓ Draft NOV form. ✓ Evaluation process.

CANFIELD TOWNSHIP YEAR 2 ANNUAL REPORT
Table 2: Illicit Discharge Detection and Elimination Plan Minimum Control Measure 3

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
3.3	Adopt resolutions prohibiting illicit discharges	1. Began Ohio Revised Code (ORC) and Township authority research related to County authority to implement regulations related to illicit discharge.	1. Based on research results. Regulation/ordinance should include or address the following: <ul style="list-style-type: none"> ✓ Prohibition of Illicit discharges and illegal dumping. ✓ Enforcement ✓ Private property access for investigative purposes to determine illicit source. First offense warning- NOV.	1. See BMP 3.2 for permit sections.	1. Complete review/research. See BMP 3.2 for sequence details. 2. Prepare draft Illicit Discharge regulation including: <ul style="list-style-type: none"> ✓ Prohibition of Illicit discharges and illegal dumping. ✓ Enforcement ✓ Private property access for investigative purposes to determine illicit source. ✓ First offense warning- NOV. 3. Determine how BMP will be evaluated and assessed. 4. Document assessment rational for reporting.	1. Present Draft Illicit Discharge regulation to Township Storm water committee for review and comment. 2. Revise regulation based on comments. 3. Schedule meeting with Township Trustees to present draft regulation. 4. Follow through regulation adoption process to achieve passage of draft regulation(s).

CANFIELD TOWNSHIP YEAR 2 ANNUAL REPORT
Table 2: Illicit Discharge Detection and Elimination Plan Minimum Control Measure 3

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
3.4	<p>Total Maximum Daily Load (TMDL) (Ohio EPA Permit Section 1.3.6) County and Township procedures should be able to demonstrate how they determined the amount of pollutant needed to be reduced within the impaired stream segment(s), and how much pollutant was reduced (i.e., water sampling to verify the amounts removed).</p>	<ol style="list-style-type: none"> 1. Table completed identifying Approved and pending TMDLs within Ohio. 2. Preliminary Mahoning County map developed showing proposed TMDL's. Map identifies regulated MS4 permit boundaries and overlays this information onto TMDL delineated watersheds. 	<ol style="list-style-type: none"> 1. The County's consultant currently has a system in place to identify the TMDL watersheds located throughout the county. 2. Began development of regulated areas which overlay on top of TMDL watershed. Table includes approved and pending approval TMDLs only. 	<ol style="list-style-type: none"> 1. BMP 3.5 addresses permit section 1.3.6. 2. OEPA Construction General Permit. 	<ol style="list-style-type: none"> 1. Provide information/assistance for Mahoning County to complete TMDL layer development for the storm water Base Map. 2. Provide assistance to assist Mahoning County with completing TMDL table. Table will include the following: <ul style="list-style-type: none"> ✓ TMDL HUC code and stream name. ✓ General Description of location. ✓ Summary of causes and sources. 3. Investigate and document Township potential sources as identified in TMDL. 4. Document all assumptions made during potential source assessments. 5. Assist through Township Storm Water Management Committee with drafting outline of process to be developed in Year 5 of permit term which preliminary procedures to be implemented to address identified sources on a planning and project basis. 6. Determine how BMP will be evaluated and assessed. 7. Document assessment rational for reporting. 	<ol style="list-style-type: none"> 1. Present map and table to Township storm water management committee and Township Trustees for review and comment. 2. Review updated Mahoning County Drainage Manual for potential edits based on completed mapping and tables.

CANFIELD TOWNSHIP YEAR 2 ANNUAL REPORT

Table 3: Construction Site Storm Water Control Plan Minimum Control Measure 4

ID	Best Management Practice	Permit Year 2004 Year 2 Objective	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
4.1	Adopt erosion and sediment control zoning resolutions	1. Mahoning County Engineers office and Mahoning County Soil and Water Conservation District completed development of <i>Mahoning County Drainage and Sediment Control Manual- Year 2 (2004)</i> . Manual includes: <ul style="list-style-type: none"> ✓ Drainage Design and Engineering ✓ Storm Drainage Systems ✓ Post-Construction Storm Water Management Requirements ✓ Storm Water Pollution Prevention plans and Erosion and sediment Control Requirements ✓ Current Flood Plain Regulations. 	1. Mahoning County has developed E&SC Regulations. The E&SC Regulations are included in the revised and updated <i>Mahoning County Drainage and Sediment Control Manual</i> . 2. Resolution from the Mahoning County Commissioners adopting the revised/updated Drainage Criteria and Erosion & Sediment Control Manual will be in place spring 2005.	1. BMP 4.1 Addresses permit sections: <ul style="list-style-type: none"> ✓ 3.2.4.1.1 ✓ 3.2.4.1.2 ✓ 3.2.4.1.3 ✓ 3.2.4.1.4 ✓ 3.2.4.1.6 ✓ 3.2.4.2.1 ✓ 3.2.4.2.2 ✓ 3.2.4.2.3 2. OEPA Construction General Permit (CGP).	1. Review current Township regulations/resolutions governing Erosion and Sediment Control. 2. Determine necessary modifications to current resolution/regulation in order to adopt <i>Mahoning County Drainage and Erosion and Sediment Control Manual</i> as the Township design manual. 3. Identify potential areas of Manual which from the Township perspective may need to be updated to fit Township requirements. 4. Implement the new requirements contained within the revised/updated Drainage Criteria and Erosion & Sediment Control Manual. 5. Develop necessary support forms, checklists to aid in plan review. 6. Determine how BMP will be evaluated and assessed. 7. Document assessment rational for reporting.	1. Mahoning County will provide updates/revisions to the Manual periodically based on reviews of actual Manual concepts implemented in the field. 2. Mahoning County will consider Manual user suggestions and feedback on improving Manual content and applicability. 3. Support Mahoning County in conducting Manual workshops.

CANFIELD TOWNSHIP YEAR 2 ANNUAL REPORT

Table 3: Construction Site Storm Water Control Plan Minimum Control Measure 4

ID	Best Management Practice	Permit Year 2004 Year 2 Objective	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
4.2	Workshop on E&SC Resolutions:	1. SWCD held multiple site specific workshops and presentations related to Erosion and Sediment Control.	1. On-site workshops were conducted as contractors and builders had questions relating to ESC practices arose during construction. 2. Significant time and effort by SWCD went into the preparation of the soon to be adopted Mahoning County E&SC Regulations.	1. See BMP 4.1 for permit sections.	1. 2 – Half-day workshops will be scheduled in connection with how to use the updated manual. 2. TSWMC will develop and provide an estimated 2 workshops on erosion and sediment control BMPs in Year 3. Content includes - How to comply with the revised resolutions and how to use the updated manual? 3. Assist County SWMC with developing County and Township relevant Storm water fact sheets. 4. Develop method to track and document workshop attendance. 5. Develop a schedule for completing workshop material and also a schedule for updating workshop materials.	1. Publish workshop on web page. 2. Complete workshop material development.
4.3	Enter into Memorandum of Understanding (MOU) with Mahoning SWCD	1. MOU Review and update completed in Year 2. 2. Mahoning County SWCD will continue to provide site plan review and Site erosion control inspection. 3. MOU provides guidance in delegating SWCD services in relation to Mahoning County Storm Water Plan Compliance.	1. MOU developed and signed between SWCD and the Mahoning County Engineer's Office, outlining cooperative duties/services provided by each entity.	1. BMP 4.3 addresses permit sections 3.2.4.2.2 and 3.2.4.3.4.	1. Review MOU language and update as necessary throughout Year 3. 2. Consider alternative/backup based on SWCD availability in years 3- 5 of the permit.	1. Document MOU changes as necessary.

CANFIELD TOWNSHIP YEAR 2 ANNUAL REPORT

Table 3: Construction Site Storm Water Control Plan Minimum Control Measure 4

ID	Best Management Practice	Permit Year 2004 Year 2 Objective	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
4.4	<p>Review Erosion & Sediment Control plans/Storm Water Pollution Prevention Plans (SWPPP)</p> <p>Note: BMP name change.</p>	<ol style="list-style-type: none"> 1. Develop Method to track and document number reviewed. Place review checklist on webpage as PDF. 2. Current plan process: <ul style="list-style-type: none"> ✓ Townships review site plans. ✓ Engineer reviews site plans (Springfield Twp.). ✓ SWCD reviews SWPPP and Erosion and Sediment Control plans. 	<ol style="list-style-type: none"> 1. SWCD reviews residential (sub-division) and other projects requiring submission of E/S plans. The updated manual did not change the plan review process. 2. Continue to work with County Engineer, SWCD and Building Departments to provide support for site erosion/sediment reviews. 	<ol style="list-style-type: none"> 1. BMP 4.4 addresses permit section 3.2.4.1.4. 	<ol style="list-style-type: none"> 1. Canfield Township will adopt the Erosion and Sediment Control regulations contained within the <i>Mahoning County Drainage and Erosion and Sediment Control Manual</i>. 2. SWCD will work with Mahoning County Engineers office to update website with E&SC Requirements (including checklists). 3. Zoning Inspectors will be cross-trained to review site plans associated with E&SC. Currently, review is provided for building zones and building setbacks. 4. Develop Method to track and document number reviewed. 6. Determine how BMP will be evaluated and assessed. 7. Document assessment rational for reporting. 	<ol style="list-style-type: none"> 1. Track number of plans reviewed for E/S controls. 2. Document date E/S checklist placed on web page. 3. Document Township adoption of E&SC Regulations. 4. Coordinate program elements which need tracking with County program tracking needs. Determine benefit of leveraging similar tracking requirements.

CANFIELD TOWNSHIP YEAR 2 ANNUAL REPORT

Table 3: Construction Site Storm Water Control Plan Minimum Control Measure 4

ID	Best Management Practice	Permit Year 2004 Year 2 Objective	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
4.5	Construction debris collection and disposal	1. SWCD ES&C plan checklist includes Construction Debris Collection and Disposal.	1. Erosion and Sediment Control site inspection checklist was modified in Year 2 to include Construction debris and disposal. 2. Year 3- will focus on investigating methods to collect and document volumes of Construction debris removed and disposed of properly.	1. BMP 4.5 addresses permit section 3.2.4.2.3.	1. Develop method to track sites with collection control in place. Review current zoning language, modify if necessary. 2. Develop appropriate site locations for placing containers. 3. Develop disposal procedures, frequency of pick up and potential secondary containment requirements. 4. Draft resolutions which will allow for enforcement of non-compliance. 5. Determine how BMP will be evaluated and assessed. 6. Document assessment rational for reporting.	1. SWCD to continue to inspect/evaluate active construction sites, using county enforcement abilities as they are developed. 2. SWCD will track inspections with Urban Site Program (ACCESS database). 3. Using Urban Site Program method to track sites and document violations. Collect quantitative information on volumes and number of violations and corrections for reporting.
4.6	Inspect active sites: SWCD will continue to inspect active construction sites.	1. SWCD – continued with current construction site inspection program. 2. Began implementation Urban Site Program Database tracking system.	1. Active construction sites are inspected/evaluated against compliance conditions set forth in OEPA's Construction General Permit. 2. Inspections are tracked with Urban Site Program (ACCESS database).	1. BMP 4.5 addresses permit section 3.2.4.1.6 2. Inspections provided local impetus for compliance with terms of NPDES/Construction storm water permit.	1. SWCD – continue with current construction site inspection program. 2. Develop method to collect and present data from Urban site Program for reporting purposes. 3. Determine data presentation format. 4. Determine Inspection frequency/schedule. OEPA SWMP comment indicated minimum of once per month. 4. Determine how BMP will be evaluated and assessed. 5. Document assessment rational for reporting	1. Report out data from Urban Site Program. Number of sites. 2. Summary of recurring violations. 3. Modify E/S controls if necessary to reduce recurring inspection noted deficiencies.

CANFIELD TOWNSHIP YEAR 2 ANNUAL REPORT

Table 3: Construction Site Storm Water Control Plan Minimum Control Measure 4

ID	Best Management Practice	Permit Year 2004 Year 2 Objective	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
4.7	Enforcement actions	<p>Canfield Township will adopt <i>Mahoning County Drainage and Erosion and Sediment Control Manual</i>, by adopting the manual the following applies:</p> <ol style="list-style-type: none"> 1. Mahoning County Engineers office and Mahoning County Soil and Water Conservation District completed development of <i>Mahoning County Drainage Erosion and Sediment Control Manual- Year 2 (2004)</i>. 2. Reviewed other County-E/S enforcement requirements/ regulations during development of the updated manual. 3. Notice of Violation form implemented to notify developers/contractors of major non-compliances. 	<ol style="list-style-type: none"> 1. Review and track enabling legislation for additional enforcement as passed by the State Legislature. 2. Mahoning County E&S Regulations will be amended as legislation continues to change. 	<ol style="list-style-type: none"> 1. BMP addresses permit section 3.2.4.2.6 2. Commissioners will be urged to adopt a resolution allowing the use HB 411 to enable County to enforce regulations. 	<ol style="list-style-type: none"> 1. Implement new requirements contained in the updated Drainage and Sediment and Erosion Control Manual. 2. Determine fee structure for NOV and re-inspection fee. Re-inspection fees after 3 consecutive NOVs will be implemented. 3. Determine method to track, record and document Inspections and enforcement actions taken. 4. Determine how BMP will be evaluated and assessed. 5. Document assessment rational for reporting. 6. Develop method/enforcement mechanism that zoning inspector can issue stop work order. Coordinate with County prosecutor as necessary. 	<ol style="list-style-type: none"> 1. Mahoning County will provide updates/revisions to the Manual periodically based on reviews of actual Manual concepts implemented in the field. 2. Mahoning County will consider Manual user suggestions and feedback on improving Manual content and applicability.
4.8	Respond to public complaints regarding construction activities	<ol style="list-style-type: none"> 1. Began process of establishing a contact number for public feedback/complaints. 2. Current system in place under Year 2 – Direct complaints to SWCD. 	<ol style="list-style-type: none"> 1. Current mechanism in place is to direct complaints through SWCD. 	<ol style="list-style-type: none"> 1. BMP 4.7 addresses permit section 3.2.4.2.5. 	<ol style="list-style-type: none"> 1. Develop and publish call in number for water quality, construction site pollution complaints. 2. Develop method to track and document complaints. 3. Tracking will allow for follow up and documentation of complaint resolution. 4. Determine how BMP will be evaluated and assessed. 5. Document assessment rational for reporting. 6. Canfield Township will advertise through newsletter and web site, a phone number for residents concerned about specific construction activities 	<ol style="list-style-type: none"> 1. Establish call in number. 2. Determine tracking and documenting procedures.

CANFIELD TOWNSHIP YEAR 2 ANNUAL REPORT

Table 3: Construction Site Storm Water Control Plan Minimum Control Measure 4

ID	Best Management Practice	Permit Year 2004 Year 2 Objective	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
4.9	Concrete Truck Wash Out	1. Concrete Truck Wash Out procedures and locations were identified in the updated drainage and erosion and sediment control manual.	1. Checklist developed includes requirements for concrete truck wash-out. 3. Regulations have been adopted and will be included as addendums to the updated drainage regulations.	1. BMP 4.9 addressed permit section 3.2.4.1.3. 2. E&SC plans are required to designate procedures for concrete truck wash-out.	1. Continue to use the existing checklist, allowing for revisions as deemed necessary. 2. Document violations and corrections at sites. 3. Determine method to track and document violations and corrective action. 4. Determine how BMP will be evaluated and assessed. 5. Document assessment rational for reporting.	1. Continue to apply checklist to review SWPPP and E/S plans. 2. Coordinate tracking and data recording needs with other SWMP BMPs.
4.10	Construction Site Ingress/Egress	1. Ingress/Egress BMP procedures were addressed in the updated drainage and erosion and sedimentation control manual.	1. Checklist developed includes requirements for site ingress/egress protection. 2. Regulations have been adopted and will be included as addendums to the updated drainage regulations. 3. Regulations have been adopted and will be included as addendums to the updated drainage regulations.	1. BMP 4.10 addressed permit section 3.2.4.1.3. 2. E&SC plans are required to designate procedures for Construction Site ingress/egress.	1. Continue to use the existing checklist, allowing for revisions as deemed necessary. 2. Document violations and corrections at sites. 3. Determine method to track and document violations and corrective action. 4. Determine how BMP will be evaluated and assessed. 5. Document assessment rational for reporting.	1. Continue to apply checklist to review SWPPP and E/S plans. 2. Coordinate tracking and data recording needs with other SWMP BMPs.

CANFIELD TOWNSHIP YEAR 2 ANNUAL REPORT
Table 4: Post-Construction Storm Water Minimum Control Measure 5

ID	Best Management Practice	Permit Year 2004 Year 2 Objective	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
5.1	Workshops for Post-Construction Regulations Note: BMP name change	1. SWCD held multiple site specific workshops and presentations related to Erosion and Sediment Control. 2. 2 – Half-day workshops will be scheduled in connection with how to use the updated manual. 3. Complete updates to Drainage and Sediment and Erosion Control Manual, which included Post-Construction BMP's. Note: Workshops for Year 2 were sediment/Erosion control focused.	1. SWCD provided numerous brief, audience-specific workshops/presentations on E&SC as requested during Year 2. 2. Significant time and effort by SWCD went into the preparation of the soon to be adopted Mahoning County E&SC Regulations. Note: Year 3- workshops will be modified to accommodate Post-Construction Controls.	1. BMP 5.2 addresses permit section 3.2.5.2.3.3. 2. Construction General Permit.	1. Develop materials and schedule a minimum of 2 workshops focused on Mahoning County's Post-Construction BMP's. 2. Develop schedule to perform reviews and updates of workshop materials. 3. Determine how BMP will be evaluated and assessed. 4. Document assessment rational for reporting. 5. Determine how to track workshop attendance and update workshop materials as necessary.	1. SWCD will provide at least two workshops as requested/needed and annually following adoption of updated E &SC regulations. Record time, date, location and number of attendees.
5.2	Post-Construction Storm Water Management Resolutions- See County table BMP 5.1. Note: By reference this BMP covers BMP's 5.1.1 through 5.1.6 addressed in detail in the county Post-Construction MCM table. (Structural and Non-Structural).	1. Mahoning County Engineers office and Mahoning County Soil and Water Conservation District completed development of <i>Mahoning County Drainage and Sediment Control Manual- Year 2 (2004)</i> . 2. Section 4.4 in the updated Drainage manual addresses this BMP with supporting schematic drawings. 3. County Engineer held a public comment period for the Manual as required by ORC. Comments were incorporated into the manual prior to final edits and presentation to County commissioners.	1. The model zoning ordinances are expected to be completed during Year 3. 2. Post-Construction BMP's will begin to be reviewed and assessed beginning in Year 3. 3. Evaluation of BMP will assist in establishing goals and determining effective BMPs for use in Mahoning County.	1. BMP 5.1.1 addresses permit sections: ✓ 3.2.5.2.4 ✓ 3.2.5.2.4.2 ✓ 3.2.5.2.4.3 2. OEPA Construction General Permit (CGP): ✓ Post-Construction Section – Part III.G.2.e	1. Determine method to track BMPs installed for maintenance purposes. 2. Develop BMP maintenance document. 3. Investigate value in developing a GIS layer to locate these on storm water base map. 4. Investigate and establish BMP measurable goals for reporting and evaluation. 5. Determine evaluation or assessment methods to determine appropriateness. 6. Document evaluation rational for reporting.	1. Revise the existing zoning ordinances to include the model zoning ordinances. 2. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking . 3. Develop and identify BMP maintenance needs and responsible personnel. 4. Consider developing BMP maintenance manual. OEPA SWMP comment recommends minimum inspection frequency of 1x annually. (See BMP 5.3)

CANFIELD TOWNSHIP YEAR 2 ANNUAL REPORT
Table 4: Post-Construction Storm Water Minimum Control Measure 5

ID	Best Management Practice	Permit Year 2004 Year 2 Objective	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
5.3	Develop Strategies and Policies to address maintenance of privately owned storm water facilities	1. Canfield Township discussed with County Engineer and County Prosecutor issues related to township authority to require maintenance or maintain private storm water management facilities (residential and commercial) in Year 2.	1. Discussion initiated to begin drafting potential resolution addressing maintenance of residential and commercial storm water management facilities.	1. BMP 5.3 addresses permit section 3.2.3.2.2, 3.2.3.2.3 and 3.2.6.1.4. 2. Continuing legal research concerning township's authority to regulate private storm water facilities.	1. Continue researching and documenting legal authority associated with Townships ability to require maintenance be preformed on Storm Water Management facilities. 2. Investigate Adopting maintenance standards that would be consistent with the Ohio Revised Code. 3. Investigate level of effort associated with mapping privately owned storm water management facilities for both water quality purposes and more importantly as a tool to assist with water quantity/flood control management. 4. Develop BMP maintenance form. 5. Outline short and long term strategies for BMP maintenance requirements. 6. Determine facility attributes to obtain during mapping of facilities. 7. Determine how BMP maintenance will be evaluated and assessed. 8. Document assessment rational for reporting.	1. Implementation is dependent of resolution of legal authority issue. 2. Township will identify (map) all privately (residential/commercial/industrial) owned storm water facilities and develop and implement standards for frequency and required maintenance, along with proper documentation of maintenance. Coordinate tracking and data recording needs with other SWMP BMPs, both at the county and Township levels. 3. Consider developing BMP maintenance manual. OEPA SWMP comment recommends minimum inspection frequency of 1x annually. (See BMP 5.3)

CANFIELD TOWNSHIP YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 6

ID	Best Management Practice	Permit Year 2004 Year 2 Objective	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
6.1	Operation and maintenance program to prevent or reduce storm water pollution from community operations.	1. Completed identification of community operations which will be incorporated into the <i>Storm water BMP Operations and Maintenance Manual</i> .	1. Target date for completion of <i>Storm Water BMP Operations and Maintenance Manual</i> by November 15, 2005.	1. BMP 6.1 addresses permit section 3.2.6 through 3.2.6.2.5	1. Complete development of operations and maintenance procedures for manual. 2. Road Superintendent to continue conducting quarterly training on storm water O&M procedures and reporting. 3. Develop O/M training materials. 4. Document number attended, date, topics. 5. Determine how O/M procedures will be evaluated and assessed. 6. Document assessment rational for reporting.	1. Begin to implement completed Operation and Maintenance procedures related to storm water pollution reduction. 2. Determine how to collect and record information for reporting purposes. 3. Coordinate program elements which need tracking with County program tracking needs. Determine benefit of leveraging similar tracking requirements. 4. Consider developing BMP maintenance manual. OEPA SWMP comment recommends minimum inspection frequency of 1x annually. (See BMP 5.3)

CANFIELD TOWNSHIP YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 6

ID	Best Management Practice	Permit Year 2004 Year 2 Objective	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
6.2	Staff education program on pollution prevention	<ol style="list-style-type: none"> Completed review of potential training and education materials in Year 2. Started notebook recording system and held employee meeting about pollution and recording 	<ol style="list-style-type: none"> Received education in Sediment control from SWCD and health issues with Mahoning Board of Health 	<ol style="list-style-type: none"> BMP 6.2 addresses permit section 3.2.6.1.1 and 3.2.6.1.2. 	<ol style="list-style-type: none"> Identify potential pollution sources/pollution types per maintenance activity to better focus training and O/M practices on. Identify areas/practices/procedures that could be updated and incorporate water quality elements. Develop training schedule and materials based on review of O/M review and focus training on target audience. Determine evaluation or assessment methods to determine BMP appropriateness or effectiveness. Determine methods to track and organize training attendees, when training materials need to be updated and reporting needs. 	<ol style="list-style-type: none"> Present training needs to storm water committee. Outline training materials need and develop schedule to develop, secure and build training program. OEAP SWMP comment- Recommends 1x year to hold training. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking .
6.3	Street Sweeping	<ol style="list-style-type: none"> Discussed method of reporting street sweepings collected. Sweeping schedule drafted. 	<ol style="list-style-type: none"> Performed street swept on every township street in Year 2. 	<ol style="list-style-type: none"> BMP 6.3 addresses permit sections: <ul style="list-style-type: none"> ✓ 3.2.6.2.1 ✓ 3.2.6.2.3.1 ✓ 3.2.6.2.3.2 ✓ 3.2.6.2.3.3 ✓ 3.2.6.2.3.4 ✓ 3.2.6.2.4 ✓ 3.2.6.2.5 	<ol style="list-style-type: none"> Draft sweeping schedule and procedures. Tie protocols/procedures to training being developed in 6.2. Post on county web page schedule. Develop forms to record quantity of street sweepings collected. Determine evaluation or assessment methods to determine BMP appropriateness or effectiveness. Develop system to track and store collected information for reporting purposes. 	<ol style="list-style-type: none"> Perform and record street sweeping activities- number of miles, amount collected. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking .

CANFIELD TOWNSHIP YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 6

ID	Best Management Practice	Permit Year 2004 Year 2 Objective	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
6.4	Litter Pickup	<ol style="list-style-type: none"> Continue to develop a process to identify areas where trash collected. Begin to track, evaluate, and modify BMP as necessary. Document effectiveness. 	<ol style="list-style-type: none"> Began to develop a process to track litter collected and to identify areas where litter has been collected. Green Team provided Community Corrections people for litter cleanup. They have records. 	BMP 6.4 addresses permit section 3.2.6.2.3.2	<ol style="list-style-type: none"> Draft procedures to collect and report quantities of trash collected. Develop forms as necessary to track collections. Draft method to track and report. Determine evaluation or assessment methods to determine BMP appropriateness or effectiveness. 	<ol style="list-style-type: none"> Hold or coordinate litter pickup(s) and document amounts collected. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking .
6.5	Salt Storage and Applications	<ol style="list-style-type: none"> Salt drainage system and cleanup procedures were reviewed. Reviewed current site drainage at Township storage facilities. Drainage from reviewed salt storage areas is compliant. 	<ol style="list-style-type: none"> De-icing materials are stored under cover (salt domes and salt sheds) in a manner that minimizes commingling with surface runoff. 	<ol style="list-style-type: none"> BMP 6.5 addresses permit sections: <ul style="list-style-type: none"> ✓ 3.2.6.2.1 ✓ 3.2.6.2.3.1 ✓ 3.2.6.2.3.2 ✓ 3.2.6.2.3.3 ✓ 3.2.6.2.3.4 ✓ 3.2.6.2.4 ✓ 3.2.6.2.5 	<ol style="list-style-type: none"> Develop written clean up procedures. Draft salt storage procedures. Document application procedures and for excess salt clean up applied during event or a salt spill occurs. Track and evaluate the BMP and document effectiveness. Determine how to evaluate/assess modifications and post event clean up activities or procedures. 	<ol style="list-style-type: none"> Modify drainage system if necessary. Implement developed and documented clean up procedures, salt storage procedures and application procedures. Record total de-icing material used annually. Complete storage facility drainage/outfall inventory. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking .
6.6	Mowing Practices	<ol style="list-style-type: none"> Review in field fueling practices. Began documentation of staff practices related to clean fueling and mowing practices. 	<ol style="list-style-type: none"> Review completed in Year 2. 	BMP 6.6 addresses permit section 3.2.6.2.3.1	<ol style="list-style-type: none"> Eliminate in field fueling practices. Implement any revised mowing procedures. Track and evaluate the BMP and document effectiveness for report. Develop method to evaluate BMP effectiveness for report. Investigate water quality value of modifying current mowing height. 	<ol style="list-style-type: none"> Continue to track and evaluate the BMP and document effectiveness for report. Time books document when mowing occurred. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking

CANFIELD TOWNSHIP YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 6

ID	Best Management Practice	Permit Year 2004 Year 2 Objective	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
6.7	Storm Water System Maintenance	1. Continue the current maintenance schedule. 2. Develop written procedures and standards.	1. Performed and recorded in booklet. 2. Determine how to record total in Year 3.	1. BMP 6.7 addresses permit sections: ✓ 3.2.6.2.1 ✓ 3.2.6.2.3.1 ✓ 3.2.6.2.3.2 ✓ 3.2.6.2.3.3 ✓ 3.2.6.2.3.4 ✓ 3.2.6.2.4 ✓ 3.2.6.2.5	1. Develop documented procedures and standards for cleaning and disposing of spoil materials. 2. Document current catch basin and ditch maintenance and inspection program and schedule. 3. Develop Checklist to assist with documentation of catch basins cleaned and linear footage of ditches cleaned/maintained. 4. Develop method to evaluate BMP effectiveness for reporting.	1. Continue the current catch basin and ditch maintenance and inspection program. 2. Present draft procedures to TSWC for comment. 3. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking .
6.8	Storage of construction materials and disposal of spoil	1. Continue current practice of storing bulk materials inside or under cover. 2. Township does not collect or generate construction debris.	1. Canfield Township will begin drafting documentation in Year 3 for storage and disposal procedures associated with construction materials, maintenance/ construction spoil materials.	BMP 6.8 addresses permit section 3.2.6.2.3.3	1. Track and record the amount and type of debris disposed of. 2. Develop method to record the amount and type of debris disposed of as follows: • Lbs. of soil. • Lbs. of stone. • Lbs. of other. 4. Develop method to track personnel provided training. 5. Develop method to evaluate BMP effectiveness for report. 6. Draft storage and disposal procedures or modifications.	1. Modify current storage practice of bulk materials based on review. 2. Begin to record amount and type of debris disposed of. 3. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking .

CANFIELD TOWNSHIP YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 6

ID	Best Management Practice	Permit Year 2004 Year 2 Objective	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
6.9	Fleet Maintenance	1. Begin program to document amount of vehicle fluids recycled and disposed of. 2. Track and evaluate BMP and document effectiveness. 3. Draft sediment basin maintenance and spoil disposal plan.	1. Review completed to document potential transfer of materials from garage surface to sediment basin due to floor sweeping regularity. 2. Investigate current floor drain connectivity to sediment basin.	1. BMP 6.9 addresses permit sections: ✓ 3.2.6.2.1 ✓ 3.2.6.2.3.1 ✓ 3.2.6.2.3.2 ✓ 3.2.6.2.3.3 ✓ 3.2.6.2.3.4 ✓ 3.2.6.2.4 ✓ 3.2.6.2.5	1. Develop vehicle fluid recycling form to begin documentation of amounts of vehicle fluids recycled and disposed of. 2. Draft storm water retention facility (sediment pond) maintenance and spoil disposal plan. 3. Draft Inside Trap cleaning frequency and procedures. 4. Track and evaluate BMP and document effectiveness. 5. Draft Fleet vehicle washing procedures and location requirements for performing vehicle washing.	1. Begin program to document amount of vehicle fluids recycled and disposed of. 2. Track and evaluate BMP and document effectiveness. 3. Present plan to Township Storm Water Committee. 4. Document amount of vehicle fluids recycled and disposed of. 5. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking . 6. Begin documentation of any facility drainage modifications related vehicle washing or floor drain reconnection or relocation.
6.10	Recycling/Separation/Disposal	1. Continue to track and evaluate BMP and document effectiveness.	1. Document these amounts in Year 3: <ul style="list-style-type: none"> • Tires • Vehicle Fluid 	1. BMP 6.10 addresses permit sections: ✓ 3.2.6.2.1 ✓ 3.2.6.2.3.1 ✓ 3.2.6.2.3.2 ✓ 3.2.6.2.3.3 ✓ 3.2.6.2.3.4 ✓ 3.2.6.2.4 ✓ 3.2.6.2.5	1. Develop procedures to document collected amounts of: ✓ Oil, ✓ Vehicle wash water ✓ Tires 2. Develop form to assist with tracking and evaluation of BMP effectiveness. 3. Develop method to track and report quantities.	1. Begin to document the quantities of materials recycled/reused/disposed of. 2. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking .

CANFIELD TOWNSHIP YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 6

ID	Best Management Practice	Permit Year 2004 Year 2 Objective	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
6.11	Oil and Water Separators	1. Begin to track and evaluate amounts cleaned and assess the effectiveness of the BMP.	1. Current maintenance program is documented as effective.	1. BMP 6.11 addresses permit sections: ✓ 3.2.6.2.1 ✓ 3.2.6.2.3.1 ✓ 3.2.6.2.3.2 ✓ 3.2.6.2.3.3 ✓ 3.2.6.2.3.4 ✓ 3.2.6.2.4 ✓ 3.2.6.2.5	1. Develop method and form to track and record frequency of maintenance and amount of spoil removed. 2. Track, evaluate and report number cleaned, lbs. of spoil collected and determine how to assess effectiveness of BMP. 3. Track, evaluate and report number cleaned, lbs. of spoil collected and determine how to assess effectiveness of BMP.	1. Begin to develop maintenance and documentation procedures. 2. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking .
6.12	Spill Management Procedures	1. Spill management procedures reviewed. 2. Spill management and initial response is the responsibility of the Fire Department.	1. A review of spill management procedures was completed.	Spill management is very effective in Canfield Township.	1. Continue to review spill management procedures and update as needed. 2. Determine with assistance from Township Fire Department how to document number of Spill responses during permit year? 3. Investigate benefit developing Spill incident storm water system base map? 4. Determine how to evaluate and assess BMP?	1. Continue to use the spill management procedures presently approved by Haz-Mat and Fire and update as needed. 2. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking .

COITSVILLE TOWNSHIP YEAR 2 ANNUAL REPORT
Table 1: Public Involvement/Participation Minimum Control Measure 1 & 2

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievement	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
1.1	Township Storm Water Management Committee	<ol style="list-style-type: none"> Coitsville Township formed a Storm Water Committee (SWC). Committee is comprised of Trustee, Road Supervisor, Zoning Inspector, and Resident in Year 1 Committee met twice in Year 2. Committee began development of a plan to contact target groups - service stations, commercial properties, and homeowner associations, directly. 	<ol style="list-style-type: none"> Severe flooding, in May and September 2004, federal disaster assistance was approved for citizens and local governments for Mahoning County. As a result of these events BMP and plan activity implementation was limited. Coitsville will begin program implementation in Year 3. 	1. BMP 1.1 addresses permit sections 3.2.1.2.3 and 3.2.2.2.3.	<ol style="list-style-type: none"> Township storm water management committee members will continue to attend County Storm water committee meetings. Township storm water management committee will perform the following activities in Year 3: <ul style="list-style-type: none"> ✓ Develop township BMP implementation schedule. ✓ Develop BMP table and determine responsible personnel for implementation, documentation and maintenance activities associated with BMP's. Develop Contact plan for: <ul style="list-style-type: none"> ✓ Service Stations ✓ Commercial Properties ✓ Home Owners Association ✓ School properties Determine how Township storm water BMP implementation, maintenance and support activities will tracked, collected and reported. Determine how BMP will be evaluated and assessed. 	<ol style="list-style-type: none"> Present completed BMP implementation schedule and contact plan to County Storm Water Committee. Present BMP Implementation plan to Township Trustees.
1.2	Newsletters	<ol style="list-style-type: none"> <u>Mahoning Matters</u>: Quarterly publication of Mahoning SWCD – distributed to 104,686 county residents. <u>Pipeline</u> – published twice a year by County Sanitary Engineer – distributed to 44,000 households 	<ol style="list-style-type: none"> <u>Mahoning Matters</u> – Title of Article printed in 2004. <u>Pipeline</u>- Title of article printed in 2004. Education Newsletter was distributed twice during Year 2 to 2,300 teachers, 300 were placed in the public library. 	1. BMP 1.3 addresses permit section 3.2.1.2.5. Due to budget constraints within the county, the SWCD staff hours were reduced. The Education Specialist resigned; consequently,	<ol style="list-style-type: none"> Assist in drafting information for <u>Mahoning Matters</u> article. One update in the <u>Pipeline</u> per year will continue to be an objective in Year 3. Document number of newsletters published. 	1. Collect copy(s) of published material. Report numbers.

COITSVILLE TOWNSHIP YEAR 2 ANNUAL REPORT
Table 1: Public Involvement/Participation Minimum Control Measure 1 & 2

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievement	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
		3. Articles on implementation of storm water program elements and specific storm water issues have been prepared to keep public informed about the program and increase awareness on specific issues and ways the public can assist in reducing pollution.		educational programs have been cut dramatically.	4. Provide Township storm water information for use in the Newsletters above.	
1.3	Public Meetings	<ol style="list-style-type: none"> 1. Township Trustee Meetings held twice monthly. 2. Continued working on township version of SWMP. 3. Township Trustee Meetings- Continued to address storm water issues- Year 2. 	<ol style="list-style-type: none"> 1. SWMP presentation was presented and discussed at Township Trustee work sessions. 2. Township Trustee meetings (held monthly) are both announced in local print media and televised 	1. BMP 1.3 addresses permit section 3.2.1.2.4, 3.2.1.2.6 and 3.2.2.2.2.	<ol style="list-style-type: none"> 1. Complete township trustee SWMP presentation. 2. Continue to encourage public involvement related to storm water issues during Township Trustee meetings. 3. Develop a Public involvement plan for citizens to become involved the Townships storm water program. 4. Consider including a citizen on Township storm water management committee (TSWMC). 5. Determine pollutants TSWMC will target. 6. Determine how information for this BMP will be collected, tracked, documented and reported. 7. Determine how BMP will be evaluated and assessed. 	<ol style="list-style-type: none"> 1. Continue to seek public input on the implementation of the SMWP. 2. Present identified target pollutants to Township trustees and coordinate with County storm water committee to align goals and objectives.

COITSVILLE TOWNSHIP YEAR 2 ANNUAL REPORT
Table 1: Public Involvement/Participation Minimum Control Measure 1 & 2

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievement	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
1.4	Community Activities	<ol style="list-style-type: none"> 1. <u>Green Team</u> <ol style="list-style-type: none"> a. Classroom and youth group presentations completed. Estimated number attended = 395 classroom presentations, estimated 9786 students. b. Teacher curriculum workshops completed. Estimated number of workshops = 6 An estimated 152 attendees. c. Waste assessment activities for small businesses completed. Estimated number of Business Assessed = 12 assessments conducted. d. Tours/Field Trips conducted. Type and number attended : Field Trip type – 11 held Attendance - e. Cooperative recycling Waste education programs to reduce litter. Summary of collection effort = 17,237 lbs. f. Special Collection Days: Collections: HHW =212,969 lbs. E-Collection =133,483 lbs. Appliance =265,680 lbs. Christmas Tree =93,725 lbs Christmas Wrap & Card =3,155 lbs Household Battery = 1200. 	<ol style="list-style-type: none"> 1. Green Team provides a recycling center for area residents and also provides one household hazardous waste collection, appliance collection, Christmas tree, gift card and wrapping paper collection. 2. Programs that were provided to area residents have proven to be successful. 3. Coitsville provides a recycling bin for residents' use. The bin is located at the township building and is available at all times. Please refer to the Mahoning County Annual Report. For collection data. 	<ol style="list-style-type: none"> 1. <u>Green Team</u> BMP 1.4 address permit sections 3.2.1.2.3, 3.2.1.2.5 and 3.2.2.2.4. 	<ol style="list-style-type: none"> 1. Develop efficient means for tracking and reporting Township recycled materials collected. 2. Outline/Develop needs for annual community clean-up day. 3. Begin to track amounts, report totals and assess and modify selected BMPs as necessary. 3. Work with Solid waste to track or breakout amounts specific to Coitsville. Township. 4. Set date and complete necessary procedural requirements for community clean up day. 	<ol style="list-style-type: none"> 1. Begin to track amounts, report totals, assess and modify selected BMPs as necessary. 2. Set date and complete necessary procedural requirements for community clean up day. 3. <u>Green Team</u> <ol style="list-style-type: none"> a. Estimated 350 classroom and youth group presentations. b. Estimated 4 teacher curriculum workshops c. Estimated 10 targeted waste assessment activities for small business. d. Estimated 5 targeted tours/ field trips e. Estimated 1 cash for cans, 2 school paper programs, 20 adopt - a - spot. f. Estimated 1 Household Hazardous Waste collection, 1 E collection, 1 Appliance collection, 1 Christmas tree collection, 1 Christmas wrap and card collection.

COITSVILLE TOWNSHIP YEAR 2 ANNUAL REPORT
Table 1: Public Involvement/Participation Minimum Control Measure 1 & 2

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievement	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
1.5	Brochures, Flyers, Fact sheets, and Handouts	1. Information and materials made available @ Township hall during Year 2: <ul style="list-style-type: none"> • Building/Zoning Permits – Water quality handouts. • <i>Mahoning Matters</i> • Mahoning SWCD- Car Washing tips. • Mahoning SWCD – Water Conservation, <i>Why should you Care?</i> • OEPA- <u>Protecting Ohio's Water</u>. • OSU Extension- Storm Water Fact Sheets. • MS4- Regulated area map 	1. Collected and organized information for public was made available at Town Hall facility. 2. Township Storm Water Committee continued working with Mahoning County Storm water committee to develop/collect information for County and Township use.	1. BMP 1.5 address permit sections 3.2.1.2.3, 3.2.1.2.5 and 3.2.2.2.4.	1. Continue working with County Storm water committee to develop and contribute information to the following: <ul style="list-style-type: none"> • <i>Mahoning Matters</i> • District Board of Health- Mailer regarding HSTS information. • Mahoning County Green Team • Mahoning County SWCD. 2. Investigate developing Township focused storm water brochure/factsheet. 3. Determine how BMP will be evaluated and assessed. 4. Document assessment rational for reporting.	1. Committee working on new techniques to distribute information and receive feedback and concerns from residents. 2. Determine tracking and documenting procedures. 3. Coordinate tracking and data recording needs with other SWMP BMPs.

COITSVILLE TOWNSHIP YEAR 2 ANNUAL REPORT

Table 2: Illicit Discharge Detection and Elimination Plan Minimum Control Measure 3

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
3.1	Map storm sewer system	<ol style="list-style-type: none"> 1. Severe flooding, in May and September 2004, federal disaster assistance was approved for citizens and local governments for Mahoning County. Year 2 – System Mapping was rescheduled for Year 3. Mahoning County is considering several protocols for inventory along with the attributes collected. 2. Township will initiate storm sewer mapping activities in Year 3. 3. Township to coordinate storm sewer inventory with County inventory to standardized system attribute collection. 	<ol style="list-style-type: none"> 1. Severe flooding, in May and September 2004, federal disaster assistance was approved for citizens and local governments for Mahoning County. Year 2 – System Mapping was rescheduled for Year 3. 	<ol style="list-style-type: none"> 1. BMP will address permit section 3.2.3.1.2 and 3.2.3.2.1 2. BMP Assessment here will be based on percent complete per year between Year 3 and Year 4. 	<ol style="list-style-type: none"> 1. Outline System inventory approach/sequence and schedule for system outfalls and Home Sewer Treatment System (HSTS) outfalls. Coordinate HSTS inventory with District Board of Health and Mahoning County Engineers office. 2. Develop inventory protocols. 3. Determine how and where outfall inventory will be stored or filed. 4. Determine how inventory data will be linked with County- GIS mapping to create “Storm Sewer Base Map”. 5. Determine system attributes to be collected. 6. Consider including “Simple” dry weather screening activities (Color, odor, presence of flow) which can be easily performed during inventory as a method to begin identification of potential illicit discharge locations. 	<ol style="list-style-type: none"> 1. Begin inventory. 2. Complete base map for use in inventory. 3. Document process (Protocol). 4. Draft revised completion schedule. 5. Address the Dry weather screening issue

COITSVILLE TOWNSHIP YEAR 2 ANNUAL REPORT
Table 2: Illicit Discharge Detection and Elimination Plan Minimum Control Measure 3

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
3.2	Develop program to detect and eliminate illicit discharges	1. Severe flooding, in May and September 2004, federal disaster assistance was approved for citizens and local governments for Mahoning County. Year 2 – System Mapping was rescheduled for Year 3. The Township will initiate storm sewer system mapping and inventory preparation activities in Year 3- scheduled completion date in permit Year 5.	1. Severe flooding, in May and September 2004, federal disaster assistance was approved for citizens and local governments for Mahoning County. Year 2 – System Mapping was rescheduled for Year 3. The Township will initiate storm sewer system mapping and inventory preparation activities in Year 3- scheduled completion date in permit Year 5.	1. BMP 3.2 addresses permit sections: <ul style="list-style-type: none"> ✓ 3.2.3.1.3 ✓ 3.2.3.1.4 ✓ 3.2.3.1.5 ✓ 3.2.3.2.2 ✓ 3.2.3.2.3 ✓ 3.2.3.2.4 ✓ 3.2.3.2.4.1 ✓ 3.2.3.2.4.2 ✓ 3.2.3.2.4.3 ✓ 3.2.3.2.4.4 2. Wastewater discharges that are identified during any inspection are required to be corrected to comply with Section 2 part C,D,E,F, & G of the Regulation of Household Sewage Disposal Systems. 3. Off-lot discharges are permitted for wastewater when an on-lot system can not be installed and the off-lot system is installed to comply with the Regulations of Household Sewage Disposal Systems Section 2 part G.	1. Begin development of Illicit Discharge Ordinance. Outline suggested enforcement procedures. (3.2.3.1.3 and 3.2.3.2.3). Develop draft schedule for implementation. 2. Develop preliminary Illicit Discharge Elimination Plan (IDEP). Plan should include procedures for detection and process for removal and reporting. IDEP should include schedule and implementation steps. (3.2.3.1.4, 3.2.3.2.2, 3.2.3.2.4) 3. Develop IDEP program factsheet for public and employee use. (3.2.3.1.5) 4. Develop preliminary Dry Weather Screening plan. Plan. (3.2.3.2.4.1 and 3.2.3.2.4.2). 5. Process for prioritizing “Hot Spot” areas. 6. Develop general procedures for removing identified illicit discharges. 7. Develop BMP evaluation/assessment criteria or procedures. Document status for annual report in Year 3. 7. Determine storage/file location of collected IDEP information/elimination data/follow up action- required or taken. 8. Determine how BMP will be evaluated and assessed. 9. Document assessment rational for reporting.	1. Work with County engineer and Township Trustees to complete and obtain approval of Illicit Discharge Ordinance/regulation. 2. Work with County Sanitary Engineer, District Board of Health, Townships and Mill Creek Metroparks to draft both Illicit Discharge Ordinance language and to outline the IDEP program for the County. 3. Determine the following: <ul style="list-style-type: none"> ✓ Champion for IDEP program. ✓ Where IDEP will be filed and how will data be linked with County GIS. ✓ Determine whether the Dry Weather Screening will be performed during inventories. ✓ Complete schedule ✓ OEPA recommended 100 % dry weather screening be completed between Year 3 and Year 5. ✓ Draft NOV form. ✓ Evaluation process.

COITSVILLE TOWNSHIP YEAR 2 ANNUAL REPORT
Table 2: Illicit Discharge Detection and Elimination Plan Minimum Control Measure 3

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
3.3	Adopt resolutions prohibiting illicit discharges	1. Began Ohio Revised Code (ORC) and Township authority research related to County authority to implement regulations related to illicit discharge.	1. Based on research results. Regulation/ordinance should include or address the following: <ul style="list-style-type: none"> ✓ Prohibition of Illicit discharges and illegal dumping. ✓ Enforcement ✓ Private property access for investigative purposes to determine illicit source. ✓ First offense warning-NOV. 	1. See BMP 3.2 for permit sections.	1. Complete review. See BMP 3.2 for sequence details. 2. Draft summary of findings document. 3. Prepare draft Illicit Discharge regulation including: <ul style="list-style-type: none"> ✓ Prohibition of Illicit discharges and illegal dumping. ✓ Enforcement ✓ Private property access for investigative purposes to determine illicit source. ✓ First offense warning-NOV. 4. Determine how BMP will be evaluated and assessed. 5. Document assessment rational for reporting.	1. Present Draft Illicit Discharge regulation to Township Storm water committee for review and comment. 2. Revised regulation based on comments. 3. Schedule meeting with Township Trustees to present draft regulation. 4. Follow through regulation adoption process to achieve passage of draft regulation(s).

COITSVILLE TOWNSHIP YEAR 2 ANNUAL REPORT
Table 2: Illicit Discharge Detection and Elimination Plan Minimum Control Measure 3

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
3.4	<p>Total Maximum Daily Load (TMDL) (Ohio EPA Permit Section 1.3.6) County and Township procedures should be able to demonstrate how they determined the amount of pollutant needed to be reduced within the impaired stream segment(s), and how much pollutant was reduced (i.e., water sampling to verify the amounts removed).</p>	<ol style="list-style-type: none"> 1. Table completed identifying Approved and pending TMDLs within Ohio. 2. Preliminary Mahoning County map developed showing proposed TMDL's. Map identifies regulated MS4 permit boundaries and overlays this information onto TMDL delineated watersheds. 	<ol style="list-style-type: none"> 1. County's consultant currently has a system in place to identify the TMDL watersheds located throughout the county. 2. Began development of regulated areas which overlay on top of TMDL watershed. Table includes approved and pending approval TMDLs only. 	<ol style="list-style-type: none"> 1. BMP 3.5 addresses permit section 1.3.6. 2. OEPA Construction General Permit. 	<ol style="list-style-type: none"> 1. Provide information/assistance for Mahoning County to complete TMDL layer development for the storm water Base Map. 2. Provide assistance to assist Mahoning County with completing TMDL table. Table will include the following: <ul style="list-style-type: none"> ✓ TMDL HUC code and stream name. ✓ General Description of location. ✓ Summary of causes and sources. 3. Investigate and document Township potential sources as identified in TMDL. 4. Document all assumptions made during potential source assessments. 5. Assist through Township Storm Water Management Committee with drafting outline of process to be developed in Year 5 of permit term which preliminary procedures to be implemented to address identified sources on a planning and project basis. 6. Determine how BMP will be evaluated and assessed. 7. Document assessment rational for reporting. 	<ol style="list-style-type: none"> 1. Present map and table to Township storm water management committee and Township Trustees for review and comment. 2. Review updated Mahoning County Drainage Manual for potential edits based on completed mapping and tables.

COITSVILLE TOWNSHIP YEAR 2 ANNUAL REPORT

Table 3: Construction Site Storm Water Control Plan Minimum Control Measure 4

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
4.1	Adopt erosion and sediment control zoning resolutions.	1. Mahoning County Engineers office and Mahoning County Soil and Water Conservation District completed development of <i>Mahoning County Drainage and Sediment Control Manual- Year 2 (2004)</i> . Manual includes: <ul style="list-style-type: none"> ✓ Drainage Design and Engineering ✓ Storm Drainage Systems ✓ Post-Construction Storm Water Management Requirements ✓ Storm Water Pollution Prevention plans and Erosion and sediment Control Requirements ✓ Current Flood Plain Regulations. 	1. Mahoning County has developed E&SC Regulations. The E&SC Regulations are included in the revised and updated <i>Mahoning County Drainage and Sediment Control Manual</i> . 2. Resolution from the Mahoning County Commissioners adopting the revised/updated Drainage Criteria and Erosion & Sediment Control Manual will be in place spring 2005.	1. BMP 4.1 Addresses permit sections: <ul style="list-style-type: none"> ✓ 3.2.4.1.1 ✓ 3.2.4.1.2 ✓ 3.2.4.1.3 ✓ 3.2.4.1.4 ✓ 3.2.4.1.6 ✓ 3.2.4.2.1 ✓ 3.2.4.2.2 ✓ 3.2.4.2.3 2. OEPA Construction General Permit (CGP).	1. Review current Township regulations/resolutions governing Erosion and Sediment Control. 2. Determine necessary modifications to current resolution/regulation in order to adopt <i>Mahoning County Drainage and Erosion and Sediment Control Manual</i> as the Township design manual. 3. Identify potential areas of Manual which from the Township perspective may need to be updated to fit Township requirements. 4. Implement the new requirements contained within the revised/updated Drainage Criteria and Erosion & Sediment Control Manual. 5. Develop necessary support forms, checklists to aid in plan review. 6. Determine how BMP will be evaluated and assessed. 7. Document assessment rational for reporting.	1. Mahoning County will provide updates/revisions to the Manual periodically based on reviews of actual Manual concepts implemented in the field. 2. Mahoning County will consider Manual user suggestions and feedback on improving Manual content and applicability. 3. Support Mahoning County in conducting Manual workshops.

COITSVILLE TOWNSHIP YEAR 2 ANNUAL REPORT

Table 3: Construction Site Storm Water Control Plan Minimum Control Measure 4

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
4.2	Workshops on E&SC Resolutions	1. SWCD held multiple site specific workshops and presentations related to Erosion and Sediment Control.	1. On-site workshops were conducted as contractors and builders had questions relating to ESC practices arose during construction. 2. Significant time and effort by SWCD went into the preparation of the soon to be adopted Mahoning County E&SC Regulations.	1. See BMP 4.1 for permit sections.	1. 2 – Half-day workshops will be scheduled in connection with how to use the updated manual. 2. TSWMC will develop and provide an estimated 2 workshops on erosion and sediment control BMPs in Year 3. Content includes - How to comply with the revised resolutions and how to use the updated manual? 3. Assist County SWMC with developing County and Township relevant Storm water fact sheets. 4. Develop method to track and document workshop attendance. 5. Develop a schedule for completing workshop material and also a schedule for updating workshop materials.	1. Publish workshop on web page. 2. Complete workshop material development.
4.3	Enter into Memorandum of Understanding (MOU) with Mahoning SWCD	1. MOU Review and update completed in Year 2. 2. Mahoning County SWCD will continue to provide site plan review and Site erosion control inspection. 3. MOU provides guidance in delegating SWCD services in relation to Mahoning County Storm Water Plan Compliance.	1. MOU developed and signed between SWCD and the Mahoning County Engineer's Office, outlining cooperative duties/services provided by each entity.	1. BMP 4.3 addresses permit sections 3.2.4.2.2 and 3.2.4.3.4.	1. Review MOU language and update as necessary throughout Year 3. 2. Consider alternative/backup based on SWCD availability in years 3- 5 of the permit.	1. Document MOU changes as necessary.

COITSVILLE TOWNSHIP YEAR 2 ANNUAL REPORT

Table 3: Construction Site Storm Water Control Plan Minimum Control Measure 4

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
4.4	<p>Review Erosion & Sediment Control plans/Storm Water Pollution Prevention Plans (SWPPP)</p> <p>Note: BMP name change.</p>	<ol style="list-style-type: none"> 1. Continued current plan review process. 2. Current plan process: <ul style="list-style-type: none"> ✓ Townships review site plans. ✓ Engineer reviews site plans (Springfield Twp.). ✓ SWCD reviews SWPPP and Erosion and Sediment Control plans. 	<ol style="list-style-type: none"> 1. SWCD reviews residential (sub-division) and other projects requiring submission of E/S plans. The updated manual did not change the plan review process. 2. Continue to work with County Engineer, SWCD and Building Departments to provide support for site erosion/sediment reviews. 	<ol style="list-style-type: none"> 1. BMP 4.4 addresses permit section 3.2.4.1.4. 	<ol style="list-style-type: none"> 1. Coitsville Township will adopt the Erosion and Sediment Control regulations contained within the <i>Mahoning County Drainage and Erosion and Sediment Control Manual</i>. 2. SWCD will work with Mahoning County Engineers office to update website with E&SC Requirements (including checklists). 3. Zoning Inspectors will be cross-trained to review site plans associated with E&SC. Currently, review is provided for building zones and building setbacks. 4. Develop Method to track and document number reviewed. 6. Determine how BMP will be evaluated and assessed. 7. Document assessment rational for reporting. 	<ol style="list-style-type: none"> 1. Track number of plans reviewed for E/S controls. 2. Document date E/S checklist placed on web page. 3. Document Township adoption of E&SC Regulations. 4. Coordinate program elements which need tracking with County program tracking needs. Determine benefit of leveraging similar tracking requirements.

COITSVILLE TOWNSHIP YEAR 2 ANNUAL REPORT

Table 3: Construction Site Storm Water Control Plan Minimum Control Measure 4

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
4.5	Construction debris collection and disposal	1. SWCD ES&C plan checklist includes Construction Debris Collection and Disposal.	1. Erosion and Sediment Control site inspection checklist was modified in Year 2 to include Construction debris and disposal. 2. Year 3- will focus on investigating methods to collect and document volumes of Construction debris removed and disposed of properly.	1. BMP 4.5 addresses permit section 3.2.4.2.3.	1. Develop standards for appropriate on-site collection systems/containers. 2. Develop appropriate site locations for placing containers. 3. Develop disposal procedures, frequency of pick up and potential secondary containment requirements. 4. Draft resolutions which will allow for enforcement of non-compliance. 5. Develop site inspection requirements and include in Zoning inspectors cross-raining (See BMP 4.4). 6. Determine how BMP will be evaluated and assessed. 7. Document assessment rational for reporting.	1. SWCD to continue to inspect/evaluate active construction sites, using county enforcement abilities as they are developed. 2. SWCD will track inspections with Urban Site Program (ACCESS database). 2. Using Urban Site Program method to track sites and document violations. Collect quantitative information on volumes and number of violations and corrections for reporting.
4.6	Inspect active sites SWCD will continue inspect active construction sites.	1. SWCD – continued with current construction site inspection program. 2. Began implementation Urban Site Program Database tracking system. 3. Activity Summary-140+ inspections occurred in Year 2. Four sites referred to Ohio EPA for enforcement action. 4. 140+ inspections occurred in Year 2. Four sites referred to Ohio EPA for enforcement action.	1. Active construction sites are inspected/evaluated against compliance conditions set forth in OEPA's Construction General Permit. 2. Inspections are tracked with Urban Site Program (ACCESS database).	1. BMP 4.5 addresses permit section 3.2.4.1.6 2. Inspections provided local impetus for compliance with terms of NPDES/Construction storm water permit.	1. SWCD – continue with current construction site inspection program. 2. Develop method to collect and present data from Urban site Program for reporting purposes. 3. Determine data presentation format. 4. Determine Inspection frequency/schedule. OEPA SWMP comment indicated minimum of once per month. 4. Determine how BMP will be evaluated and assessed. 5. Document assessment rational for reporting	1. Report out data from Urban Site Program. Number of sites. 2. Summary of recurring violations. 3. Modify E/S controls if necessary to reduce recurring inspection noted deficiencies.

COITSVILLE TOWNSHIP YEAR 2 ANNUAL REPORT

Table 3: Construction Site Storm Water Control Plan Minimum Control Measure 4

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
4.7	Enforcement actions	Coitsville Township will adopt <i>Mahoning County Drainage and Erosion and Sediment Control Manual</i> , by adopting the manual the following applies: 1. Mahoning County Engineers office and Mahoning County Soil and Water Conservation District completed development of <i>Mahoning County Drainage Erosion and Sediment Control Manual- Year 2 (2004)</i> . 2. Reviewed other County-E/S enforcement requirements/ regulations during development of the updated manual. 3. Notice of Violation form implemented to notify developers/contractors of major non-compliances.	1. Review and track enabling legislation for additional enforcement as passed by the State Legislature. 2. Mahoning County E&S Regulations will be amended as legislation continues to change.	1. BMP addresses permit section 3.2.4.2.6 2. Commissioners will be urged to adopt a resolution allowing the use HB 411 to enable County to enforce regulations.	1. Implement new requirements contained in the updated Drainage and Sediment and Erosion Control Manual. 2. Determine fee structure for NOV and re-inspection fee. Re-inspection fees after 3 consecutive NOVs will be implemented. 3. Determine method to track, record and document Inspections and enforcement actions taken. 4. Determine how BMP will be evaluated and assessed. 5. Document assessment rational for reporting. 6. Develop method/enforcement mechanism that zoning inspector can issue stop work order. Coordinate with County prosecutor as necessary.	1. Mahoning County will provide updates/revisions to the Manual periodically based on reviews of actual Manual concepts implemented in the field. 2. Mahoning County will consider Manual user suggestions and feedback on improving Manual content and applicability.
4.8	Respond to public complaints regarding construction activities	1. Began process of establishing a contact number for public feedback/complaints. 2. Current system in place under Year 2 – Direct complaints to SWCD.	1. Current mechanism in place is to direct complaints through SWCD.	1. BMP 4.7 addresses permit section 3.2.4.2.5.	1. Develop and publish call in number for water quality, construction site pollution complaints. 2. Develop method to track and document complaints. 3. Tracking will allow for follow up and documentation of complaint resolution. 4. Determine how BMP will be evaluated and assessed. 5. Document assessment rational for reporting. 6. Coitsville Township will advertise through newsletter and web site, a phone number for residents concerned about specific construction activities.	1. Establish call in number. 2. Determine tracking and documenting procedures.

COITSVILLE TOWNSHIP YEAR 2 ANNUAL REPORT

Table 3: Construction Site Storm Water Control Plan Minimum Control Measure 4

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
4.9	Concrete Truck Wash Out	1. Concrete Truck Wash Out procedures and locations were identified in the updated drainage and erosion and sediment control manual.	1. Checklist developed includes requirements for concrete truck wash-out. 2. CGP was used to develop procedures and text for this BMP. 3. Regulations have been adopted and will be included as addendums to the updated drainage regulations.	1. BMP 4.9 addressed permit section 3.2.4.1.3. 2. E&SC plans are required to designate procedures for concrete truck wash-out.	1. Develop standard drawing for BMP. 2. Document violations and corrections at sites. 3. Determine method to track and document violations and corrective action. 4. Determine how BMP will be evaluated and assessed. 5. Document assessment rational for reporting.	1. Continue to apply checklist to review SWPPP and E/S plans. 2. Coordinate tracking and data recording needs with other SWMP BMPs.
4.10	Construction Site Ingress/Egress	1. Ingress/Egress BMP procedures were addressed in the updated drainage and erosion and sedimentation control manual.	1. Checklist developed includes requirements for site ingress/egress protection. 2. CGP was used to develop procedures and text for this BMP. 3. Regulations have been adopted and will be included as addendums to the updated drainage regulations.	1. BMP 4.10 addressed permit section 3.2.4.1.3. 2. E&SC plans are required to designate procedures for Construction Site ingress/egress.	1. Develop standard drawing for BMP. 2. Document violations and corrections at sites. 3. Determine method to track and document violations and corrective action. 4. Determine how BMP will be evaluated and assessed. 5. Document assessment rational for reporting.	1. Continue to apply checklist to review SWPPP and E/S plans. 2. Coordinate tracking and data recording needs with other SWMP BMPs.

COITSVILLE TOWNSHIP YEAR 2 ANNUAL REPORT
Table 4: Post-Construction Storm Water Minimum Control Measure 5

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
5.1	Workshops for Post-Construction Regulations Note: BMP name change	1. SWCD held multiple site specific workshops and presentations related to Erosion and Sediment Control. 2. 2 – Half-day workshops will be scheduled in connection with how to use the updated manual. 3. Complete updates to Drainage and Sediment and Erosion Control Manual, which included Post-Construction BMP's. Note: Workshops for Year 2 were sediment/Erosion control focused.	1. On-site workshops were conducted as contractors and builders had questions relating to ESC practices arose during construction. 2. Significant time and effort by SWCD went into the preparation of the soon to be adopted Mahoning County E&SC Regulations. Note: Year 3- workshops will be modified to accommodate Post-Construction Controls.	1. BMP 5.2 addresses permit section 3.2.5.2.3.3. 2. Construction General Permit.	1. Develop materials and schedule a minimum of 2 workshops focused on Mahoning County's Post-Construction BMP's. 2. Develop schedule to perform reviews and updates of workshop materials. 3. Determine how BMP will be evaluated and assessed. 4. Document assessment rational for reporting. 5. Determine how to track workshop attendance and update workshop materials as necessary.	1. Investigate and identify location or sources that developers, contractors, engineers, builders and public can go to access information on Post-Construction storm water management BMP's.
5.2	Post-Construction Storm Water Management Resolutions- See County table BMP 5.1. Note: By reference this BMP covers BMP's 5.1.1 through 5.1.6 addressed in detail in the county Post-Construction MCM table. (Structural and Non-Structural).	1. Mahoning County Engineers office and Mahoning County Soil and Water Conservation District completed development of <i>Mahoning County Drainage and Sediment Control Manual- Year 2 (2004)</i> . 2. Section 4.4 in the updated Drainage manual addresses this BMP with supporting schematic drawings. 3. County Engineer held a public comment period for the Manual as required by ORC. Comments were incorporated into the manual prior to final edits and presentation to County commissioners.	1. Post-Construction BMP's will begin to be reviewed and assessed beginning in Year 3. 2. Evaluation of BMP will assist in establishing goals and determining effective BMPs for use in Mahoning County.	1. BMP 5.1.1 addresses permit sections: ✓ 3.2.5.2.4 ✓ 3.2.5.2.4.2 ✓ 3.2.5.2.4.3 2. OEPA Construction General Permit (CGP): ✓ Post-Construction Section – Part III.G.2.e	1. Determine method to track BMPs installed for maintenance purposes. 2. Develop BMP maintenance document. 3. Investigate value in developing a GIS layer to locate these on storm water base map. 4. Investigate and establish BMP measurable goals for reporting and evaluation. 5. Determine evaluation or assessment methods to determine appropriateness. 6. Document evaluation rational for reporting.	1. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking . 2. Develop and identify BMP maintenance needs and responsible personnel. 3. Consider developing BMP maintenance manual. OEPA SWMP comment recommends minimum inspection frequency of 1x annually. (See BMP 5.3)

COITSVILLE TOWNSHIP YEAR 2 ANNUAL REPORT
Table 4: Post-Construction Storm Water Minimum Control Measure 5

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
5.3	Develop Strategies and Policies to address maintenance of privately owned storm water facilities.	1. Coitsville Township discussed with County Engineer and County Prosecutor issues related to township authority to require maintenance or maintain private storm water management facilities (residential and commercial) in Year 2.	1. Discussion initiated to begin drafting potential resolution addressing maintenance of residential and commercial storm water management facilities.	1. BMP 5.3 addresses permit section 3.2.3.2.2, 3.2.3.2.3 and 3.2.6.1.4. 2. Continuing legal research concerning township's authority to regulate private storm water facilities.	1. Continue researching and documenting legal authority associated with Townships ability to require maintenance be performed on private Storm Water Management facilities. 2. Investigate Adopting maintenance standards that would be consistent with the Ohio Revised Code. 3. Investigate level of effort associated with mapping privately owned storm water management facilities for both water quality purposes and more importantly as a tool to assist with water quantity/flood control management. 4. Develop BMP maintenance form. 5. Outline short and long term strategies for BMP maintenance requirements. 6. Determine facility attributes to obtain during mapping of facilities. 7. Determine how BMP maintenance will be evaluated and assessed. 8. Document assessment rational for reporting.	1. Implementation is dependent of resolution of legal authority issue. 2. Township will identify (map) all privately (residential/commercial/industrial) owned storm water facilities and develop and implement standards for frequency and required maintenance, along with proper documentation of maintenance. Coordinate tracking and data recording needs with other SWMP BMPs, both at the county and Township levels. 3. Consider developing BMP maintenance manual. OEPA SWMP comment recommends minimum inspection frequency of 1x annually. (See BMP 5.3)

COITSVILLE TOWNSHIP YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 6

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
6.1	Operation and maintenance program to prevent or reduce storm water pollution from community operations	1. Completed identification of community operations which will be incorporated into the <i>Storm water BMP Operations and Maintenance Manual</i> .	1. Target date for completion of storm water O/M by December 2005.	1. BMP 6.1 addresses permit section 3.2.6 through 3.2.6.2.5	1. Complete development of operations and maintenance procedures for manual. 2. Road Superintendent to continue conducting quarterly training on storm water O&M procedures and reporting. 3. Develop O/M training materials. 4. Document number attended, date, topics. 5. Determine how O/M procedures will be evaluated and assessed. 6. Document assessment rational for reporting.	. 1. Begin to implement completed Operation and Maintenance procedures related to storm water pollution reduction. 2. Determine how to collect and record information for reporting purposes. 3. Coordinate program elements which need tracking with County program tracking needs. Determine benefit of leveraging similar tracking requirements. 4. Consider developing BMP maintenance manual. OEPA SWMP comment recommends minimum inspection frequency of 1x annually. (See BMP 5.3)

COITSVILLE TOWNSHIP YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 6

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
6.2	Staff education program on pollution prevention	1. Completed review of potential training and education materials in Year 2.	1. Target date for completion of staff education program December 2005.	1. BMP 6.2 addresses permit section 3.2.6.1.1 and 3.2.6.1.2.	<ol style="list-style-type: none"> 1. Identify potential pollution sources/pollution types per maintenance activity to better focus training and O/M practices on. 2. Identify areas/practices/procedures that could be updated and incorporate water quality elements. 3. Develop training schedule and materials based on review of O/M review and focus training on target audience. 4. Determine evaluation or assessment methods to determine BMP appropriateness or effectiveness. 5. Determine methods to track and organize training attendees, when training materials need to be updated and reporting needs. 	<ol style="list-style-type: none"> 1. Present training needs to storm water committee. 2. Outline training materials need and develop schedule to develop, secure and build training program. OEAP SWMP comment- Recommends 1x year to hold training. 3. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking .

COITSVILLE TOWNSHIP YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 6

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
6.3	Street Sweeping	<ol style="list-style-type: none"> 1. Scheduled periodic street sweeping as needed in Year 2. 2. Began assessing sweeping frequency need. 	<ol style="list-style-type: none"> 1. Street sweeping performed as scheduled in Year 2. 	<ol style="list-style-type: none"> 1. BMP 6.3 addresses permit sections: <ul style="list-style-type: none"> ✓ 3.2.6.2.1 ✓ 3.2.6.2.3.1 ✓ 3.2.6.2.3.2 ✓ 3.2.6.2.3.3 ✓ 3.2.6.2.3.4 ✓ 3.2.6.2.4 ✓ 3.2.6.2.5 	<ol style="list-style-type: none"> 1. Draft sweeping schedule and procedures. Tie protocols/procedures to training being developed in 6.2. Post on county web page schedule. 2. Develop forms to record quantity of street sweepings collected. 3. Determine evaluation or assessment methods to determine BMP appropriateness or effectiveness. 4. Develop system to track and store collected information for reporting purposes. 	<ol style="list-style-type: none"> 1. Perform and record street sweeping activities- number of miles, amount collected. 2. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking .
6.4	Litter Pickup	<ol style="list-style-type: none"> 1. Review and develop draft Litter Pick-up Operation and Maintenance procedures related to storm water pollution reduction. 2. .Develop a plan for litter pickup to take place in the Spring of 2005. 3. Road Superintendent to begin to conduct quarterly training on O&M procedures and reporting. 	<ol style="list-style-type: none"> 1. Continue participating in Mahoning County program; develop a means of documenting amount of litter collected for reporting purposes. 	BMP 6.4 addresses permit section 3.2.6.2.3.2	<ol style="list-style-type: none"> 1. Draft procedures to collect and report quantities of trash collected. Develop forms as necessary to track collections. 2. Draft method to track and report. 3. Determine evaluation or assessment methods to determine BMP appropriateness or effectiveness. 	<ol style="list-style-type: none"> 1. Present process and method to Township Storm Water Committee. Revise as necessary. 2. Implement BMP. 3. Township will develop method to track and report on quantity collected by June 2005. 4. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking .

COITSVILLE TOWNSHIP YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 6

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
6.5	Salt Storage and Applications	<ol style="list-style-type: none"> 1. Reviewed current salt storage area drainage system. 2. Document handling, storing and post-event clean-up practices. 3. Gained knowledge of salt storage drainage systems. 	<ol style="list-style-type: none"> 1. Road Superintendent reviewed site drainage system and cleanup procedures with staff. 	<ol style="list-style-type: none"> 1. BMP 6.5 addresses permit sections: <ul style="list-style-type: none"> ✓ 3.2.6.2.1 ✓ 3.2.6.2.3.1 ✓ 3.2.6.2.3.2 ✓ 3.2.6.2.3.3 ✓ 3.2.6.2.3.4 ✓ 3.2.6.2.4 ✓ 3.2.6.2.5 	<ol style="list-style-type: none"> 1. Conduct drainage survey of all storage facilities (Salt storage, material storage, by-product storage, spoil storage, liquid storage and secondary containment storage, etc.). 2. Document findings and determine method to prioritize locations in need of modifications or upgrades. 3. Develop written clean up procedures. 4. Draft salt storage procedures. 5. Document application procedures and procedures for clean up if excess salt is applied or a salt spill occurs. 6. Track and evaluate the BMP and document effectiveness. 7. Determine how to evaluate/assess modifications and post event clean up activities or procedures. 	<ol style="list-style-type: none"> 1. Modify drainage system if necessary. 2. Implement developed and documented clean up procedures, salt storage procedures and application procedures. 3. Record total de-icing material used annually. 4. Complete storage facility drainage/outfall inventory. 5. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking .
6.6	Mowing Practices	<ol style="list-style-type: none"> 1. Review in field fueling practices. 2. Began documentation of staff practices related to clean fueling and mowing practices. 	<ol style="list-style-type: none"> 1. Review completed in Year 2. 	BMP 6.6 addresses permit section 3.2.6.2.3.1	<ol style="list-style-type: none"> 1. Document in field fueling practices and other mowing operations practices with staff before cutting season. 2. Develop method to track personnel provided training. 3. Develop method to evaluate BMP effectiveness for report. 4. Investigate water quality value of modifying current mowing height. 	<ol style="list-style-type: none"> 1. Continue to practice clean in field fueling practices and other mowing practices. 2. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking .

COITSVILLE TOWNSHIP YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 6

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
6.7	Storm Water System Maintenance	1. Continue the current maintenance schedule. 2. Develop written procedures and standards.	1. Determine how to record total in Year 3.	1. BMP 6.7 addresses permit sections: ✓ 3.2.6.2.1 ✓ 3.2.6.2.3.1 ✓ 3.2.6.2.3.2 ✓ 3.2.6.2.3.3 ✓ 3.2.6.2.3.4 ✓ 3.2.6.2.4 ✓ 3.2.6.2.5	1. Develop documented procedures and standards for cleaning and disposing of spoil materials. 2. Document current catch basin and ditch maintenance and inspection program and schedule. 3. Develop Checklist to assist with documentation of catch basins cleaned and linear footage of ditches cleaned/maintained. 4. Develop method to evaluate BMP effectiveness for reporting.	1. Continue the current catch basin and ditch maintenance and inspection program. 2. Present draft procedures to SWC for comment. 3. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking .
6.8	Storage of construction materials and disposal of spoil	1. Develop plans to move bulk materials to inside storage. 2. Develop guidelines for storage of construction materials and construction debris. 3. Continue current practice. Track and record the amount and type of debris disposed of.	1. Committee composed a list of possible inside storage facilities and appropriate disposal landfills.	BMP 6.8 addresses permit section 3.2.6.2.3.3	1. Review current storage practices. 2. Draft storage and disposal procedures or modifications. 3. Develop method to record amount and type of debris disposed of as follows: <ul style="list-style-type: none"> • Lbs. of soil. • Lbs. of stone. • Lbs. of other. 4. Develop method to track personnel provided training. 5. Develop method to evaluate BMP effectiveness for report.	1. Modify current storage practice of bulk materials based on review. 2. Begin to record amount and type of debris disposed of. 3. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking .

COITSVILLE TOWNSHIP YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 6

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
6.9	Fleet Maintenance	1. Vehicle site maintenance and washing drainage reviewed. 2. Vehicle fluid recycling procedures reviewed.	1. Review current site drainage. 2. Draft vehicle washing procedures and location. 3. Develop procedures to track and report on the handling of vehicle fluids, tires, and batteries	1. BMP 6.9 addresses permit sections: ✓ 3.2.6.2.1 ✓ 3.2.6.2.3.1 ✓ 3.2.6.2.3.2 ✓ 3.2.6.2.3.3 ✓ 3.2.6.2.3.4 ✓ 3.2.6.2.4 ✓ 3.2.6.2.5	1. Develop vehicle fluid recycling form to begin documentation of amounts of vehicle fluids recycled and disposed of. 2. Draft Inside Trap cleaning frequency and procedures. 3. Track and evaluate BMP and document effectiveness. 4. Draft Fleet vehicle washing procedures and location requirements for performing vehicle washing.	1. Document amount of vehicle fluids recycled and disposed of. 2. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking . 3. Begin documentation of any facility drainage modifications related vehicle washing or floor drain reconnection or relocation.
6.10	Recycling/Separation/Disposal	1. Develop procedures to track and report vehicle material recycled, litter through the Mahoning County litter pick-up program and current township practices for plastic, paper and hazardous waste collection operations.	1. Record keeping is provided by the recycling coordinator and the Green Team. 2. Track and evaluate BMP and document effectiveness.	1. BMP 6.10 addresses permit sections: ✓ 3.2.6.2.1 ✓ 3.2.6.2.3.1 ✓ 3.2.6.2.3.2 ✓ 3.2.6.2.3.3 ✓ 3.2.6.2.3.4 ✓ 3.2.6.2.4 ✓ 3.2.6.2.5	1. Develop procedures to document collected amounts of: ✓ Oil, ✓ Tires 2. Develop form to assist with tracking and evaluation of BMP effectiveness. 3. Develop method to track and report quantities.	1. Begin to document the quantities of materials recycled/reused/disposed of. 2. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking .

COITSVILLE TOWNSHIP YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 6

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
6.11	Oil/ Water Separators	1. Document procedures. 2. Follow proper use and maintenance procedures.	1. Documentation kept and on record on the Town Hall.	1. BMP 6.11 addresses permit sections: ✓ 3.2.6.2.1 ✓ 3.2.6.2.3.1 ✓ 3.2.6.2.3.2 ✓ 3.2.6.2.3.3 ✓ 3.2.6.2.3.4 ✓ 3.2.6.2.4 ✓ 3.2.6.2.5	1. Develop method and form to track and record frequency of maintenance and amount of spoil removed. 2. Document maintenance procedures for Township Oil.Water separators. 3. Track, evaluate and report number cleaned, lbs. of spoil collected and determine how to assess effectiveness of BMP.	1. Begin to develop maintenance and documentation procedures. 2. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking .
6.12	Spill Management Procedures:	1. Review spill management procedures and update as needed.	1. The township fire department will develop management procedures.	1. Procedures used are those approved by the Mahoning County Hazmat Department and the Township Fire Department.	1. Continue to review spill management procedures and update as needed. 2. Determine with assistance from Township Fire Department how to document number of Spill responses during permit year? 3. Investigate benefit developing Spill incident storm water system base map? 4. Determine how to evaluate and assess BMP?	1. Continue to use spill management procedures and update as needed. 2. Procedures are through the Mahoning County Hazmat Department and the Coitsville Fire Department.

POLAND TOWNSHIP YEAR 2 ANNUAL REPORT
Table 1: Public Involvement/Participation Minimum Control Measure 1 & 2

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
1.1	Township Storm Water Management Committee	1. Attend County Storm Water Committee meetings 2. Key Township committee activities: ✓ Township Storm Water committee to develop schedule for BMP implementation.	1. Need to complete implementation schedule for SWMP- BMPs. 2. Severe flooding, in May and September 2004, federal disaster assistance was approved for citizens and local governments for Mahoning County. As a result of these events BMP and plan activity implementation was limited.	1. BMP 1.1 addresses permit sections 3.2.1.2.3 and 3.2.2.2.3.	1. Township storm water management committee members will continue to attend County Storm water committee meetings. 2. Township storm water management committee will perform the following activities in Year 3: ✓ Develop township BMP implementation schedule. ✓ Develop BMP table and determine responsible personnel for implementation, documentation and maintenance activities associated with BMP's. 3. Develop Contact plan for: ✓ Service Stations ✓ Commercial Properties ✓ Home Owners Association ✓ School properties 4. Determine how Township storm water BMP implementation, maintenance and support activities will tracked, collected and reported. 5. Determine how BMP will be evaluated and assessed.	1. Present completed BMP implementation schedule and contact plan to County Storm Water Committee. 2. Present BMP Implementation plan to required authority.

POLAND TOWNSHIP YEAR 2 ANNUAL REPORT
Table 1: Public Involvement/Participation Minimum Control Measure 1 & 2

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
1.2	Newsletters	<ol style="list-style-type: none"> 1. Mahoning SWCD Education Newsletter – 3 times per year during school year. 2. <i>Mahoning Matters</i>, a quarterly publication of Mahoning SWCD – distributed to 104,686 county residents. 3. <i>Pipeline</i> – published twice a year by County Sanitary Engineer – distributed to 44,000 households 	<ol style="list-style-type: none"> 1. <u><i>Mahoning Matters</i></u> – Title of Article printed in 2004. 2. <u><i>Pipeline</i></u>- Title of article printed in 2004. 	<ol style="list-style-type: none"> 1. BMP 1.2 addresses permit section 3.2.1.2.5. <p>Due to budget constraints within the county, the SWCD staff hours were reduced. The Education Specialist resigned; consequently, educational programs have been cut dramatically.</p>	<ol style="list-style-type: none"> 1. Assist in drafting information for <i>Mahoning Matters</i> article. 2. One update in the <i>Pipeline</i> per year will continue to be an objective in Year 3. 3. Document number of newsletters published. 	<ol style="list-style-type: none"> 1. Consult with agencies on marketing strategies to inform the public.
1.3	Publications	<ol style="list-style-type: none"> 1. Poland Town Crier – provided weekly <ul style="list-style-type: none"> ✓ Youngstown Vindicator ✓ Youngstown/Warren Regional Chamber of Review. 	<ol style="list-style-type: none"> 1. Township committee has given the Town Crier and the Vindicator the updates concerning the SWMP. 	<ol style="list-style-type: none"> 1. BMP 1.3 address permit sections 3.2.1.2.3 and 3.2.1.2.5. 	<ol style="list-style-type: none"> 1. Document updates/revisions to SWMP. 2. Develop methods to increase public involvement. 3. Make available additional printed info to public. 	<ol style="list-style-type: none"> 1. Continue to review and assess storm water program information received and update and make available to public at zoning office and town hall.

POLAND TOWNSHIP YEAR 2 ANNUAL REPORT
Table 1: Public Involvement/Participation Minimum Control Measure 1 & 2

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
1.4	Website	1. Continue to provide information relative to water quality and storm water management.	1. Provided information on the Township website dealing with water quality and storm management.	1. BMP 1.4 addresses permit section 3.2.1.5.2	1. Determine method to collect and post township storm water information on page. 2. Determine how to track, evaluate, assess and document BMP appropriateness. 3. Determine how to archive web page materials.	1. Provide additional water quality links and materials on page. 2. Determine and document schedule for updating web page materials.
1.5	Public Meetings	1. Township Trustee Meetings held twice monthly. 2. Continued working on township version of SWMP. 3. Township Trustee Meetings- Continued to address storm water issues- Year 2.	1. Public comment has been solicited by the Township Trustees involving public input and BMP.	1. BMP 1.5 addresses permit section 3.2.1.2.4, 3.2.1.2.6 and 3.2.2.2.2.	1. Complete township trustee SWMP presentation. 2. Continue to encourage public involvement related to storm water issues during Township Trustee meetings. 3. Develop a Public involvement plan for citizens to become involved the Townships storm water program. 4. Consider including a citizen on Township storm water committee (TSWC). 5. Determine pollutants TSWMC will target. 6. Determine how information for this BMP will be collected, tracked, documented and reported. 7. Determine how BMP will be evaluated and assessed.	1. Continue to seek public input on the implementation of the SMWP. 2. Present identified target pollutants to Township trustees and coordinate with County storm water committee to align goals and objectives.
1.6	Community Activities	1. <u>Green Team</u> a. Classroom and youth group presentations completed. Estimated number attended = 395 classroom presentations, estimated 9786 students. b. Teacher curriculum workshops completed. Estimated number of	1. <u>Green Team</u> a. Classroom presentations completed Year 2. b. Teacher curriculum completed Year 2. c. Waste Assessment criteria established and implemented Year 2. d. Tour/Field trips conducted in Year 2.	1. <u>Green Team</u> BMP 1.6 address permit sections 3.2.1.2.3, 3.2.1.2.5 and 3.2.2.2.4.	1. Develop efficient means for tracking and reporting recycled material collected. 2. Outline/Develop needs for annual community clean-up day. 3. <u>Green Team</u> a. Continue classroom	1. Begin to track amounts, report totals and assess and modify selected BMPs as necessary. 2. Set date and complete necessary procedural requirements for community clean up day.

POLAND TOWNSHIP YEAR 2 ANNUAL REPORT
Table 1: Public Involvement/Participation Minimum Control Measure 1 & 2

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
		<p>workshops = 6 An estimated 152 attendees.</p> <p>c. Waste assessment activities for small businesses completed. Estimated number of Business Assessed = 12 assessments conducted.</p> <p>d. Tours/Field Trips conducted. Type and number attended : Field Trip type – 11 held Attendance -</p> <p>e. Cooperative recycling Waste education programs to reduce litter. Summary of collection effort = 17,237 lbs.</p> <p>f. Special Collection Days: Collections: HHW =212,969 lbs. E-Collection =133,483 lbs. Appliance =265,680 lbs. Christmas Tree =93,725 lbs Christmas Wrap & Card =3,155 lbs Household Battery = 1200</p>	<p>e. Recycling program documented and performed in Year 2.</p> <p>f. Special collection days scheduled and held Year 2.</p>		<p>and youth group presentations and document attendance.</p> <p>b. Continue teacher curriculum workshops.</p> <p>c. Continue waste assessment activities for small businesses. Begin documentation of program goals, waste reduction documented and summary of programs.</p> <p>d. Continue scheduling Tours/Field Trips.</p> <p>e. Continue cooperative recycling and education programs to reduce litter. Record collected amounts.</p> <p>f. Continue Special Collection Days</p> <p>4. Determine how BMP will be evaluated and assessed.</p> <p>5. Document assessment rationale for reporting in.</p>	<p>3. <u>Green Team</u></p> <p>a. Estimated 350 classroom and youth group presentations.</p> <p>b. Estimated 4 teacher curriculum workshops</p> <p>c. Estimated 10 targeted waste assessment activities for small business.</p> <p>d. Estimated 5 targeted tours/ field trips</p> <p>e. Estimated 1 cash for cans, 2 school paper programs, 20 adopt - a - spot.</p> <p>f. Estimated 1 Household Hazardous Waste collection, 1 E collection, 1 Appliance collection, 1 Christmas tree collection, 1 Christmas wrap and card collection.</p>

POLAND TOWNSHIP YEAR 2 ANNUAL REPORT
Table 1: Public Involvement/Participation Minimum Control Measure 1 & 2

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
1.7	Brochures, Flyers, Factsheets, and Handouts	1. Township will make available at the Township Hall the following information available from County and other agencies and organizations: <ol style="list-style-type: none"> a. Handouts with building/zoning permits. b. Mahoning SWCD – <i>Mahoning Matters</i>. c. Mahoning SWCD – Conservation Car Wash Tips. d. Mahoning SWCD- Water Conservation, Why should you care? e. Ohio EPA – Protecting Ohio’s water. f. OSU Extension Fact Sheets related to Storm Water. g. Map of County watersheds and regulated areas. 	1. Collection and organization of information for public was made available at Town Hall facility. 2. Township Storm Water committee continued working w/ Mahoning County Storm water committee to develop/collect information for County and Township use.	1. BMP 1.7 address permit sections 3.2.1.2.3, 3.2.1.2.5 and 3.2.2.2.4.	1. Continue working w/ County Storm water committee to develop and contribute information to the following: <ul style="list-style-type: none"> • <i>Mahoning Matters</i> • District Board of Health- Mailer regarding HSTS information. • Mahoning County Green Team • Mahoning County SWCD. 2. Investigate developing more informative Township focused storm water brochure/fact sheet. 3. Determine how BMP will be evaluated and assessed. 4. Document assessment rationale for reporting	1. Continue to review and assess storm water program information received and update and make available to public at zoning office and town hall. 2. Determine tracking and documenting procedures. 3. Coordinate tracking and data recording needs with other SWMP BMPs.

POLAND TOWNSHIP YEAR 2 ANNUAL REPORT
Table 2: Illicit Discharge Detection and Elimination Plan Minimum Control Measure 3

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
3.1	Map storm sewer system	<ol style="list-style-type: none"> 1. Severe flooding, in May and September 2004, federal disaster assistance was approved for citizens and local governments for Mahoning County. Year 2 – System Mapping was rescheduled for Year 3. Mahoning County is considering several protocols for inventory along with the attributes collected. 2. Township will initiate storm sewer mapping activities in Year 3. 3. Township to coordinate storm sewer inventory with County inventory to standardized system attribute collection. 	<ol style="list-style-type: none"> 1. Severe flooding, in May and September 2004, federal disaster assistance was approved for citizens and local governments for Mahoning County. Year 2 – System Mapping was rescheduled for Year 3. 	<ol style="list-style-type: none"> 1. BMP 3.1 will address permit section 3.2.3.1.2 and 3.2.3.2.1 2. BMP Assessment here will be based on percent complete per year between Year 3 and Year 4. 	<ol style="list-style-type: none"> 1. Outline System inventory approach/sequence and schedule for system outfalls and Home Sewer Treatment System (HSTS) outfalls. Coordinate HSTS inventory with District Board of Health and Mahoning County Engineers office. 2. Develop inventory protocols. 3. Determine how and where outfall inventory will be stored or filed. 4. Determine how inventory data will be linked w/ County- GIS mapping to create “Storm Sewer Base Map”. 5. Determine system attributes to be collected. 6. Consider including “Simple” dry weather screening activities (Color, odor, presence of flow) which can be easily performed during inventory as a method to begin identification of potential illicit discharge locations. 	<ol style="list-style-type: none"> 1. Begin inventory. 2. Complete base map for use in inventory. 3. Document process (Protocol). 4. Draft revised completion schedule. 5. Address the Dry weather screening issue.

POLAND TOWNSHIP YEAR 2 ANNUAL REPORT
Table 2: Illicit Discharge Detection and Elimination Plan Minimum Control Measure 3

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
3.2	Develop program to detect and eliminate illicit discharges	1. Severe flooding, in May and September 2004, federal disaster assistance was approved for citizens and local governments for Mahoning County. Year 2 – System Mapping was rescheduled for Year 3. The Township will initiate storm sewer system mapping and inventory preparation activities in Year 3- scheduled completion date in permit Year 5.	1. Severe flooding, in May and September 2004, federal disaster assistance was approved for citizens and local governments for Mahoning County. Year 2 – System Mapping was rescheduled for Year 3. The Township will initiate storm sewer system mapping and inventory preparation activities in Year 3- scheduled completion date in permit Year 5.	1. BMP 3.2 addresses permit sections: ✓ 3.2.3.1.3 ✓ 3.2.3.1.4 ✓ 3.2.3.1.5 ✓ 3.2.3.2.2 ✓ 3.2.3.2.3 ✓ 3.2.3.2.4 ✓ 3.2.3.2.4.1 ✓ 3.2.3.2.4.2 ✓ 3.2.3.2.4.3 ✓ 3.2.3.2.4.4 2. Wastewater discharges that are identified during any inspection are required to be corrected to comply with Section 2 part C,D,E,F, & G of the Regulation of Household Sewage Disposal Systems. 3. Off-lot discharges are permitted for wastewater when an on-lot system can not be installed and the off-lot system is installed to comply with the Regulations of Household Sewage Disposal Systems Section 2 part G.	1. Begin development of Illicit Discharge Ordinance. Outline suggested enforcement procedures. (3.2.3.1.3 and 3.2.3.2.3). Develop draft schedule for implementation. 2. Develop preliminary Illicit Discharge Elimination Plan (IDEP). Plan should include procedures for detection and process for removal and reporting. IDEP should include schedule and implementation steps. (3.2.3.1.4, 3.2.3.2.2, 3.2.3.2.4) 3. Develop IDEP program fact sheet for public and employee use. (3.2.3.1.5) 4. Develop preliminary Dry Weather Screening Plan. (3.2.3.2.4.1 and 3.2.3.2.4.2). 5. Process for prioritizing “Hot Spot” areas. 6. Develop general procedures for removing identified illicit discharges. 7. Develop BMP evaluation/assessment criteria or procedures. Document status for annual report in Year 3. 7. Determine storage/file location of collected IDEP information/elimination data/follow up action- required or taken. 8. Determine how BMP will be evaluated and assessed. 9. Document assessment rationale for reporting.	1. Work with County engineer and Township Trustees to complete and obtain approval of Illicit Discharge Ordinance/regulation. 2. Work with County Sanitary Engineer, District Board of Health, Townships and Mill Creek Metroparks to draft both Illicit Discharge Ordinance language and to outline the IDEP program for the County. 3. Determine the following: ✓ Champion for IDEP program. ✓ Where IDEP will be filed and how will data be linked w/ County GIS. ✓ Determine whether the Dry Weather Screening will be performed during inventories. ✓ Complete schedule ✓ OEPA recommended 100 % dry weather screening be completed between Year 3 and Year 5. ✓ Draft NOV form. ✓ Evaluation process.

POLAND TOWNSHIP YEAR 2 ANNUAL REPORT
Table 2: Illicit Discharge Detection and Elimination Plan Minimum Control Measure 3

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
3.3	Adopt resolutions prohibiting illicit discharges	1. Began Ohio Revised Code (ORC) and Township authority research related to County authority to implement regulations related to illicit discharge.	1. Based on research results. Regulation/ordinance should include or address the following: <ul style="list-style-type: none"> ✓ Prohibition of Illicit discharges and illegal dumping. ✓ Enforcement ✓ Private property access for investigative purposes to determine illicit source ✓ First offense warning-NOV. 	1. See BMP 3.2 for permit sections.	1. Complete review/research. See BMP 3.2 for sequence details. 2. Draft summary of findings document. 3. Prepare draft Illicit Discharge regulation including: <ul style="list-style-type: none"> 1. Prohibition of Illicit discharges and illegal dumping. 2. Enforcement 3. Private property access for investigative purposes to determine illicit source. 4. First offense warning-NOV. 4. Determine how BMP will be evaluated and assessed. 5. Document assessment rationale for reporting.	1. Present Draft Illicit Discharge regulation to Township Storm water committee for review and comment. 2. Revise regulation based on comments. 3. Schedule meeting w/ Township Trustees to present draft regulation. 4. Follow through regulation adoption process to achieve passage of draft regulation(s).

POLAND TOWNSHIP YEAR 2 ANNUAL REPORT
Table 2: Illicit Discharge Detection and Elimination Plan Minimum Control Measure 3

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
3.4	<p>Total Maximum Daily Load (TMDL) (Ohio EPA Permit Section 1.3.6) County and Township procedures should be able to demonstrate how they determined the amount of pollutant needed to be reduced within the impaired stream segment(s), and how much pollutant was reduced (i.e., water sampling to verify the amounts removed).</p>	<p>1. Table completed identifying Approved and pending TMDLs within Ohio.</p>	<p>1. County's consultant currently has a system in place to identify the TMDL watersheds located throughout the county. 2. Began development of regulated areas which overlay on top of TMDL watershed. Table includes approved and pending approval TMDLs only.</p>	<p>1. BMP 3.5 addresses permit section 1.3.6. 2. OEPA Construction General Permit.</p>	<p>1. Provide information/assistance for Mahoning County to complete TMDL layer development for the storm water Base Map. 2. Provide assistance to assist Mahoning County with completing TMDL table. Table will include the following: ✓ TMDL HUC code and stream name. ✓ General Description of location. ✓ Summary of causes and sources. 3. Investigate and document Township potential sources as identified in TMDL. 4. Document all assumptions made during potential source assessments. 5. Assist through Township Storm Water Management Committee with drafting outline of process to be developed in Year 5 of permit term which preliminary procedures to be implemented to address identified sources on a planning and project basis. 6. Determine how BMP will be evaluated and assessed. 7. Document assessment rationale for reporting.</p>	<p>1. Present map and table to Township storm water management committee and Township Trustees for review and comment. 2. Review updated Mahoning County Drainage Manual for potential edits based on completed mapping and tables.</p>

POLAND TOWNSHIP YEAR 2 ANNUAL REPORT

Table 3: Construction Site Storm Water Control Plan Minimum Control Measure 4

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
4.1	Adopt erosion and sediment control zoning resolutions	1. Mahoning County Engineers office and Mahoning County Soil and Water Conservation District completed development of <i>Mahoning County Drainage and Sediment Control Manual- Year 2 (2004)</i> . Manual includes: <ul style="list-style-type: none"> ✓ Drainage Design and Engineering ✓ Storm Drainage Systems ✓ Post-Construction Storm Water Management Requirements ✓ Storm Water Pollution Prevention plans and Erosion and sediment Control Requirements ✓ Current Flood Plain Regulations. 	1. Mahoning County has developed E&SC Regulations. The E&SC Regulations are included in the revised and updated <i>Mahoning County Drainage and Sediment Control Manual</i> . 2. Resolution from the Mahoning County Commissioners adopting the revised/updated Drainage Criteria and Erosion & Sediment Control Manual will be in place spring 2005.	1. BMP 4.1 Addresses permit sections: <ul style="list-style-type: none"> ✓ 3.2.4.1.1 ✓ 3.2.4.1.2 ✓ 3.2.4.1.3 ✓ 3.2.4.1.4 ✓ 3.2.4.1.6 ✓ 3.2.4.2.1 ✓ 3.2.4.2.2 ✓ 3.2.4.2.3 2. OEPA Construction General Permit (CGP).	1. Review current Township regulations/resolutions governing Erosion and Sediment Control. 2. Determine necessary modifications to current resolution/regulation in order to adopt <i>Mahoning County Drainage and Erosion and Sediment Control Manual</i> as the Township design manual. 3. Identify potential areas of Manual which from the Township perspective may need to be updated to fit Township requirements. 4. Implement the new requirements contained within the revised/updated Drainage Criteria and Erosion & Sediment Control Manual.	1. Mahoning County will provide updates/revisions to the Manual periodically based on reviews of actual Manual concepts implemented in the field. 2. Mahoning County will consider Manual user suggestions and feedback on improving Manual content and applicability. 3. Support Mahoning County in conducting Manual workshops.

POLAND TOWNSHIP YEAR 2 ANNUAL REPORT

Table 3: Construction Site Storm Water Control Plan Minimum Control Measure 4

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
4.2	Workshops on E&SC Resolutions	1. SWCD held multiple site specific workshops and presentations related to Erosion and Sediment Control.	1. Significant time and effort by SWCD went into the preparation of the soon to be adopted Mahoning County E&SC Regulations.	1. See BMP 4.1 for permit sections.	1. 2 – Half-day workshops will be scheduled in connection with how to use the updated manual. 2. TSWC will develop and provide an estimated 2 workshops on erosion and sediment control BMPs in Year 3. Content includes - How to comply with the revised resolutions and how to use the updated manual? 3. Assist County SWMC with developing County and Township relevant Storm water fact sheets. 4. Develop method to track and document workshop attendance. 5. Develop a schedule for completing workshop material and also a schedule for updating workshop materials.	1. Publish workshop on web page. 2. Complete workshop material development.
4.3	Enter into Memorandum of Understanding (MOU) with Mahoning SWCD	1. MOU Review and update to be completed in Year 2. 2. Mahoning County SWCD will continue delegating services in relation to Storm Water Plan Compliance.	1. MOU developed and signed between SWCD and the Mahoning County Engineer's Office, outlining cooperative duties/services provided by each entity.	1. BMP 4.3 addresses permit sections 3.2.4.2.2 and 3.2.4.3.4.	1. Review MOU language and update as necessary throughout Year 3.	1. Document MOU changes as necessary.

POLAND TOWNSHIP YEAR 2 ANNUAL REPORT

Table 3: Construction Site Storm Water Control Plan Minimum Control Measure 4

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
4.4	<p>Review Erosion & Sediment Control plans/Storm Water Pollution Prevention Plans (SWPPP)</p> <p>Note: BMP name change.</p>	<ol style="list-style-type: none"> Continue to work with the Townships and Building Departments to provide support for site erosion/sediment reviews. Current plan process: <ul style="list-style-type: none"> ✓ Townships review site plans. ✓ Engineer reviews site plans (Springfield Twp.). ✓ SWCD reviews SWPPP and Erosion and Sediment Control plans. 	<ol style="list-style-type: none"> SWCD reviews residential (sub-division) and other projects requiring submission of E/S plans. The updated manual did not change the plan review process. Continue to work with County Engineer, SWCD and Building Departments to provide support for site erosion/sediment reviews. 	<ol style="list-style-type: none"> BMP 4.4 addresses permit section 3.2.4.1.4. 	<ol style="list-style-type: none"> Poland Township will adopt the Erosion and Sediment Control regulations contained within the <i>Mahoning County Drainage and Erosion and Sediment Control Manual</i>. SWCD will work w/ Mahoning County Engineers office to update website with E&SC Requirements (including checklists). Develop Method to track and document number reviewed. Determine how BMP will be evaluated and assessed. Document assessment rationale for reporting. 	<ol style="list-style-type: none"> Track number of plans reviewed for E/S controls. Document date E/S checklist placed on web page. Document Township adoption of E&SC Regulations. Coordinate program elements which need tracking w/ County program tracking needs. Determine benefit of leveraging similar tracking requirements.
4.5	<p>Construction debris collection and disposal</p>	<ol style="list-style-type: none"> SWCD ES&C plan checklist includes Construction Debris Collection and Disposal. 	<ol style="list-style-type: none"> Erosion and Sediment Control site inspection checklist was modified in Year 2 to include Construction debris and disposal. Year 3- will focus on investigating methods to collect and document volumes of Construction debris removed and disposed of properly. 	<ol style="list-style-type: none"> BMP 4.5 addresses permit section 3.2.4.2.3. 	<ol style="list-style-type: none"> Develop standards for appropriate on-site collection systems/containers. Develop appropriate site locations for placing containers. Develop disposal procedures, frequency of pick up and potential secondary containment requirements. Draft resolutions which will allow for enforcement of non-compliance. Develop site inspection requirements and include in Zoning inspectors cross-raining (See BMP 4.4). Determine how BMP will be evaluated and assessed. Document assessment rationale for reporting. 	<ol style="list-style-type: none"> SWCD to continue to inspect/evaluate active construction sites, using county enforcement abilities as they are developed. SWCD will track inspections with Urban Site Program (ACCESS database). Using Urban Site Program method to track sites and document violations. Collect quantitative information on volumes and number of violations and corrections for reporting.

POLAND TOWNSHIP YEAR 2 ANNUAL REPORT

Table 3: Construction Site Storm Water Control Plan Minimum Control Measure 4

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
4.6	<p>Inspect active sites SWCD will continue inspect active construction sites.</p>	<ol style="list-style-type: none"> SWCD – continued with current construction site inspection program. Began implementation Urban Site Program Database tracking system. 	<ol style="list-style-type: none"> Active construction sites are inspected/evaluated against compliance conditions set forth in OEPA's Construction General Permit. Inspections are tracked with Urban Site Program (ACCESS database). 	<ol style="list-style-type: none"> BMP 4.6 addresses permit section 3.2.4.1.6 Inspections provided local impetus for compliance with terms of NPDES/Construction storm water permit. 	<ol style="list-style-type: none"> SWCD – continue with current construction site inspection program. Develop method to collect and present data from Urban site Program for reporting purposes. Determine data presentation format. Determine Inspection frequency/schedule. OEPA SWMP comment indicated minimum of once per month. Determine how BMP will be evaluated and assessed. Document assessment rationale for reporting 	<ol style="list-style-type: none"> Report out data from Urban Site Program. Number of sites. Summary of recurring violations. Modify E/S controls if necessary to reduce recurring inspection noted deficiencies.
4.7	<p>Enforcement actions</p>	<p>Poland Township will adopt <i>Mahoning County Drainage and Erosion and Sediment Control Manual</i>, by adopting the manual the following applies:</p> <ol style="list-style-type: none"> Mahoning County Engineers office and Mahoning County Soil and Water Conservation District completed development of <i>Mahoning County Drainage Erosion and Sediment Control Manual- Year 2 (2004)</i>. Review other County-E/S enforcement requirements/regulations during development of the updated manual. Notice of Violation form implemented to notify developers/contractors of major non-compliances. 	<ol style="list-style-type: none"> Review and track enabling legislation for additional enforcement as passed by the State Legislature. Mahoning County E&SC Regulations will be amended as legislation continues to change. 	<ol style="list-style-type: none"> BMP 4.7 addresses permit section 3.2.4.2.6 Commissioners will be urged to adopt a resolution allowing the use HB 411 to enable County to enforce regulations. 	<ol style="list-style-type: none"> Implement new requirements contained in the updated Drainage and Sediment and Erosion Control Manual. Determine fee structure for NOV and re-inspection fee. Re-inspection fees after 3 consecutive NOV's will be implemented. Determine method to track, record and document Inspections and enforcement actions taken. Determine how BMP will be evaluated and assessed. Document assessment rationale for reporting. Develop method/enforcement mechanism that zoning inspector can issue stop work order. Coordinate w/ County prosecutor as necessary. 	<ol style="list-style-type: none"> Mahoning County will provide updates/revisions to the Manual periodically based on reviews of actual Manual concepts implemented in the field. Mahoning County will consider Manual user suggestions and feedback on improving Manual content and applicability.

POLAND TOWNSHIP YEAR 2 ANNUAL REPORT

Table 3: Construction Site Storm Water Control Plan Minimum Control Measure 4

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
4.8	Respond to public complaints regarding construction activities	1. Began process of establishing a contact number for public feedback/complaints. 2. Current system in place under Year 2 – Direct complaints to SWCD.	1. Current mechanism in place is to direct complaints through SWCD.	1. BMP 4.8 addresses permit section 3.2.4.2.5.	1. Develop and publish call in number for water quality, construction site pollution complaints. 2. Develop method to track and document complaints. 3. Tracking will allow for follow up and documentation of complaint resolution. 4. Determine how BMP will be evaluated and assessed. 5. Document assessment rationale for reporting. 6. Poland Township will advertise through newsletter and web site, a phone number for residents concerned about specific construction activities.	1. Establish call in number. 2. Determine tracking and documenting procedures.
4.9	Concrete Truck Wash Out	1. Concrete Truck Wash Out procedures and locations were identified in the updated drainage and erosion and sediment control manual.	1. Checklist developed includes requirements for concrete truck wash-out. 2. CGP was used to develop procedures and text for this BMP. 3. Regulations have been adopted and will be included as addendums to the updated drainage regulations.	1. BMP 4.9 addressed permit section 3.2.4.1.3. 2. E&SC plans are required to designate procedures for concrete truck wash-out.	1. Develop standard drawing for BMP. 2. Document violations and corrections at sites. 3. Determine method to track and document violations and corrective action. 4. Determine how BMP will be evaluated and assessed. 5. Document assessment rationale for reporting.	1. Continue to use the existing checklist, allowing for revisions as deemed necessary. 2. Develop means to track number of corrections based on inspections.

POLAND TOWNSHIP YEAR 2 ANNUAL REPORT

Table 3: Construction Site Storm Water Control Plan Minimum Control Measure 4

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
4.10	Construction Site Ingress/Egress	1. Ingress/Egress BMP procedures were addressed in the updated drainage and erosion and sedimentation control manual.	1. Checklist developed includes requirements for site ingress/egress protection. 2. CGP was used to develop procedures and text for this BMP. 3. Regulations have been adopted and will be included as addendums to the updated drainage regulations.	1. BMP 4.10 addressed permit section 3.2.4.1.3. 2. E&SC plans are required to designate procedures for Construction Site ingress/egress.	1. Continue to use the existing checklist, allowing for revisions as deemed necessary. 2. Document violations and corrections at sites. 3. Determine how BMP will be evaluated and assessed. 4. Document assessment rationale for reporting. 5. Determine how to track workshop attendance and update workshop materials as necessary.	1. Continue to use the existing checklist, allowing for revisions as deemed necessary. 2. Develop means to track number of corrections based on inspections.

POLAND TOWNSHIP YEAR 2 ANNUAL REPORT
Table 4: Post-Construction Storm Water Minimum Control Measure 5

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
5.1	Workshops for Post-Construction Regulations Note: BMP name change	1. SWCD held multiple site specific workshops and presentations related to Erosion and Sediment Control. 2. 2 – Half-day workshops will be scheduled in connection with how to use the updated manual. 3. Complete updates to Drainage and Sediment and Erosion Control Manual, which included Post-Construction BMP's. Note: Workshops for Year 2 were sediment/Erosion control focused.	1. Significant time and effort by SWCD went into the preparation of the soon to be adopted Mahoning County E&SC Regulations. Note: Year 3- workshops will be modified to accommodate Post-Construction Controls.	1. BMP 5.1 addresses permit section 3.2.5.2.3.3. 2. Construction General Permit.	1. Develop materials and schedule a minimum of 2 workshops focused on Mahoning County's Post-Construction BMP's. 2. Develop schedule to perform reviews and updates of workshop materials. 3. Determine how BMP will be evaluated and assessed. 4. Document assessment rationale for reporting. 5. Determine how to track workshop attendance and update workshop materials as necessary.	1. Investigate and identify location or sources that developers, contractors, engineers, builders and public can go to access information on Post-Construction storm water management BMP's.
5.2	Riparian and Wetland setbacks	1. Until the various township zoning codes and the building code are amended, the County will continue to encourage development that will maintain or improve water quality.	1. Model Riparian zoning ordinances are expected to be completed during Year 3.	1. BMP 5.2 addresses permit section 3.2.5.2.3.1	1. Work to complete Zoning regulations dedicated to riparian zone setbacks. 2. Work with County Engineer to track successes. 3. Document lessons learned from implementing regulations.	1. Revise the existing zoning ordinances to include the model zoning ordinances.

POLAND TOWNSHIP YEAR 2 ANNUAL REPORT
Table 4: Post-Construction Storm Water Minimum Control Measure 5

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
5.3	<p>Post-Construction Storm Water Management Resolutions- See County table BMP 5.1.</p> <p>Note: By reference this BMP covers BMP's 5.1.1 through 5.1.6 addressed in detail in the county Post-Construction MCM table. (Structural and Non-Structural).</p>	<ol style="list-style-type: none"> 1. Mahoning County Engineers office and Mahoning County Soil and Water Conservation District completed development of <i>Mahoning County Drainage and Sediment Control Manual- Year 2 (2004)</i>. 2. Section 4.4 in the updated Drainage manual addresses this BMP with supporting schematic drawings. 3. County Engineer held a public comment period for the Manual as required by ORC. Comments were incorporated into the manual prior to final edits and presentation to County commissioners. 	<ol style="list-style-type: none"> 1. A resolution from the Mahoning County Commissioners adopting the revised/updated Drainage Criteria and Erosion & Sediment Control Manual will be in place by April 2005. 	<ol style="list-style-type: none"> 1. BMP 5.3 addresses permit sections: <ol style="list-style-type: none"> 2. 3.2.5.2.4 3. 3.2.5.2.4.2 4. 3.2.5.2.4.3 2. OEPA Construction General Permit (CGP): <ul style="list-style-type: none"> ✓ Post-Construction Section – Part III.G.2.e 	<ol style="list-style-type: none"> 1. Determine method to track BMPs installed for maintenance purposes. 2. Develop BMP maintenance document. 3. Investigate value in developing a GIS layer to locate these on storm water base map. 4. Investigate and establish BMP measurable goals for reporting and evaluation. 5. Determine evaluation or assessment methods to determine appropriateness. 6. Document evaluation rationale for reporting. 	<ol style="list-style-type: none"> 1. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools/aids to assist with tracking/reporting. 2. Develop and identify BMP maintenance needs and responsible personnel. 3. Consider developing BMP maintenance manual. OEPA SWMP comment recommends minimum inspection frequency of 1x annually. (See BMP 5.3)

POLAND TOWNSHIP YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 6

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
6.1	Operation and maintenance program to prevent or reduce storm water pollution from community operations.	1. Current facilities comply with all local state and federal regulations for storm water management.	1. Due to new garage and office facilities many BMP are already in place. 2. Committee working on written operation and maintenance procedures.	1. BMP 6.1 addresses permit section 3.2.6 through 3.2.6.2.5	1. Complete development of operations and maintenance procedures for manual. 2. Develop O/M training materials. 3. Document number attended, date, topics. 4. Determine how O/M procedures will be evaluated and assessed. 5. Document assessment rationale for reporting.	1. Begin to implement completed Operation and Maintenance procedures related to storm water pollution reduction. 2. Determine how to collect and record information for reporting purposes. 3. Coordinate program elements which need tracking w/ County program tracking needs. Determine benefit of leveraging similar tracking requirements. 4. Consider developing BMP maintenance manual. OEPA SWMP comment recommends minimum inspection frequency of 1x annually. (See BMP 5.3)

POLAND TOWNSHIP YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 6

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
6.2	Staff education program on pollution prevention	<ol style="list-style-type: none"> 1. Draft outline of education program complete review of other training/education models for Township. 2. Develop schedule of training/education. 	<ol style="list-style-type: none"> 1. Staff currently attending SWCD training and in house training. 	<ol style="list-style-type: none"> 1. BMP 6.2 addresses permit section 3.2.6.1.1 and 3.2.6.1.2. 	<ol style="list-style-type: none"> 1. Identify potential pollution sources/pollution types per maintenance activity to better focus training and O/M practices on. 2. Identify areas/practices/procedures that could be updated and incorporate water quality elements. 3. Develop training schedule and materials based on review of O/M review and focus training on target audience. 4. Determine evaluation or assessment methods to determine BMP appropriateness or effectiveness. 5. Determine methods to track and organize training attendees, when training materials need to be updated and reporting needs. 	<ol style="list-style-type: none"> 1. Present education outline to Township and County Storm Water Committees. 2. Outline training materials need and develop schedule to develop, secure and build training program. OEAP SWMP comment- Recommends 1x year to hold training. 3. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools/aids to assist with tracking/reporting.
6.3	Street Sweeping	<ol style="list-style-type: none"> 1. Develop method to report quantities collected. 2. Draft sweeping schedule and procedures. Post on county web page schedule. 	<ol style="list-style-type: none"> 1. Records of quantities are as follows: <ul style="list-style-type: none"> ✓ 110 c.u. spring sweep ✓ 28 c.u. fall sweep ✓ 18 c.u. after storm events 	<ol style="list-style-type: none"> 1. BMP 6.3 addresses permit sections: <ul style="list-style-type: none"> ✓ 3.2.6.2.1 ✓ 3.2.6.2.3.1 ✓ 3.2.6.2.3.2 ✓ 3.2.6.2.3.3 ✓ 3.2.6.2.3.4 ✓ 3.2.6.2.4 ✓ 3.2.6.2.5 	<ol style="list-style-type: none"> 1. Draft sweeping schedule and procedures. Tie protocols/procedures to training being developed in 6.2. Post on county web page schedule. 2. Develop forms to record quantity of street sweepings collected. 3. Determine evaluation or assessment methods to determine BMP appropriateness or effectiveness. 4. Develop system to track and store collected information for reporting purposes. 	<ol style="list-style-type: none"> 1. Perform and record street sweeping activities- number of miles, amount collected. 2. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools/aids to assist with tracking/reporting.

POLAND TOWNSHIP YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 6

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
6.4	Litter Pickup	<ol style="list-style-type: none"> 1. Draft process to collect and report quantities data on trash collected. 2. Draft method to track and report. 	<ol style="list-style-type: none"> 1. Mahoning County Green Team operates litter pick up in the township. 2. Documentation of quantity unknown. 	BMP 6.4 addresses permit section 3.2.6.2.3.2	<ol style="list-style-type: none"> 1. Draft procedures to collect and report quantities of trash collected. Develop forms as necessary to track collections. 2. Draft method to track and report. 3. Determine evaluation or assessment methods to determine BMP appropriateness or effectiveness. 	<ol style="list-style-type: none"> 1. Hold or coordinate litter pickup(s) and document amounts collected. 2. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools/aids to assist with tracking/reporting.
6.5	Salt Storage and Applications	Salt is stored in a manner that prohibits drainage to surface water.	<ol style="list-style-type: none"> 1. Poland Township has completed a new salt facility in the year 2003. When not in use all salt is stored under roof. 2. Twelve hundred tons of salt has currently been used in the 2004-2005 winter. 3. All spills are cleaned up at the loading areas and on the streets as needed. 	1. BMP 6.5 addresses permit sections: ✓ 3.2.6.2.1 ✓ 3.2.6.2.3.1 ✓ 3.2.6.2.3.2 ✓ 3.2.6.2.3.3 ✓ 3.2.6.2.3.4 ✓ 3.2.6.2.4 ✓ 3.2.6.2.5	<ol style="list-style-type: none"> 1. Conduct drainage survey of all storage facilities (Salt storage, material storage, by-product storage, spoil storage, liquid storage and secondary containment storage, etc.). 2. Document findings and determine method to prioritize locations in need of modifications or upgrades. 3. Develop written clean up procedures. 4. Draft salt storage procedures. 5. Document application procedures and procedures for clean up if excess salt is applied or a salt spill occurs. 6. Track and evaluate the BMP and document effectiveness. 7. Determine how to evaluate/assess modifications and post event clean up activities or procedures. 	<ol style="list-style-type: none"> 1. Modify drainage system if necessary. 2. Implement developed and documented clean up procedures, salt storage procedures and application procedures. 3. Record total de-icing material used annually. 4. Complete storage facility drainage/outfall inventory. 5. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools/aids to assist with tracking/reporting.

POLAND TOWNSHIP YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 6

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
6.6	Mowing Practices	1. Review in field fueling practices. 2. Began documentation of staff practices related to clean fueling and mowing practices.	1. Current mowing procedures seem to be sufficient.	BMP 6.6 addresses permit section 3.2.6.2.3.1	1. Document in field fueling practices and other mowing operations practices with staff before cutting season. 2. Develop method to track personnel provided training. 3. Develop method to evaluate BMP effectiveness for report. 4. Investigate water quality value of modifying current mowing height.	1. Continue to practice clean in field fueling practices and other mowing practices. 2. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools/aids to assist with tracking/reporting.
6.7	Storm Water System Maintenance	1. Due to limited manpower the township inspects and cleans one half of its catch basins yearly. 2. Ditches are maintained as needed and inspections are done periodically.	1. Curb policies have proven to be successful.	1. BMP 6.7 addresses permit sections: ✓ 3.2.6.2.1 ✓ 3.2.6.2.3.1 ✓ 3.2.6.2.3.2 ✓ 3.2.6.2.3.3 ✓ 3.2.6.2.3.4 ✓ 3.2.6.2.4 ✓ 3.2.6.2.5	1. Develop documented procedures and standards for cleaning and disposing of spoil materials. 2. Document current catch basin and ditch maintenance and inspection program and schedule. 3. Develop Checklist to assist with documentation of catch basins cleaned and linear footage of ditches cleaned/maintained. 4. Develop method to evaluate BMP effectiveness for reporting.	1. Continue the current catch basin and ditch maintenance and inspection program. 2. Present draft procedures to TSWMC for comment. 3. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools/aids to assist with tracking/reporting.
6.8	Storage of construction materials and disposal of spoil	1. Committee still reviewing storage facility options and will continue to monitor debris removal from township facility. 2. Track and record the amount and type of debris disposed of. Lbs. of soil. Lbs. of stone. Lbs. of other	1. Procedure proven to be successful.	BMP 6.8 addresses permit section 3.2.6.2.3.3	1. Draft storage and disposal procedures or modifications. 2. Develop method to record amount and type of debris disposed of as follows: • Lbs. of soil. • Lbs. of stone. • Lbs. of other. 3. Develop method to track personnel provided training. 4. Develop method to evaluate BMP effectiveness for report.	1. Modify current storage practice of bulk materials based on review. 2. Begin to record amount and type of debris disposed of. 3. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools/aids to assist with tracking/reporting.

POLAND TOWNSHIP YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 6

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
6.9	Fleet Maintenance	1. Tracking procedure is in the development stage. Truck washing working well with the design of our maintenance facility.	1. Truck washing working well with the design of our maintenance facility.	1. BMP 6.9 addresses permit sections: ✓ 3.2.6.2.1 ✓ 3.2.6.2.3.1 ✓ 3.2.6.2.3.2 ✓ 3.2.6.2.3.3 ✓ 3.2.6.2.3.4 ✓ 3.2.6.2.4 ✓ 3.2.6.2.5	1. Develop vehicle fluid recycling form to begin documentation of amounts of vehicle fluids recycled and disposed of. 2. Draft Inside Trap cleaning frequency and procedures. 3. Track and evaluate BMP and document effectiveness. 4. Draft Fleet vehicle washing procedures and location requirements for performing vehicle washing.	1. Outside contractor has been hired for removal. 2. Document amount of vehicle fluids recycled and disposed of. 3. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools/aids to assist with tracking/reporting. 4. Begin documentation of any facility drainage modifications related vehicle washing or floor drain reconnection or relocation.
6.10	Recycling/Separation/Disposal	1. Township will interact with Green Team and attempt to obtain Township quantities from the Green Team.	1. Permit compliance condition meet with coordination w/Green team for this BMP.	1. BMP 6.10 addresses permit sections: ✓ 3.2.6.2.1 ✓ 3.2.6.2.3.1 ✓ 3.2.6.2.3.2 ✓ 3.2.6.2.3.3 ✓ 3.2.6.2.3.4 ✓ 3.2.6.2.4 ✓ 3.2.6.2.5	1. Develop procedures to document collected amounts of: ✓ Oil +other vehicle fluids ✓ Tires 2. Develop form to assist with tracking and evaluation of BMP effectiveness. 3. Develop method to track and report quantities.	1. Township to continue to work with Green Team for this BMP. 2. Begin to document the quantities of materials recycled/reused/disposed of. 3. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools/aids to assist with tracking/reporting.

POLAND TOWNSHIP YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 6

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
6.11	Oil / Water Separators	1. Township does not have Water Separators, floor drains in the service Maintenance Building are tied into the sanitary sewer.	1. Township does not have Water Separators, floor drains in the service Maintenance Building are tied into the sanitary sewer.	1. BMP 6.11 addresses permit sections: ✓ 3.2.6.2.1 ✓ 3.2.6.2.3.1 ✓ 3.2.6.2.3.2 ✓ 3.2.6.2.3.3 ✓ 3.2.6.2.3.4 ✓ 3.2.6.2.4 ✓ 3.2.6.2.5	1. Develop method and form to track and record frequency of maintenance and amount of spoil removed. 2. Track, evaluate and report number cleaned, lbs. of spoil collected and determine how to assess effectiveness of BMP.	1. Begin to develop maintenance and documentation procedures. 2. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools/aids to assist with tracking/reporting.
6.12	Spill Management Procedures	1. Program is being developed in conjunction with Western Reserve Fire District.	1. Program in place is currently the jurisdiction of the Western Reserve Joint Fire District.	1. Program in place is currently the jurisdiction of the Western Reserve Joint Fire District.	1. Continue to review spill management procedures and update as needed. 2. Determine with assistance from Township Fire Department how to document number of Spill responses during permit year? 3. Investigate benefit developing Spill incident storm water system base map? 4. Determine how to evaluate and assess BMP?	1. Continue to assess program policies. Begin program to document amount of vehicle fluids recycled and disposed of. Track and evaluate BMP and document effectiveness. 2. Present plan to Township Storm Water Committee

SPRINGFIELD TOWNSHIP YEAR 2 ANNUAL REPORT
Table 1: Public Involvement/Participation Minimum Control Measure 1 & 2

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
1.1	Township Storm Water Management Committee	<ol style="list-style-type: none"> Attend County Storm Water Committee meetings. Township Storm Water Management Committee (TSWMC) meet regularly in Year 2. Committee make up- 1- pr more Township Trustees, Selected Department heads and 1- resident. 	<ol style="list-style-type: none"> Representative attended storm water committee meeting. 	<ol style="list-style-type: none"> BMP 1.1 addresses permit sections 3.2.1.2.3 and 3.2.2.2.3. 	<ol style="list-style-type: none"> Develop BMP implementation schedule with the TSWMC. Contact businesses for information regarding storm water discharges. Continue holding TSWCM and attending County Storm Water Management Committee Meetings. Determine how to collect and organize storm water information from local businesses. Determine method to evaluate business storm water information. Investigate need to develop form to organize and track business storm water information. .Determine how BMP will be evaluated and assessed. 	<ol style="list-style-type: none"> Township storm water management committee members will continue to attend County Storm water committee meetings. Recommend TSWMC perform the following activities in Year 3: <ul style="list-style-type: none"> ✓ Develop township BMP implementation schedule. ✓ Develop BMP table and determine responsible personnel for implementation, documentation and maintenance activities associated with BMP's. Develop Contact plan for: <ul style="list-style-type: none"> ✓ Service Stations ✓ Commercial Properties ✓ Home Owners Association ✓ School properties
1.2	Newsletters	<ol style="list-style-type: none"> <u>Mahoning Matters</u>: Quarterly publication of Mahoning SWCD – distributed to 104,686 county residents. <u>Pipeline</u> – published twice a year by County Sanitary Engineer – distributed to 44,000 households. Mahoning SWCD Education Newsletter – 3 times per year during school year. 	<ol style="list-style-type: none"> Articles were printed in township newsletter and Mahoning Matters. TSWMC will continue to draft and submit Township storm water articles for publication. 	<ol style="list-style-type: none"> BMP 1.3 addresses permit section 3.2.1.2.5. <p>Due to budget constraints within the county, the SWCD staff hours were reduced. The Education Specialist resigned; consequently, educational programs have been cut dramatically.</p>	<ol style="list-style-type: none"> Assist in drafting information for <i>Mahoning Matters</i> article. One update in the <i>Pipeline</i> per year will continue to be an objective in Year 3. Document number of newsletters published. 	<ol style="list-style-type: none"> Include Mahoning SWCD Newsletter and Mahoning Matters reach all residents. Collect copies of both articles.

SPRINGFIELD TOWNSHIP YEAR 2 ANNUAL REPORT
Table 1: Public Involvement/Participation Minimum Control Measure 1 & 2

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
1.3	Public Meetings	<ol style="list-style-type: none"> 1. Township Trustee Meetings held twice monthly. 2. Continued working on township SWMP elements. 3. Township Trustee Meetings- Continued to address storm water issues- Year 2. 	<ol style="list-style-type: none"> 1. TSWMC will complete the township version of the SWMP will be complete in Year 3. 	<ol style="list-style-type: none"> 1. BMP 1.3 addresses permit section 3.2.1.2.4, 3.2.1.2.6 and 3.2.2.2.2. 2. Notices for meetings appear in local newspapers. And township newsletters 	<ol style="list-style-type: none"> 1. Complete township SWMP BMP implementation. 2. Continue to encourage public involvement related to storm water issues during Township Trustee meetings. 3. Develop a Public involvement plan for citizens to become involved the Townships storm water program. 4. Determine pollutants TSWMC will target. 5. Determine how information for this BMP will be collected, tracked, documented and reported. 6. Determine how BMP will be evaluated and assessed. 	<ol style="list-style-type: none"> 1. Speak at Board of Education Meeting for BMP. 2. Continue to seek public input on the implementation of the SMWP. 3. Present identified target pollutants to Township trustees and coordinate with County storm water committee to align goals and objectives.

SPRINGFIELD TOWNSHIP YEAR 2 ANNUAL REPORT
Table 1: Public Involvement/Participation Minimum Control Measure 1 & 2

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
1.4	Community Activities	1. <u>Green Team Summary:</u> a. Cooperative recycling Waste education programs to reduce litter. Summary of collection effort = 17,237 lbs. b. Special Collection Days: Collections: HHW =212,969 lbs. E-Collection =133,483 lbs. Appliance =265,680 lbs. Christmas Tree =93,725 lbs Christmas Wrap & Card =3,155 lbs Household Battery = 1200. 2. Spring Clean up – May 2004. 3. Tire Recycle Program – 2,804.	1. Adopt-A-Mile: Road Spring cleanup enlisted many “Adopt a Mile” supporters. Springfield Township will review Beaver Township Adopt-A-Mile program. 2. Initial Spring cleanup estimates: Five (5) dumpsters of trash were collected, including 414 bags from cleaning of road side ditches in 2004. Program documented 145 volunteers.	1. BMP 1.4 address permit sections 3.2.1.2.3, 3.2.1.2.5 and 3.2.2.2.4.	1. Develop efficient means for tracking and reporting recycled material collected. 2. Develop and outline program needs for Annual Community Clean up Day. 3. Develop schedule to complete tracking and reporting needs. 4. Determine method to evaluate and assess BMP. 5. Determine rationale for reporting. 6. Determine next steps and level of effort to implement Adopt-A-Mile program.	1. Begin to track amounts, report totals and assess and modify selected BMPs as necessary. 2. Set date and complete necessary procedural requirements for community clean up day. 3. <u>Green Team</u> a. Estimated 350 classroom and youth group presentations. b. Estimated 4 teacher curriculum workshops c. Estimated 10 targeted waste assessment activities for small business. d. Estimated 5 targeted tours/ field trips e. Estimated 1 cash for cans, 2 school paper programs, 20 adopt - a - spot. f. Estimated 1 Household Hazardous Waste collection, 1 E collection, 1 Appliance collection, 1 Christmas tree collection, 1 Christmas wrap and card collection.

SPRINGFIELD TOWNSHIP YEAR 2 ANNUAL REPORT
Table 1: Public Involvement/Participation Minimum Control Measure 1 & 2

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
1.5	Brochures, Flyers, Fact sheets, and Handouts	1. Information and materials made available @ Township hall during Year 2: <ul style="list-style-type: none"> • Building/Zoning Permits – Water quality handouts. • <i>Mahoning Matters</i> • Mahoning SWCD- Car Washing tips. • Mahoning SWCD – Water Conservation, <i>Why should you Care?</i> • OEPA- <u>Protecting Ohio's Water</u>. • OSU Extension- Storm Water Fact Sheets. • MS4- Regulated area map 	1. Regulated MS4 area map displayed at Township Administration Building. 2. OEPA watershed map displayed at Township Administration Building.	1. BMP 1.5 address permit sections 3.2.1.2.3, 3.2.1.2.5 and 3.2.2.2.4.	1. Develop diversified handouts to meet reach target audiences. 2. Work with County Engineer to create map showing watersheds which cross Springfield Township boundaries and determine how to associate SWMP BMP's activities to watershed elements. 3. Determine how to track, evaluate, assess and report on BMP appropriateness. 4. Develop a schedule for reviewing hand out materials and identifying alternative materials. 5. Continue to hold TSWMC meetings and continue to participate in County Storm Water committee.	1. Continue to provide copies of all handouts at the township building. 2. Diversify handouts to meet and reach target audience. 3. Continue to track and assess storm water program information and update as necessary. 4. Coordinate tracking and data recording needs with other SWMP program BMPs.

SPRINGFIELD TOWNSHIP YEAR 2 ANNUAL REPORT
Table 2: Illicit Discharge Detection and Elimination Plan Minimum Control Measure 3

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(3) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
3.1	Map storm sewer system	<ol style="list-style-type: none"> 1. Severe flooding, in May and September 2004, federal disaster assistance was approved for citizens and local governments for Mahoning County. Year 2 – System Mapping was rescheduled for Year 3. Mahoning County is considering several protocols for inventory along with the attributes collected. 2. Township will initiate storm sewer mapping activities in Year 3. 3. Township to coordinate storm sewer inventory with County inventory to standardized system attribute collection. 	<ol style="list-style-type: none"> 1. Severe flooding, in May and September 2004, federal disaster assistance was approved for citizens and local governments for Mahoning County. Year 2 – System Mapping was rescheduled for Year 3. 	<ol style="list-style-type: none"> 1. BMP will address permit section 3.2.3.1.2 and 3.2.3.2.1 2. BMP Assessment here will be based on percent complete per year between Year 3 and Year 4 	<ol style="list-style-type: none"> 1. Outline System inventory approach/sequence and schedule for system outfalls and Home Sewer Treatment System (HSTS) outfalls. Coordinate HSTS inventory with District Board of Health and Mahoning County Engineers office. 2. Develop inventory protocols. 3. Determine how and where outfall inventory will be stored or filed. 4. Determine how inventory data will be linked with County- GIS mapping to create “Storm Sewer Base Map”. 5. Determine system attributes to be collected. 6. Consider including “Simple” dry weather screening activities (Color, odor, presence of flow) which can be easily performed during inventory as a method to begin identification of potential illicit discharge locations. 	<ol style="list-style-type: none"> 1. Begin inventory. 2. Complete base map for use in inventory. 3. Document process (Protocol). 4. Draft revised completion schedule. 5. Address the Dry weather screening issue.

SPRINGFIELD TOWNSHIP YEAR 2 ANNUAL REPORT
Table 2: Illicit Discharge Detection and Elimination Plan Minimum Control Measure 3

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(3) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
3.2	Develop program to detect and eliminate illicit discharges	<ol style="list-style-type: none"> Participated in County Storm Water Committee discussions regarding Dry Weather Screening protocols. Severe flooding, in May and September 2004, federal disaster assistance was approved for citizens and local governments for Mahoning County. Year 2 – System Mapping was rescheduled for Year 3. The Township will initiate storm sewer system mapping and inventory preparation activities in Year 3-scheduled completion date in permit Year 5. 	<ol style="list-style-type: none"> Severe flooding, in May and September 2004, federal disaster assistance was approved for citizens and local governments for Mahoning County. Year 2 – System Mapping was rescheduled for Year 3. The Township will initiate storm sewer system mapping and inventory preparation activities in Year 3-scheduled completion date in permit Year 5. 	<ol style="list-style-type: none"> BMP 3.2 addresses permit sections: <ul style="list-style-type: none"> ✓ 3.2.3.1.3 ✓ 3.2.3.1.4 ✓ 3.2.3.1.5 ✓ 3.2.3.2.2 ✓ 3.2.3.2.3 ✓ 3.2.3.2.4 ✓ 3.2.3.2.4.1 ✓ 3.2.3.2.4.2 ✓ 3.2.3.2.4.3 ✓ 3.2.3.2.4.4 Wastewater discharges that are identified during any inspection are required to be corrected to comply with Section 2 part C,D,E,F, & G of the Regulation of Household Sewage Disposal Systems. Off-lot discharges are permitted for wastewater when an on-lot system can not be installed and the off-lot system is installed to comply with the Regulations of Household Sewage Disposal Systems Section 2 part G. 	<ol style="list-style-type: none"> Develop preliminary Illicit Discharge Elimination Plan (IDEP). Plan should include procedures for detection and process for removal and reporting. IDEP should include schedule and implementation steps. (3.2.3.1.4, 3.2.3.2.2, 3.2.3.2.4) Develop IDEP program fact sheet for public and employee use. (3.2.3.1.5) Develop preliminary Dry Weather Screening Plan. (3.2.3.2.4.1 and 3.2.3.2.4.2). Process for prioritizing “Hot Spot” areas. Develop general procedures for removing identified illicit discharges. Develop BMP evaluation/assessment criteria or procedures. Document status for annual report in Year 3. Determine storage/file location of collected IDEP information/elimination data/follow up action-required or taken. Determine how BMP will be evaluated and assessed. Document assessment rationale for reporting. 	<ol style="list-style-type: none"> Work with County Engineer and Township Trustees to complete and obtain approval of Illicit Discharge Ordinance/regulation. Determine the following: <ul style="list-style-type: none"> ✓ Champion for IDEP program. ✓ Where IDEP will be filed and how will data be linked with County GIS. ✓ Determine whether the Dry Weather Screening will be performed during inventories. ✓ Complete schedule ✓ OEPA recommended 100 % dry weather screening be completed between Year 3 and Year 5. ✓ Draft NOV form. ✓ Evaluation process. Document location, type and action taken on Illicit detections located.

SPRINGFIELD TOWNSHIP YEAR 2 ANNUAL REPORT
Table 2: Illicit Discharge Detection and Elimination Plan Minimum Control Measure 3

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(3) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
3.3	Adopt resolutions prohibiting illicit discharges NOTE: Springfield Township has no current zoning resolution, and therefore currently has no mechanism to adopt language to prohibit illicit discharge.	1. Background research into legal authority was partially completed in Year 2. 2. Began Ohio Revised Code (ORC) and Township authority research related to County authority to implement regulations related to illicit discharge.	1. Based on research results. Regulation/ordinance should include or address the following: <ul style="list-style-type: none"> ✓ Prohibition of Illicit discharges and illegal dumping. ✓ Enforcement ✓ Private property access for investigative purposes to determine illicit source ✓ First offense warning-NOV. 	1. See BMP 3.2 for permit sections.	1. Complete review. See BMP 3.2 for sequence details. 2. Draft summary of findings document. 3. Work with Mahoning County Engineer to prepare/document draft Illicit Discharge regulation including: <ul style="list-style-type: none"> ✓ Prohibition of Illicit discharges and illegal dumping. ✓ Enforcement ✓ Private property access for investigative purposes to determine illicit source. ✓ First offense warning-NOV. 4. Determine how BMP will be evaluated and assessed. 5. Document assessment rationale for reporting.	1. Present Draft Illicit Discharge regulation to Township Storm water committee for review and comment. 2. Revised regulation based on comments. 3. Schedule meeting with Township Trustees to present draft regulation. 4. Follow through regulation adoption process to achieve passage of draft regulation(s).

SPRINGFIELD TOWNSHIP YEAR 2 ANNUAL REPORT
Table 2: Illicit Discharge Detection and Elimination Plan Minimum Control Measure 3

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(3) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
3.4	<p>Total Maximum Daily Load (TMDL) (Ohio EPA Permit Section 1.3.6) County and Township procedures should be able to demonstrate how they determined the amount of pollutant needed to be reduced within the impaired stream segment(s), and how much pollutant was reduced (i.e., water sampling to verify the amounts removed).</p>	<ol style="list-style-type: none"> 1. Table completed identifying Approved and pending TMDLs within Ohio. 2. Preliminary Mahoning County map developed showing proposed TMDL's. Map identifies regulated MS4 permit boundaries and overlays this information onto TMDL delineated watersheds. 	<ol style="list-style-type: none"> 1. County's consultant currently has a system in place to identify the TMDL watersheds located throughout the county. 2. Began development of regulated areas which overlay on top of TMDL watershed. Table includes approved and pending approval TMDLs only. 	<ol style="list-style-type: none"> 1. BMP 3.5 addresses permit section 1.3.6. 2. OEPA Construction General Permit. 	<ol style="list-style-type: none"> 1. Provide information/assistance for Mahoning County to complete TMDL layer development for the storm water Base Map. 2. Provide assistance to assist Mahoning County with completing TMDL table. Table will include the following: <ul style="list-style-type: none"> ✓ TMDL HUC code and stream name. ✓ General Description of location. ✓ Summary of causes and sources. 3. Investigate and document Township potential sources as identified in TMDL. 4. Document all assumptions made during potential source assessments. 5. Assist through Township Storm Water Management Committee with drafting outline of process to be developed in Year 5 of permit term which preliminary procedures to be implemented to address identified sources on a planning and project basis. 6. Determine how BMP will be evaluated and assessed. 7. Document assessment rationale for reporting. 	<ol style="list-style-type: none"> 1. Present map and table to Township storm water management committee and Township Trustees for review and comment. 2. Review updated Mahoning County Drainage Manual for potential edits based on completed mapping and tables.

SPRINGFIELD TOWNSHIP YEAR 2 ANNUAL REPORT

Table 3: Construction Site Storm Water Control Plan Minimum Control Measure 4

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
4.1	<p>Adopt erosion and sediment control zoning resolutions. NOTE: Springfield Township has no current zoning resolution, and therefore lacks the legal mechanism to adopt additional erosion and sedimentation controls.</p>	<p>1. Mahoning County Engineers office and Mahoning County Soil and Water Conservation District completed development of <i>Mahoning County Drainage and Sediment Control Manual- Year 2 (2004)</i>. Manual includes:</p> <ul style="list-style-type: none"> ✓ Drainage Design and Engineering ✓ Storm Drainage Systems ✓ Post-Construction Storm Water Management Requirements ✓ Storm Water Pollution Prevention plans and Erosion and sediment Control Requirements ✓ Current Flood Plain Regulations. 	<p>1. Mahoning County has developed E&SC Regulations. The E&SC Regulations are included in the revised and updated <i>Mahoning County Drainage and Sediment Control Manual</i>.</p> <p>2. Resolution from the Mahoning County Commissioners adopting the revised/updated Drainage Criteria and Erosion & Sediment Control Manual will be in place spring 2005.</p>	<p>1. BMP 4.1 Addresses permit sections:</p> <ol style="list-style-type: none"> 1. 3.2.4.1.1 2. 3.2.4.1.2 3. 3.2.4.1.3 4. 3.2.4.1.4 5. 3.2.4.1.6 6. 3.2.4.2.1 7. 3.2.4.2.2 8. 3.2.4.2.3 <p>2. OEPA Construction General Permit (CGP).</p>	<ol style="list-style-type: none"> 1. Implement the new requirements contained within the revised/updated Drainage Criteria and Erosion & Sediment Control Manual. 2. Develop necessary support forms, checklists to aid in plan review. 3. Determine how BMP will be evaluated and assessed. 4. Document assessment rationale for reporting. 	<ol style="list-style-type: none"> 1. Mahoning County will provide updates/revisions to the Manual periodically based on reviews of actual Manual concepts implemented in the field. 2. Mahoning County will consider Manual user suggestions and feedback on improving Manual content and applicability.

SPRINGFIELD TOWNSHIP YEAR 2 ANNUAL REPORT

Table 3: Construction Site Storm Water Control Plan Minimum Control Measure 4

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
4.2	Workshops on E&SC Resolutions	1. SWCD provided numerous brief, audience-specific workshops/presentations on E&SC as requested during Year 2.	1. Significant time and effort by SWCD went into the preparation of the soon to be adopted Mahoning County E&SC Regulations.	1. See BMP 4.1 for permit sections.	1. 2 – Half-day workshops will be scheduled in connection with how to use the updated manual. 2. TSWMC will develop and provide an estimated 2 workshops on erosion and sediment control BMPs in Year 3. Content includes - How to comply with the revised resolutions and how to use the updated manual? 3. Assist County SWMC with developing County and Township relevant Storm water fact sheets. 4. Develop method to track and document workshop attendance. 5. Develop a schedule for completing workshop material and also a schedule for updating workshop materials.	1. Publish workshop on web page. 2. Complete workshop material development
4.3	Enter into Memorandum of Understanding (MOU) with Mahoning SWCD	1. MOU Review and update completed in Year 2. 2. Mahoning County SWCD will continue to provide site plan review and Site erosion control inspection. 3. MOU provides guidance in delegating SWCD services in relation to Mahoning County Storm Water Plan Compliance.	1. MOU developed and signed between SWCD and the Mahoning County Engineer's Office, outlining cooperative duties/services provided by each entity.	1. BMP 4.3 addresses permit sections 3.2.4.2.2 and 3.2.4.3.4.	1. Review MOU language and update as necessary throughout Year 3.	1. Document MOU changes as necessary.

SPRINGFIELD TOWNSHIP YEAR 2 ANNUAL REPORT

Table 3: Construction Site Storm Water Control Plan Minimum Control Measure 4

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
4.4	<p>Review Erosion & Sediment Control plans/Storm Water Pollution Prevention Plans (SWPPP)</p> <p>Note: BMP name change.</p>	<ol style="list-style-type: none"> Continued current plan review process. Current plan process: <ul style="list-style-type: none"> ✓ Townships review site plans. ✓ Engineer reviews site plans (Springfield Twp.). ✓ SWCD reviews SWPPP and Erosion and Sediment Control plans. 	<ol style="list-style-type: none"> SWCD reviews residential (sub-division) and other projects requiring submission of E/S plans. The updated manual did not change the plan review process. Continue to work with County Engineer, SWCD and Building Departments to provide support for site erosion/sediment reviews. 	<ol style="list-style-type: none"> BMP 4.4 addresses permit section 3.2.4.1.4. 	<ol style="list-style-type: none"> Springfield Township will adopt the Erosion and Sediment Control regulations contained within the <i>Mahoning County Drainage and Erosion and Sediment Control Manual</i>. SWCD will work with Mahoning County Engineers office to update website with E&SC Requirements (including checklists). Develop Method to track and document number reviewed. Determine how BMP will be evaluated and assessed. Document assessment rationale for reporting. 	<ol style="list-style-type: none"> Track number of plans reviewed for E/S controls. Document date E/S checklist placed on web page. Document Township adoption of E&SC Regulations. Coordinate program elements which need tracking with County program tracking needs. Determine benefit of leveraging similar tracking requirements.
4.5	<p>Construction debris collection and disposal</p>	<ol style="list-style-type: none"> SWCD ES&C plan checklist includes Construction Debris Collection and Disposal. 	<ol style="list-style-type: none"> Erosion and Sediment Control site inspection checklist was modified in Year 2 to include Construction debris and disposal. Year 3- will focus on investigating methods to collect and document volumes of Construction debris removed and disposed of properly. 	<ol style="list-style-type: none"> BMP 4.5 addresses permit section 3.2.4.2.3. 	<ol style="list-style-type: none"> Develop standards for appropriate on-site collection systems/containers. Develop appropriate site locations for placing containers. Develop disposal procedures, frequency of pick up and potential secondary containment requirements. Draft resolutions which will allow for enforcement of non-compliance. Develop site inspection requirements and include in Zoning inspectors cross-raining (See BMP 4.4). Determine how BMP will be evaluated and assessed. Document assessment rationale for reporting. 	<ol style="list-style-type: none"> SWCD to continue to inspect/evaluate active construction sites, using county enforcement abilities as they are developed. SWCD will track inspections with Urban Site Program (ACCESS database). Using Urban Site Program method to track sites and document violations. Collect quantitative information on volumes and number of violations and corrections for reporting.

SPRINGFIELD TOWNSHIP YEAR 2 ANNUAL REPORT

Table 3: Construction Site Storm Water Control Plan Minimum Control Measure 4

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
4.6	<p>Inspect active sites SWCD will continue inspect active construction sites.</p>	<ol style="list-style-type: none"> SWCD – continued with current construction site inspection program. Began implementation Urban Site Program Database tracking system. 	<ol style="list-style-type: none"> Active construction sites are inspected/evaluated against compliance conditions set forth in OEPA's Construction General Permit. Inspections are tracked with Urban Site Program (ACCESS database). 	<ol style="list-style-type: none"> BMP 4.5 addresses permit section 3.2.4.1.6 Inspections provided local impetus for compliance with terms of NPDES/Construction storm water permit. 	<ol style="list-style-type: none"> SWCD – continue with current construction site inspection program. Develop method to collect and present data from Urban site Program for reporting purposes. Determine data presentation format. Determine Inspection frequency/schedule. OEPA SWMP comment indicated minimum of once per month. Determine how BMP will be evaluated and assessed. Document assessment rationale for reporting 	<ol style="list-style-type: none"> Report out data from Urban Site Program. Number of sites. Summary of recurring violations. Modify E/S controls if necessary to reduce recurring inspection noted deficiencies.
4.7	<p>Enforcement actions</p>	<p>Springfield Township will adopt <i>Mahoning County Drainage and Erosion and Sediment Control Manual</i>, by adopting the manual the following applies:</p> <ol style="list-style-type: none"> Mahoning County Engineers office and Mahoning County Soil and Water Conservation District completed development of <i>Mahoning County Drainage Erosion and Sediment Control Manual- Year 2 (2004)</i>. Review other County-E/S enforcement requirements/regulations during development of the updated manual. Notice of Violation form implemented to notify developers/contractors of major non-compliances. 	<ol style="list-style-type: none"> Resolution from Mahoning County Commissioners adopting the updated Drainage and Erosion and Sedimentation Control Manual will be in place Spring 2005. 	<ol style="list-style-type: none"> BMP addresses permit section 3.2.4.2.6 Commissioners will be urged to adopt a resolution allowing the use HB 411 to enable County to enforce regulations. 	<ol style="list-style-type: none"> Implement new requirements contained in the updated Drainage and Sediment and Erosion Control Manual. Determine fee structure for NOV and re-inspection fee. Re-inspection fees after 3 consecutive NOVs will be implemented. Determine method to track, record and document Inspections and enforcement actions taken. Determine how BMP will be evaluated and assessed. Document assessment rationale for reporting. Develop method/enforcement mechanism that zoning inspector can issue stop work order. Coordinate with County prosecutor as necessary. 	<ol style="list-style-type: none"> Mahoning County will provide updates/revisions to the Manual periodically based on reviews of actual Manual concepts implemented in the field. Mahoning County will consider Manual user suggestions and feedback on improving Manual content and applicability.

SPRINGFIELD TOWNSHIP YEAR 2 ANNUAL REPORT

Table 3: Construction Site Storm Water Control Plan Minimum Control Measure 4

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
4.8	Respond to public complaints regarding construction activities	<ol style="list-style-type: none"> 1. Began process of establishing a contact number for public feedback/complaints. 2. Current system in place under Year 2 – Direct complaints to SWCD. 	<ol style="list-style-type: none"> 1. Current mechanism in place is to direct complaints through SWCD. 	<ol style="list-style-type: none"> 1. BMP 4.7 addresses permit section 3.2.4.2.5. 	<ol style="list-style-type: none"> 1. Develop and publish call in number for water quality, construction site pollution complaints. 2. Develop method to track and document complaints. 3. Tracking will allow for follow up and documentation of complaint resolution. 4. Determine how BMP will be evaluated and assessed. 5. Document assessment rationale for reporting. 6. Springfield Township will advertise through newsletter and web site, a phone number for residents concerned about specific construction activities. 	<ol style="list-style-type: none"> 1. Establish call in number. 2. Determine tracking and documenting procedures.
4.9	Concrete Truck Wash Out	<ol style="list-style-type: none"> 1. Concrete Truck Wash Out procedures and locations were identified in the updated drainage and erosion and sediment control manual. 	<ol style="list-style-type: none"> 1. Checklist developed includes requirements for concrete truck wash-out. 2. CGP was used to develop procedures and text for this BMP. 3. Regulations have been adopted and will be included as addendums to the updated drainage regulations. 	<ol style="list-style-type: none"> 1. BMP 4.9 addressed permit section 3.2.4.1.3. 2. E&SC plans are required to designate procedures for concrete truck wash-out. 	<ol style="list-style-type: none"> 1. Develop standard drawing for BMP. 2. Document violations and corrections at sites. 3. Determine method to track and document violations and corrective action. 4. Determine how BMP will be evaluated and assessed. 5. Document assessment rationale for reporting. 	<ol style="list-style-type: none"> 1. Continue to apply checklist to review SWPPP and E/S plans. 2. Coordinate tracking and data recording needs with other SWMP BMPs.
4.10	Construction Site Ingress/Egress	<ol style="list-style-type: none"> 1. Ingress/Egress BMP procedures were addressed in the updated drainage and erosion and sedimentation control manual. 	<ol style="list-style-type: none"> 1. Checklist developed includes requirements for site ingress/egress protection. 2. CGP was used to develop procedures and text for this BMP. 3. Regulations have been adopted and will be included as addendums to the updated drainage regulations. 	<ol style="list-style-type: none"> 1. BMP 4.10 addressed permit section 3.2.4.1.3. 2. E&SC plans are required to designate procedures for Construction Site ingress/egress. 	<ol style="list-style-type: none"> 1. Develop standard drawing for BMP. 2. Document violations and corrections at sites. 3. Determine method to track and document violations and corrective action. 4. Determine how BMP will be evaluated and assessed. 5. Document assessment rationale for reporting. 	<ol style="list-style-type: none"> 1. Continue to use the existing checklist, allowing for revisions as deemed necessary. 2. Develop means to track number of corrections based on inspections.

SPRINGFIELD TOWNSHIP YEAR 2 ANNUAL REPORT
Table 4: Post-Construction Storm Water Minimum Control Measure 5

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
5.1	Workshops for Post-Construction Regulations Note: BMP name change	1. SWCD held multiple site specific workshops and presentations related to Erosion and Sediment Control. 2. 2 – Half-day workshops will be scheduled in connection with how to use the updated manual. 3. Complete updates to Drainage and Sediment and Erosion Control Manual, which included Post-Construction BMP's. Note: Workshops for Year 2 were sediment/Erosion control focused.	1. Significant time and effort by SWCD went into the preparation of the soon to be adopted Mahoning County E&SC Regulations. Note: Year 3- workshops will be modified to accommodate Post-Construction Controls.	1. BMP 5.2 addresses permit section 3.2.5.2.3.3. 2. Construction General Permit.	1. Develop materials and schedule a minimum of 2 workshops focused on Mahoning County's Post-Construction BMP's. 2. Develop schedule to perform reviews and updates of workshop materials. 3. Determine how BMP will be evaluated and assessed. 4. Document assessment rationale for reporting. 5. Determine how to track workshop attendance and update workshop materials as necessary.	1. Investigate and identify location or sources that developers, contractors, engineers, builders and public can go to access information on Post-Construction storm water management BMP's.
5.2	Post-Construction Storm Water Management Resolutions- See County table BMP 5.1. Note: By reference this BMP covers BMP's 5.1.1 through 5.1.6 addressed in detail in the county Post-Construction MCM table. (Structural and Non-Structural).	1. Mahoning County Engineers office and Mahoning County Soil and Water Conservation District completed development of <i>Mahoning County Drainage and Sediment Control Manual- Year 2 (2004)</i> . 2. Section 4.4 in the updated Drainage manual addresses this BMP with supporting schematic drawings. 3. County Engineer held a public comment period for the Manual as required by ORC. Comments were incorporated into the manual prior to final edits and presentation to County commissioners.	1. Mahoning County has developed E&SC Regulations. The E&SC Regulations are included in the revised and updated Mahoning County Drainage Criteria Manual.	1. BMP 5.1.1 addresses permit sections: ✓ 3.2.5.2.4 ✓ 3.2.5.2.4.2 ✓ 3.2.5.2.4.3 2. OEPA Construction General Permit (CGP): ✓ Post-Construction Section – Part III.G.2.e	1. Determine method to track BMPs installed for maintenance purposes. 2. Develop BMP maintenance document. 3. Investigate value in developing a GIS layer to locate these on storm water base map. 4. Investigate and establish BMP measurable goals for reporting and evaluation. 5. Determine evaluation or assessment methods to determine appropriateness. 6. Document evaluation rationale for reporting.	1. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking . 2. Develop and identify BMP maintenance needs and responsible personnel. 3. Consider developing BMP maintenance manual. OEPA SWMP comment recommends minimum inspection frequency of 1x annually. (See BMP 5.3)

SPRINGFIELD TOWNSHIP YEAR 2 ANNUAL REPORT
Table 4: Post-Construction Storm Water Minimum Control Measure 5

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
5.3	Develop Strategies and Policies to address maintenance of privately owned storm water facilities	1. Determine what is appropriate without zoning.	1. Complete legal research related to ORC regarding township and private property issues.	1. BMP 5.3 addresses permit section 3.2.3.2.2, 3.2.3.2.3 and 3.2.6.1.4. 2. Continuing legal research concerning township's authority to regulate private storm water facilities.	1. Continue researching and documenting legal authority associated with Townships ability to require maintenance be preformed on private Storm Water Management facilities. 2. Investigate Adopting maintenance standards that would be consistent with the Ohio Revised Code. 3. Investigate level of effort associated with mapping privately owned storm water management facilities for both water quality purposes and more importantly as a tool to assist with water quantity/flood control management. 4. Develop BMP maintenance form. 5. Outline short and long term strategies for BMP maintenance requirements. 6. Determine facility attributes to obtain during mapping of facilities. 7. Determine how BMP maintenance will be evaluated and assessed. 8. Document assessment rationale for reporting.	1. Implementation is dependent of resolution of legal authority issue. 2. Township will identify (map) all privately (residential/commercial/industrial) owned storm water facilities and develop and implement standards for frequency and required maintenance, along with proper documentation of maintenance. Coordinate tracking and data recording needs with other SWMP BMPs, both at the county and Township levels. 3. Consider developing BMP maintenance manual. OEPA SWMP comment recommends minimum inspection frequency of 1x annually. (See BMP 5.3)

SPRINGFIELD TOWNSHIP YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 6

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	BMP Appropriateness Assessment	Permit Year 2005 Year 3 Objective	Year 32 BMP Implementation Activity
6.1	<p align="center">Operation and maintenance program to prevent or reduce storm water pollution from community operations.</p>	<p>1. Road Superintendent to continue conducting quarterly training on O&M procedures and reporting.</p>	<p>1. Township Storm Water Management Committee working with maintenance/Road Superintendents to develop an O&M program.</p>	<p>1. BMP 6.1 addresses permit section 3.2.6 through 3.2.6.2.5</p>	<p>1. Complete development of operations and maintenance procedures for manual. 2. Road Superintendent to continue conducting quarterly training on storm water O&M procedures and reporting. 3. Develop O/M training materials. 4. Document number attended, date, topics. 5. Determine how O/M procedures will be evaluated and assessed. 6. Document assessment rationale for reporting.</p>	<p>1. Begin to implement completed Operation and Maintenance procedures related to storm water pollution reduction. 2. Determine how to collect and record information for reporting purposes. 3. Coordinate program elements which need tracking with County program tracking needs. Determine benefit of leveraging similar tracking requirements. 4. Consider developing BMP maintenance manual. OEPA SWMP comment recommends minimum inspection frequency of 1x annually. (See BMP 5.3)</p>

SPRINGFIELD TOWNSHIP YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 6

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	BMP Appropriateness Assessment	Permit Year 2005 Year 3 Objective	Year 32 BMP Implementation Activity
6.2	Staff education program on pollution prevention	1. Review training programs and update or modify as necessary.	1. Continue staff education program throughout 2005	1. BMP 6.2 addresses permit section 3.2.6.1.1 and 3.2.6.1.2.	1. Identify potential pollution sources/pollution types per maintenance activity to better focus training and O/M practices on. 2. Identify areas/practices/procedures that could be updated and incorporate water quality elements. 3. Develop training schedule and materials based on review of O/M review and focus training on target audience. 4. Determine evaluation or assessment methods to determine BMP appropriateness or effectiveness. 5. Determine methods to track and organize training attendees, when training materials need to be updated and reporting needs.	1. Present training needs to storm water committee. 2. Outline training materials need and develop schedule to develop, secure and build training program. OEAP SWMP comment- Recommends 1x year to hold training. 3. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking .
6.3	Street Sweeping	1. Done on a Contract basis. Township begins sweeping in April.	1. Road Superintendent: Insure compliance.	1. BMP 6.3 addresses permit sections: ✓ 3.2.6.2.1 ✓ 3.2.6.2.3.1 ✓ 3.2.6.2.3.2 ✓ 3.2.6.2.3.3 ✓ 3.2.6.2.3.4 ✓ 3.2.6.2.4 ✓ 3.2.6.2.5	1. Draft sweeping schedule and procedures. Tie protocols/procedures to training being developed in 6.2. Post on county web page schedule. 2. Develop forms to record quantity of street sweepings collected. 3. Determine evaluation or assessment methods to determine BMP appropriateness or effectiveness. 4. Develop system to track and store collected information for reporting purposes.	1. Perform and record street sweeping activities- number of miles, amount collected. 2. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking .

SPRINGFIELD TOWNSHIP YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 6

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	BMP Appropriateness Assessment	Permit Year 2005 Year 3 Objective	Year 32 BMP Implementation Activity
6.4	Litter Pickup	1. Plastic garbage bags are counted at pickup up. Average weight of the bags is then used to determine tonnage collected.	1. Promoting Litter pickup and citizen cooperation in the program.	BMP 6.4 addresses permit section 3.2.6.2.3.2	1. Draft procedures to collect and report quantities of trash collected. Develop forms as necessary to track collections. 2. Draft method to track and report. 3. Determine evaluation or assessment methods to determine BMP appropriateness or effectiveness.	1. The township participates in the Mahoning County Green team litter pickup program. 2. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking .
6.5	Salt Storage and Applications	1. Salt drainage, salt storage, and spillage were Monitored.	1. Salt storage facility is covered. 2. Storage facility drainage was deemed to not be a problem.	1. BMP 6.5 addresses permit sections: ✓ 3.2.6.2.1 ✓ 3.2.6.2.3.1 ✓ 3.2.6.2.3.2 ✓ 3.2.6.2.3.3 ✓ 3.2.6.2.3.4 ✓ 3.2.6.2.4 ✓ 3.2.6.2.5	1. Develop written clean up procedures. 2. Draft salt storage procedures. 3. Document application procedures and procedures for clean up if excess salt is applied or a salt spill occurs. 4. Track and evaluate the BMP and document effectiveness. 5. Determine how to evaluate/assess modifications and post event clean up activities or procedures.	1. Modify drainage system if necessary. 2. Implement developed and documented clean up procedures, salt storage procedures and application procedures. 3. Record total de-icing material used annually. 4. Complete storage facility drainage/outfall inventory. 5. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking .
6.6	Mowing Practices	1. Review in field fueling practices. 2. Began documentation of staff practices related to clean fueling and mowing practices.	1. Township mowing of right of ways is done twice a year. Once in June and again in August.	BMP 6.6 addresses permit section 3.2.6.2.3.1	1. Document in field fueling practices and other mowing operations practices with staff before cutting season. 2. Develop method to track personnel provided training. 3. Develop method to evaluate BMP effectiveness for report.	1. Continue to practice clean in field fueling practices and other mowing practices. 2. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking .

SPRINGFIELD TOWNSHIP YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 6

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	BMP Appropriateness Assessment	Permit Year 2005 Year 3 Objective	Year 32 BMP Implementation Activity
6.7	Storm Water System Maintenance	1. Written procedures and standards to be written by the Road Superintendent.	1. Road Superintendent to insure compliance.	1. BMP 6.7 addresses permit sections: ✓ 3.2.6.2.1 ✓ 3.2.6.2.3.1 ✓ 3.2.6.2.3.2 ✓ 3.2.6.2.3.3 ✓ 3.2.6.2.3.4 ✓ 3.2.6.2.4 ✓ 3.2.6.2.5	1. Develop documented procedures and standards for cleaning and disposing of spoil materials. 2. Document current catch basin and ditch maintenance and inspection program and schedule. 3. Develop Checklist to assist with documentation of catch basins cleaned and linear footage of ditches cleaned/maintained. 4. Develop method to evaluate BMP effectiveness for reporting.	1. Continue the current catch basin and ditch maintenance and inspection program. 2. Present draft procedures to TSWMC for comment. 3. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking .
6.8	Storage of construction materials and disposal of spoil	1. Continue current practice of storing bulk materials inside or under cover. 2. Township construction debris was properly disposed of in a certified landfill per waste type.	1. Document debris disposal (if any) practice. 2. Determine value of picking up aggregate at the mine versus on site storage.	BMP 6.8 addresses permit section 3.2.6.2.3.3	1. Review current storage practices. 2. Draft storage and disposal procedures or modifications. 3. Develop method to record amount and type of debris disposed of as follows: • Lbs. of soil. • Lbs. of stone. • Lbs. of other. 4. Develop method to track personnel provided training. 5. Develop method to evaluate BMP effectiveness for report.	1. Modify current storage practice of bulk materials based on review. 2. Begin to record amount and type of debris disposed of. 3. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking .

SPRINGFIELD TOWNSHIP YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 6

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	BMP Appropriateness Assessment	Permit Year 2005 Year 3 Objective	Year 32 BMP Implementation Activity
6.9	Fleet Maintenance	1. Begin program to document amount of vehicle fluids recycled and disposed of. Track and evaluate BMP and document effectiveness. 2. Draft sediment basin maintenance and spoil disposal plan.	1. Police car maintenance done at local Ford Garage. 2. Road Superintendent to collect oils waste for recycling.	1. BMP 6.9 addresses permit sections: ✓ 3.2.6.2.1 ✓ 3.2.6.2.3.1 ✓ 3.2.6.2.3.2 ✓ 3.2.6.2.3.3 ✓ 3.2.6.2.3.4 ✓ 3.2.6.2.4 ✓ 3.2.6.2.5	1. Develop vehicle fluid recycling form to begin documentation of amounts of vehicle fluids recycled and disposed of. 2. Draft Inside Trap cleaning frequency and procedures. 3. Track and evaluate BMP and document effectiveness. 4. Draft Fleet vehicle washing procedures and location requirements for performing vehicle washing.	1. Document amount of vehicle fluids recycled and disposed of. 2. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking . 3. Begin documentation of any facility drainage modifications related vehicle washing or floor drain reconnection or relocation.
6.10	Recycling/Separation/Disposal	1. Encourage drop off sites and curb side recycling are handled by the Mahoning County Division of Recycling	1. Modify as necessary and report on any modifications	1. BMP 6.10 addresses permit sections: ✓ 3.2.6.2.1 ✓ 3.2.6.2.3.1 ✓ 3.2.6.2.3.2 ✓ 3.2.6.2.3.3 ✓ 3.2.6.2.3.4 ✓ 3.2.6.2.4 ✓ 3.2.6.2.5	1. Develop procedures to document collected amounts of: ✓ Oil + additional vehicle fluids ✓ Tires 2. Develop form to assist with tracking and evaluation of BMP effectiveness. 3. Develop method to track and report quantities.	1. Report on the quantities of materials. Collected for disposal and those for recycling. 2. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking

SPRINGFIELD TOWNSHIP YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 6

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	BMP Appropriateness Assessment	Permit Year 2005 Year 3 Objective	Year 32 BMP Implementation Activity
6.11	Oil / Water Separators	1.Track and evaluate and report amounts cleaned and assess the effectiveness of the BMP.	1. Current maintenance program is documented as effective.	1. BMP 6.11 addresses permit sections: ✓ 3.2.6.2.1 ✓ 3.2.6.2.3.1 ✓ 3.2.6.2.3.2 ✓ 3.2.6.2.3.3 ✓ 3.2.6.2.3.4 ✓ 3.2.6.2.4 ✓ 3.2.6.2.5	1. Develop method and form to track and record frequency of maintenance and amount of spoil removed. 2. Document maintenance procedures for Township Oil. Water separators. 3. Track, evaluate and report number cleaned, lbs. of spoil collected and determine how to assess effectiveness of BMP.	1. Begin to develop maintenance and documentation procedures. 2. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking .
6.12	Spill Management Procedures	1. Review spill management procedures and update as needed.	1. Program is effective.	1. Procedures are through the Mahoning County Hazmat Department and the Springfield Fire Department.	1. Continue to review spill management procedures and update as needed. 2. Determine with assistance from Township Fire Department how to document number of Spill responses during permit year? 3. Investigate benefit developing Spill incident storm water system base map? 4. Determine how to evaluate and assess BMP?	1. Continue to use the spill management procedures presently approved by Haz-Mat and Fire and update as needed. 2. Coordinate tracking methods with other SWMP tracking needs. Evaluate overall program tracking needs and assess tools to assist with tracking .

MILL CREEK METROPARKS YEAR 2 ANNUAL REPORT
Table 1: Public Involvement/Participation Minimum Control Measure 1 & 2

ID	Best Management Practice	Permit Year 2004 Year 2 Objectives and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
1.1	Township Storm Water Management Committee	1. Continue active participation in county storm water committee. 2. Present significant storm water developments to Park board.	1. MetroParks is represented on Storm Water Management Committee. Park Board informed of significant storm water issues. 2. MetroParks is participating in Mahoning County's Storm Water Management Committee	1. BMP 1.1 addresses permit sections 3.2.1.2.3 and 3.2.2.2.3.	1. Metroparks will perform the following activities in Year 3: ✓ Develop township BMP implementation schedule. ✓ Develop BMP table and determine responsible personnel for implementation, documentation and maintenance activities associated with BMP's 2. Determine how Metroparks storm water BMP implementation, maintenance and support activities will tracked, collected and reported. 3. Determine how BMP will be evaluated and assessed.	1. Continue with storm water management program, as stated.
1.2	Newsletters	Execute an updated 2004 Memorandum of Understanding (MOU) with the Mahoning County Board of Commissioners. Public Involvement: The County announced availability of draft SWMP for review and comments by public. Copies of draft SWMP were placed throughout the county, including the Mill Creek MetroParks Administration Office, for review and comment. Meeting was held with "external" stakeholders to present the plan and to solicit comments on the plan. Two public meetings were held where the public could come to learn about the plan, ask questions, and submit comments. All comments	The Board of Park Commissioners signed a Memorandum of Understanding (MOU) with the Mahoning County Board of Commissioners on March 30, 2004, agreeing to the Minimum Control Measures set forth therein. Continue by agreement under the MOU to be an active participant in Mahoning County's Storm Water Management program.	1. BMP 1.3 addresses permit section 3.2.1.2.5. Due to budget constraints within the county, the SWCD staff hours were reduced. The Education Specialist resigned; consequently, educational programs have been cut dramatically.	Execute an updated 2005 Memorandum of Understanding (MOU) with the Mahoning County Board of Commissioners.	Track and respond to any MOU revisions or updates.

MILL CREEK METROPARKS YEAR 2 ANNUAL REPORT
Table 1: Public Involvement/Participation Minimum Control Measure 1 & 2

ID	Best Management Practice	Permit Year 2004 Year 2 Objectives and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
		were considered in developing the final plan.				
1.3	Public Meetings	<p>Continue to provide storm water, natural resource information to SWCD in support of this BMP. Document material supplied.</p> <p>Newsletters: Several newsletters are provided to residents in Mahoning County. 1. Mahoning County SWCD Education Newsletter – 3 times a year during school year. <i>Mahoning Matters, a quarterly publication of Mahoning SWCD – distributed to 104,686 county residents.</i></p>	<p>MetroParks partnered with SWCD to write and deliver an educational newsletter three times throughout the school year. This newsletter reaches high numbers of the student population which is necessary for successful education.</p>	1. BMP 1.3 addresses permit section 3.2.1.2.4, 3.2.1.2.6 and 3.2.2.2.2.	Continue to provide storm water, natural resource information to SWCD in support of this BMP. Document material supplied.	Continue to partner with SWCD for newsletter.

MILL CREEK METROPARKS YEAR 2 ANNUAL REPORT
Table 1: Public Involvement/Participation Minimum Control Measure 1 & 2

ID	Best Management Practice	Permit Year 2004 Year 2 Objectives and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
1.4	Community Activities	Continue providing brochures at MetroParks facilities. Make additional storm water/water quality printed materials available to the public at MetroParks facilities. Monitor and report quantities taken by the public.	Brochures were made available to the public at several MetroParks facilities. Brochures, Flyers, Fact sheets, and Handouts: 1. Mill Creek MetroParks will make available the following information available from County and other agencies and organizations: a. Mahoning SWCD – Conservation Car Wash Tips. b. Mahoning SWCD- Water Conservation Why should you care? c. OEPA – Protecting Ohio's water. d. OSU Extension Fact Sheets related to SW. e. Map of County watersheds and regulated areas. AWARE Brochure.	1. <u>Green Team</u> BMP 1.4 address permit sections 3.2.1.2.3, 3.2.1.2.5 and 3.2.2.2.4.	Continue to make storm water and water quality printed materials/brochures available to public at MetroParks facilities. Monitor and report quantities taken by the public.	Continue to make storm water and water quality printed materials/brochures available to public at MetroParks facilities. Monitor and report quantities taken by the public.
1.5	Brochures, Flyers, Fact sheets, and Handouts	Track the number of annual website visits. Retain copies of any developed material for use and distribution for reporting purposes. Web Site: SWMP will be added to County web site and links provided where additional storm water information can be found. Links include: 1. County web site 2. SWCD web site 3. Green Team web site 4. AWARE web site 5. County Health Depart. web site 6. Sanitary Engineers web site 7. Other agency web sites (OEPA, ODNR, etc.)	Several website links for storm water information were added to the MetroParks website in 2004. General watershed information was also added. Visits to website through 2004 totaled 174,642. No baseline data was available to determine visits occurring exclusively in 2004. Annual number of visits to website will now be accurately tracked.	1. BMP 1.5 address permit sections 3.2.1.2.3, 3.2.1.2.5 and 3.2.2.2.4.	Track the number of annual website visits.	Track the number of annual website visits

MILL CREEK METROPARKS YEAR 2 ANNUAL REPORT
Table 1: Public Involvement/Participation Minimum Control Measure 1 & 2

ID	Best Management Practice	Permit Year 2004 Year 2 Objectives and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
1.6	Community Events	<p>Determine value of making this an annual event or semi-annual.</p> <p>Track events, attendance and trash totals; report totals and assess and modify the selected BMP's as necessary.</p> <p>Community activities: Community events will be used to educate public about SWMP.</p> <ol style="list-style-type: none"> 1. Annual community clean-up on Earth Day. 2. AWARE annual watershed festival. 3. MetroParks annual litter/trash clean-up for stream corridors and properties. 	<p>A clean-up day was conducted with the Boy Scouts in May 2004 and included several MetroParks properties, with over 500 participants. Each Scout was given a 'take home' package of information concerning the natural environment.</p> <p>Very successful clean-up effort. This will continue as an annual event.</p>		Track events, attendance and trash totals; report totals and assess and modify the selected BMP's as necessary.	Track events, attendance and trash totals.
1.7	Storm Water Education Campaign Grade School educational programs	Implement updates. Track number of students at programs and report to SWMC. Continue program.	Storm water management issues were incorporated into all facility tours at the MetroParks Farm. 10,088 total individuals were informed. Storm water issues were also included in various public programs with a total of 590 participants. MetroParks partnered with SWCD to write and deliver an educational newsletter three times throughout the school year.		Track number of students at programs. Continue program. No specific program on storm water management is planned, but rather integration of such issues into many education programs.	Track number of students at programs. Continue program.

MILL CREEK METROPARKS YEAR 2 ANNUAL REPORT
Table 2: Illicit Discharge Detection and Elimination Plan Minimum Control Measure 3

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
3.1	Map storm sewer system	<ol style="list-style-type: none"> 1. Initiate storm sewer system mapping and inventory preparation in Year 1 with completion by Year 5. 2. Develop survey protocol. Location of outfalls. <ul style="list-style-type: none"> • Names and location of surface waters to which outfalls discharge. • Location of HSTS. • Type and size of conduits/ditches through which HSTS discharge. 3. Determine inventory survey sequencing. 4. Develop schedule. 	<ol style="list-style-type: none"> 1. Due to severe weather events occurring in Year 2, the program development was delayed until Year 3. The County will initiate storm sewer system mapping and inventory preparation in Year 3 with completion by Year 5. 2. Severe flooding, in May and September 2004, federal disaster assistance was approved for citizens and local governments for Mahoning County. Year 2 – System Mapping was rescheduled for Year 3. 	<ol style="list-style-type: none"> 1. BMP will address permit section 3.2.3.1.2 and 3.2.3.2.1 2. BMP Assessment here will be based on percent complete per year between Year 3 and Year 4 	<ol style="list-style-type: none"> 1. Outline System inventory approach/sequence and schedule for system outfalls and Home Sewer Treatment System (HSTS) outfalls. Coordinate HSTS inventory with District Board of Health and Mahoning County Engineers office. 2. Develop inventory protocols. 3. Determine how and where outfall inventory will be stored or filed. 4. Determine how inventory data will be linked with County- GIS mapping to create "Storm Sewer Base Map". 5. Determine system attributes to be collected. 6. Consider including "Simple" dry weather screening activities (Color, odor, presence of flow) which can be easily performed during inventory as a method to begin identification of potential illicit discharge locations. 	<ol style="list-style-type: none"> 1. Begin inventory. 2. Complete base map for use in inventory. 3. Document process (Protocol). 4. Draft revised completion schedule. 5. Address the Dry weather screening issue.

MILL CREEK METROPARKS YEAR 2 ANNUAL REPORT
Table 2: Illicit Discharge Detection and Elimination Plan Minimum Control Measure 3

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
3.2	Develop program to detect and eliminate illicit discharges	<p>1. Severe flooding, in May and September 2004, federal disaster assistance was approved for citizens and local governments for Mahoning County. Year 2 – System Mapping was rescheduled for Year 3. The Township will initiate storm sewer system mapping and inventory preparation activities in Year 3-scheduled completion date in permit Year 5.</p> <p>2. Develop dry weather screening protocols and detection program procedures in Year 2.</p> <p>3. Begin illicit discharge detection program in Year 2, document any located and report action taken for removal.</p> <p>4. Develop program to detect and eliminate illicit discharges:</p> <p>a. Inspect outfalls for dry weather flows in the storm sewer systems within the MetroParks.</p> <p>b. Determine source of illicit discharge and possible methods to eliminate the source.</p> <p>c. Establish reporting and notification procedures if origin of illicit discharge is traced to properties outside of MetroParks.</p>	<p>1. Severe flooding, in May and September 2004, federal disaster assistance was approved for citizens and local governments for Mahoning County. Year 2 – System Mapping was rescheduled for Year 3. The Township will initiate storm sewer system mapping and inventory preparation activities in Year 3-scheduled completion date in permit Year 5.</p> <p>2. Wastewater discharges that are identified during any inspection are required to be corrected to comply with Section 2 part C,D,E,F, & G of the Regulation of Household Sewage Disposal Systems.</p> <p>3. Off-lot discharges are permitted for wastewater when an on-lot system can not be installed and the off-lot system is installed to comply with the Regulations of Household Sewage Disposal Systems Section 2 part G.</p>	<p>1. BMP 3.2 addresses permit sections:</p> <ul style="list-style-type: none"> ✓ 3.2.3.1.3 ✓ 3.2.3.1.4 ✓ 3.2.3.1.5 ✓ 3.2.3.2.2 ✓ 3.2.3.2.3 ✓ 3.2.3.2.4 ✓ 3.2.3.2.4.1 ✓ 3.2.3.2.4.2 ✓ 3.2.3.2.4.3 ✓ 3.2.3.2.4.4 <p>2. Wastewater discharges that are identified during any inspection are required to be corrected to comply with Section 2 part C,D,E,F, & G of the Regulation of Household Sewage Disposal Systems.</p> <p>3. Off-lot discharges are permitted for wastewater when an on-lot system can not be installed and the off-lot system is installed to comply with the Regulations of Household Sewage Disposal Systems Section 2 part G.</p>	<p>1. Begin development of Illicit Discharge Ordinance. Outline suggested enforcement procedures. (3.2.3.1.3 and 3.2.3.2.3). Develop draft schedule for implementation.</p> <p>2. Develop preliminary Illicit Discharge Elimination Plan (IDEP). Plan should include procedures for detection and process for removal and reporting. IDEP should include schedule and implementation steps. (3.2.3.1.4, 3.2.3.2.2, 3.2.3.2.4)</p> <p>3. Develop IDEP program fact sheet for public and employee use. (3.2.3.1.5)</p> <p>4. Develop preliminary Dry Weather Screening plan. Plan. (3.2.3.2.4.1 and 3.2.3.2.4.2).</p> <p>5. Process for prioritizing “Hot Spot” areas.</p> <p>6. Develop general procedures for removing identified illicit discharges.</p> <p>7. Develop BMP evaluation/assessment criteria or procedures. Document status for annual report in Year 3.</p> <p>7. Determine storage/file location of collected IDEP information/elimination data/follow up action- required or taken.</p> <p>8. Determine how BMP will be evaluated and assessed.</p> <p>9. Document assessment rationale for reporting.</p> <p>10. Develop dry weather screening protocols and detection program procedures in Year 2.</p> <p>11. Mahoning County is considering several protocols for inventory along with the attributes collected.</p>	<p>1. Obtain County Commissioner approval for Dry Weather Screening protocols if necessary.</p> <p>2. Implement protocols.</p> <p>3. Document location, type and action taken on Illicit detections located.</p> <p>4. Work with County engineer and Township Trustees to complete and obtain approval of Illicit Discharge Ordinance/regulation.</p> <p>5. Work with County Sanitary Engineer, District Board of Health, Townships and Mill Creek Metroparks to draft both Illicit Discharge Ordinance language and to outline the IDEP program for the County.</p> <p>6. Determine the following:</p> <ul style="list-style-type: none"> ✓ Champion for IDEP program. ✓ Where IDEP will be filed and how will data be linked with County GIS. ✓ Determine whether the Dry Weather Screening will be performed during inventories. ✓ Complete schedule ✓ OEPA recommended 100 % dry weather screening be completed between Year 3 and Year 5. ✓ Draft NOV form. <p>Evaluation process.</p>

MILL CREEK METROPARKS YEAR 2 ANNUAL REPORT
Table 2: Illicit Discharge Detection and Elimination Plan Minimum Control Measure 3

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
3.3	Adopt resolutions prohibiting illicit discharges	<ol style="list-style-type: none"> 1. Began Ohio Revised Code (ORC) and Township authority research related to County authority to implement regulations related to illicit discharge. 2. Complete review. 3. Draft summary of findings document. 4. Prepare draft enforcement language. 	<ol style="list-style-type: none"> 1. Based on research results. Regulation/ordinance should include or address the following: <ul style="list-style-type: none"> ✓ Prohibition of Illicit discharges and illegal dumping. ✓ Enforcement ✓ Private property access for investigative purposes to determine illicit source. First offense warning- NOV. 2. Background research into legal authority was partially completed in Year 2. 3. Wastewater discharges that are identified during any inspection are required to be corrected to comply with Section 2 part C,D,E,F, & G of the Regulation of Household Sewage Disposal Systems. 4. Off-lot discharges are permitted for wastewater when an on-lot system can not be installed and the off-lot system is installed to comply with the Regulations of Household Sewage Disposal Systems Section 2 part G. 	<ol style="list-style-type: none"> 1. See BMP 3.2 for permit sections. 	<ol style="list-style-type: none"> 1. Complete review. See BMP 3.2 for sequence details. 2. Draft summary of findings document. 3. Prepare draft Illicit Discharge regulation including: <ul style="list-style-type: none"> ✓ Prohibition of Illicit discharges and illegal dumping. ✓ Enforcement ✓ Private property access for investigative purposes to determine illicit source. ✓ First offense warning- NOV. 4. Determine how BMP will be evaluated and assessed. 5. Document assessment rational for reporting. 6. Complete research/review to begin drafting enforcement language. 	<ol style="list-style-type: none"> 1. Present Draft Illicit Discharge regulation to Township Storm water committee for review and comment. 2. Revised regulation based on comments. 3. Schedule meeting with Township Trustees to present draft regulation. 4. Follow through regulation adoption process to achieve passage of draft regulation(s).

MILL CREEK METROPARKS YEAR 2 ANNUAL REPORT
Table 2: Illicit Discharge Detection and Elimination Plan Minimum Control Measure 3

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
3.4	<p>Total Maximum Daily Load (TMDL) (Ohio EPA Permit Section 1.3.6) County and Township procedures should be able to demonstrate how they determined the amount of pollutant needed to be reduced within the impaired stream segment(s), and how much pollutant was reduced (i.e., water sampling to verify the amounts removed).</p>	<p>Complete TMDL map correlating OEPA approved TMDL watersheds in relationship to County and townships regulated areas.</p> <p>Total Maximum Daily Load (TMDL) In order to meet OEPA Permit Section 1.3.6 requirements, which addresses TMDL approved watersheds, the following issues need to be addressed by Mill Creek MetroParks:</p> <ol style="list-style-type: none"> Determine whether any Mill Creek MetroParks facility is located within a TMDL watershed. Determine what pollutants and sources of pollutants are present in the TMDL watershed. Determine whether Mill Creek MetroParks is a "Significant Contributor" of pollutants that are present in the TMDL watershed. <ul style="list-style-type: none"> If the Mill Creek MetroParks is not a significant contributor, Mill Creek MetroParks should be able to demonstrate how they came to this conclusion. If Mill Creek MetroParks is a significant contributor, develop strategies to achieve necessary pollution reduction within the impaired stream segment(s). <p>Mill Creek MetroParks should be able to demonstrate how they determined the amount of pollutant needed to be reduced within the impaired stream segment(s), and how much pollutant was reduced (i.e., water sampling to verify the amounts removed).</p>	<ol style="list-style-type: none"> County's consultant currently has a system in place to identify the TMDL watersheds located throughout the county. Began development of regulated areas which overlay on top of TMDL watershed. Table includes approved and pending approval TMDLs only. 	<ol style="list-style-type: none"> BMP 3.5 addresses permit section 1.3.6. OEPA Construction General Permit. 	<p>Complete TMDL map correlating OEPA approved TMDL watersheds in relationship to County and townships regulated areas. Complete table identifying TMDL pollutants of concern. TMDL watersheds have been located within the regulated areas of OTC. Pollutants and sources for these areas have been identified.</p> <ol style="list-style-type: none"> Provide information/assistance for Mahoning County to complete TMDL layer development for the storm water Base Map. Provide assistance to assist Mahoning County with completing TMDL table. Table will include the following: <ul style="list-style-type: none"> ✓ TMDL HUC code and stream name. ✓ General Description of location. ✓ Summary of causes and sources. Investigate and document Township potential sources as identified in TMDL. Document all assumptions made during potential source assessments. Assist through Township Storm Water Management Committee with drafting outline of process to be developed in Year 5 of permit term which preliminary procedures to be implemented to address identified sources on a planning and project basis. Determine how BMP will be evaluated and assessed. Document assessment rational for reporting. 	<ol style="list-style-type: none"> Present map and table to storm water management committee for review and comment. Review updated Mahoning County Drainage Manual for potential edits based on completed mapping and tables. Table to show both approved and pending TMDLs, which correlate with regulated MS 4 areas.

MILL CREEK METROPARKS YEAR 2 ANNUAL REPORT

Table 3: Construction Site Storm Water Control Plan Minimum Control Measure 4

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
4.1	<p>Adopt erosion and sediment control zoning resolutions</p>	<p>Implement updated inspection program and incorporate revisions to specifications and details.</p> <p>Year 2 to Year 5: Track, assess, evaluate and modify as needed selected BMP's associated with Inspection Program.</p> <p>Gain an understanding of OEPA's updated Construction storm water permit for both construction and post-construction BMP requirements.</p> <p>1. Mahoning County Engineers office and Mahoning County Soil and Water Conservation District completed development of <i>Mahoning County Drainage and Sediment Control Manual- Year 2 (2004)</i>. Manual includes:</p> <ul style="list-style-type: none"> ✓ Drainage Design and Engineering ✓ Storm Drainage Systems ✓ Post-Construction Storm Water Management Requirements ✓ Storm Water Pollution Prevention plans and Erosion and sediment Control Requirements <p>Current Flood Plain Regulations.</p>	<p>Soil erosion and sediment control specification and construction details were incorporated into MetroParks contract documents. Erosion and sediment control practices were carried out on construction projects by MetroParks personnel.</p> <p>Review erosion and sediment control specifications: Existing details, specifications and inspection practices for construction projects will be reviewed and revised, as necessary.</p> <p>1. Mahoning County has developed E&SC Regulations. The E&SC Regulations are included in the revised and updated <i>Mahoning County Drainage and Sediment Control Manual</i>.</p> <p>2. Resolution from the Mahoning County Commissioners adopting the revised/updated Drainage Criteria and Erosion & Sediment Control Manual will be in place spring 2005.</p>	<p>1. BMP 4.1 Addresses permit sections:</p> <ul style="list-style-type: none"> ✓ 3.2.4.1.1 ✓ 3.2.4.1.2 ✓ 3.2.4.1.3 ✓ 3.2.4.1.4 ✓ 3.2.4.1.6 ✓ 3.2.4.2.1 ✓ 3.2.4.2.2 ✓ 3.2.4.2.3 <p>2. OEPA Construction General Permit (CGP).</p>	<p>Continue to include soil erosion and sediment control specifications and details in all construction projects. Once the regulations for Mahoning County have been updated, the new regulations will be incorporated into all construction projects. Soil erosion and sediment control specification and construction details were incorporated into MetroParks contract documents. Erosion and sediment control practices were carried out on construction projects by MetroParks personnel.</p> <ol style="list-style-type: none"> 1. Review current Township regulations/resolutions governing Erosion and Sediment Control. 2. Determine necessary modifications to current resolution/regulation in order to adopt <i>Mahoning County Drainage and Erosion and Sediment Control Manual</i> as the Township design manual. 3. Identify potential areas of Manual which from the Township perspective may need to be updated to fit Township requirements. 4. Implement the new requirements contained within the revised/updated Drainage Criteria and Erosion & Sediment Control Manual. 5. Develop necessary support forms, checklists to aid in plan review. 6. Determine how BMP will be evaluated and assessed. 7. Document assessment rational for reporting. 	<p>Continue to include soil erosion and sediment control specifications and details in all construction projects. Once the regulations for Mahoning County have been updated, the new regulations will be incorporated into all construction projects.</p> <ol style="list-style-type: none"> 1. Mahoning County will provide updates/revisions to the Manual periodically based on reviews of actual Manual concepts implemented in the field. 2. Mahoning County will consider Manual user suggestions and feedback on improving Manual content and applicability. 3. Support Mahoning County in conducting Manual workshops.

MILL CREEK METROPARKS YEAR 2 ANNUAL REPORT

Table 3: Construction Site Storm Water Control Plan Minimum Control Measure 4

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
4.2	Workshops on E&SC Resolutions	<p>Confirm hosting one Erosion/Sediment control workshop in Year s 2 to 5. Draft workshop schedule.</p> <p>Workshop on E&SC Regulations: The County will provide workshops on erosion and sediment control best management practices, how to comply with the regulations, and other information relevant to developers/contractors.</p> <p>1. SWCD held multiple site specific workshops and presentations related to Erosion and Sediment Control.</p>	<p>SWCD provided numerous brief, audience-specific workshops/presentations on E&SC as requested during Year 2. Significant time and effort by SWCD went into the preparation of the soon to be adopted Mahoning County E&SC Regulations.</p> <p>1. On-site workshops were conducted as contractors and builders had questions relating to ESC practices arose during construction.</p> <p>2. Significant time and effort by SWCD went into the preparation of the soon to be adopted Mahoning County E&SC Regulations.</p>	<p>1. See BMP 4.1 for permit sections.</p>	<p>Workshops will be provided in Year 3 with emphasis on the soon-to-be-adopted Mahoning County E&SC Regulations.</p> <p>1. 2 – Half-day workshops will be scheduled in connection with how to use the updated manual.</p> <p>2. TSWMC will develop and provide an estimated 2 workshops on erosion and sediment control BMPs in Year 3. Content includes - How to comply with the revised resolutions and how to use the updated manual?</p> <p>3. Assist County SWMC with developing County and Township relevant Storm water fact sheets.</p> <p>4. Develop method to track and document workshop attendance.</p> <p>5. Develop a schedule for completing workshop material and also a schedule for updating workshop materials.</p>	<p>Publish workshop on web page.</p> <p>1. Publish workshop on web page.</p> <p>2. Complete workshop material development.</p>

MILL CREEK METROPARKS YEAR 2 ANNUAL REPORT

Table 3: Construction Site Storm Water Control Plan Minimum Control Measure 4

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
4.3	Enter into Memorandum of Understanding (MOU) with Mahoning SWCD	<p>Year 2 to Year 5: Document and track effectiveness for reporting purposes. Revise BMP as necessary.</p> <p>Determine value for MetroParks to develop and draft our own Storm water manual/construction Erosion and sedimentation requirements and drainage requirements.</p> <p>Concrete Truck Wash Out:</p> <ul style="list-style-type: none"> Continue the existing procedures regulating concrete truck washout for MetroParks projects. <p>Develop specifications for concrete truck washout for contract projects.</p> <ol style="list-style-type: none"> MOU Review and update completed in Year 2. Mahoning County SWCD will continue to provide site plan review and Site erosion control inspection. MOU provides guidance in delegating SWCD services in relation to Mahoning County Storm Water Plan Compliance 	<p>Specifications and construction details were prepared for procedures governing concrete truck wash out. Storm water manual specific for the MetroParks was determined not to be necessary.</p> <p>Specifications and construction details were prepared for procedures governing concrete truck wash out. Storm water manual specific for the MetroParks was determined not to be necessary.</p> <ol style="list-style-type: none"> MOU developed and signed between SWCD and the Mahoning County Engineer's Office, outlining cooperative duties/services provided by each entity. 	<ol style="list-style-type: none"> BMP 4.3 addresses permit sections 3.2.4.2.2 and 3.2.4.3.4. 	<p>Include specifications and construction details in all applicable projects.</p> <ol style="list-style-type: none"> Review MOU language and update as necessary throughout Year 3. Consider alternative/backup based on SWCD availability in Year s 3- 5 of the permit. 	<p>Continue to include specifications and construction details in all applicable projects.</p> <ol style="list-style-type: none"> Document MOU changes as necessary.

MILL CREEK METROPARKS YEAR 2 ANNUAL REPORT
Table 4: Post-Construction Storm Water Minimum Control Measure 5

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
5.1	Workshops for Post-Construction Regulations Note: BMP name change	Develop standards for riparian area management. Identify riparian areas that could be targeted for preservation. Year 2 to Year 5: Track the number and linear feet of riparian areas preserved. Review current park storm water facilities and develop list of Post-Construction identified BMP's for credit and maintenance requirements. 1. SWCD held multiple site specific workshops and presentations related to Erosion and Sediment Control. 2. 2 – Half-day workshops will be scheduled in connection with how to use the updated manual. 3. Complete updates to Drainage and Sediment and Erosion Control Manual, which included Post-Construction BMP's. Note: Workshops for Year 2 were sediment/Erosion control focused.	Continued partnership with SWCD in pursuing riparian easements. Riparian easements were secured on 93.97 acres in 2004. Riparian and Wetland Setbacks: The County and Townships will explore adopting zoning regulations creating setbacks from certain watercourses and wetlands. Mill Creek MetroParks can assist the County and Townships in developing set-back ordinances and implementing riparian preservation. 1. On-site workshops were conducted as contractors and builders had questions relating to ESC practices arose during construction. 2. Significant time and effort by SWCD went into the preparation of the soon to be adopted Mahoning County E&SC Regulations. Note: Year 3- workshops will be modified to accommodate Post-Construction Controls.	1. BMP 5.2 addresses permit section 3.2.5.2.3.3. 2. Construction General Permit.	Develop database for riparian easements. Continue to identify and pursue riparian areas that could be targeted for preservation through easements. Track the acreage and linear feet of riparian areas preserved. Continued partnership with SWCD in pursuing riparian easements. Riparian easements were secured on 93.97 acres in 2004. 1. Develop materials and schedule a minimum of 2 workshops focused on Mahoning County's Post-Construction BMP's. 2. Develop schedule to perform reviews and updates of workshop materials. 3. Determine how BMP will be evaluated and assessed. 4. Document assessment rational for reporting. 5. Determine how to track workshop attendance and update workshop materials as necessary.	Develop database for riparian easements. Continue to identify and pursue riparian areas that could be targeted for preservation through easements. Track the acreage and linear feet of riparian areas preserved. 1. Investigate and identify location or sources that developers, contractors, engineers, builders and public can go to access information on Post-Construction storm water management BMP's.

MILL CREEK METROPARKS YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 6

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
6.1	Operation and maintenance program to prevent or reduce storm water pollution from community operations.	Develop method to track and report on noted violations, action taken. Operation and maintenance program to prevent or reduce storm water pollution from community operations: This Operation and Maintenance program will cover the activities listed in the MS4 permit section 3.2.6.	MetroParks Police conducted a property line inspection of all MetroParks properties, looking for illegal dumping. Police continually monitor MetroParks waterways for any noxious or offensive material. Enforcement by issuance of minor misdemeanor and notification of proper regulatory agency. One complaint received of possible dumping of chemicals into Indian Run. Ohio EPA was immediately contacted and advised.	1. BMP 6.1 addresses permit section 3.2.6 through 3.2.6.2.5	Continue with practices established and report on noted violations and action taken.	Continue with practices established and report on noted violations and action taken.
6.2	Staff education program on pollution prevention	Complete O/M review scheduled for Year 1. Develop training needs. Determine training schedule Develop training materials. Staff education program on pollution prevention: Identify potential sources of pollution resulting from daily maintenance operations. Train all appropriate staff in proper methods of pollution reduction, reporting and tracking.	Identification of pollution and training in pollution reduction, reporting and tracking continues on an ongoing basis.	1. BMP 6.2 addresses permit section 3.2.6.1.1 and 3.2.6.1.2.	Continue staff education and training procedures.	Continue staff education and training procedures.
6.3	Street Sweeping	Complete Street sweeping procedural development. Documents linear feet swept, frequency, volume collected. Street Sweeping: Develop written procedures and specifications for street sweeping and disposal of spoils.	Annual street sweeping completed May 17, 2004 by contractor. 21 miles of drives and numerous parking lots were swept. Spoils hauled to MetroParks service facility and stockpiled. Manifesto received from contractor.	1. BMP 6.3 addresses permit sections: ✓ 3.2.6.2.1 ✓ 3.2.6.2.3.1 ✓ 3.2.6.2.3.2 ✓ 3.2.6.2.3.3 ✓ 3.2.6.2.3.4 ✓ 3.2.6.2.4 ✓ 3.2.6.2.5	Continue annual street sweeping program and fall leaf blowing procedures. Fall leaves and tree debris are blown off roadways and dispersed evenly into adjacent natural areas.	Continue annual street sweeping program and fall leaf blowing procedures.

MILL CREEK METROPARKS YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 6

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
6.4	Litter Pickup	Year 2 to Year 3: Develop and document a process to identify areas where trash collected. Year 2 to Year 5: Track quantity collected, evaluate and modify BMP as necessary. Document effectiveness.	Daily trash pick-up accomplished. Tracking of number of trash bags collected from recreation facilities begun in 2004. Additional recycle containers placed around MetroParks. Litter Pickup: An annual pickup program is held. Continue daily litter pick-up; Track trash and recycled material quantities.	1. BMP 6.4 addresses permit section 3.2.6.2.3.2	Continue daily litter pickup program. Identification of areas where trash is collected is not necessary, since litter is picked up from all park properties. Very successful program.	Continue daily litter pickup program.
6.5	Salt Storage and Applications	Year 1 to Year 5: Document current storage drainage Draft salt storage procedures. Document application procedures and procedures for clean up Track and evaluate the BMP and document effectiveness. Salt Storage and Applications: The MetroParks applies de-icing materials based on road conditions. Salt is currently stored in a salt dome.	Salt storage is within enclosed, contained dome. Salt handling procedures were evaluated and included in maintenance department handbook. Employees educated on use and clean-up procedures. Site map was developed showing storage facility in relationship to nearest receiving stream.	1. BMP 6.5 addresses permit sections: ✓ 3.2.6.2.1 ✓ 3.2.6.2.3.1 ✓ 3.2.6.2.3.2 ✓ 3.2.6.2.3.3 ✓ 3.2.6.2.3.4 ✓ 3.2.6.2.4 ✓ 3.2.6.2.5	Continue education of employees and proper procedures.	Continue education of employees and proper procedures.
6.6	Mowing Practices	Year 2 to Year 5: Implement any revised mowing procedures. Track and evaluate the BMP and document effectiveness for report. Mowing Practices: Mowing of lawn areas and roadsides to 3" height on weekly basis.	Mowing of most park areas at 3" height on weekly basis. Some areas left to naturalize for annual mowing only. Areas at Fellows Gardens mowed weekly at 2 ½ -3" height. Procedures established for washout of mowing equipment.	1. BMP 6.6 addresses permit section 3.2.6.2.3.1	Year 2 to Year 5: Implement any revised mowing procedures. Track and evaluate the BMP and document effectiveness for report.	Track and evaluate the BMP and document effectiveness for report.
6.7	Storm Water System Maintenance	Develop method to report number clean out. Estimated volume of material removed. Proper disposal.	No ditch maintenance was conducted. Various catch basins were cleaned out. Storm Water System Maintenance: Ditch maintenance is minimal. Material is stored and used as fill where and when needed. Catch basins are periodically cleaned out.	1. BMP 6.7 addresses permit sections: ✓ 3.2.6.2.1 ✓ 3.2.6.2.3.1 ✓ 3.2.6.2.3.2 ✓ 3.2.6.2.3.3 ✓ 3.2.6.2.3.4 ✓ 3.2.6.2.4 ✓ 3.2.6.2.5	Continue clean out maintenance as needed. Mill Creek Metro Parks completed compliance conditions by conducting catch basin clean outs.	Continue clean out maintenance as needed.

MILL CREEK METROPARKS YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 6

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
6.8	Storage of construction materials and disposal of spoil	Develop method to report Estimated volume of material removed. Proper disposal. Storage of construction materials and disposal of spoil: 1. Ditch spoils are transported to service facility and used as fill where and when needed. 2. Construction debris is taken to the BFI landfill.	Materials were stored to minimize run off. General construction debris deposited directly into enclosed dumpster and dumpster taken to landfill when full.	1. BMP 6.8 addresses permit section 3.2.6.2.3.3	Continue proper storage and disposal methods. Mill Creek Metro Parks completed compliance conditions by conducting containment of construction debris.	Continue proper storage and disposal methods.
6.9	Fleet Maintenance	Year 2 : Develop a vehicle wash area, and program to document amount of vehicle fluids recycled and disposed of. Track and evaluate BMP and document effectiveness. Fleet Maintenance: Review current vehicle washing and maintenance bay drainage. Develop procedures to track and report on the handling of vehicle fluids, tires, and batteries. Vehicle maintenance and washing shall take place in an appropriate area.	New wash facility/bay used exclusively for all washing of vehicles. Run-off to oil/water separator system. All fluids and tires disposed of in proper manner. Old batteries were recycled. Manifesto's for disposal of material kept on file.	1. BMP 6.9 addresses permit sections: ✓ 3.2.6.2.1 ✓ 3.2.6.2.3.1 ✓ 3.2.6.2.3.2 ✓ 3.2.6.2.3.3 ✓ 3.2.6.2.3.4 ✓ 3.2.6.2.4 ✓ 3.2.6.2.5	Continue current fleet maintenance procedures. New wash facility/bay used exclusively for all washing of vehicles. Run-off to oil/water separator system. All fluids and tires disposed of in proper manner. Old batteries were recycled. Manifesto's for disposal of material kept on file.	Continue current fleet maintenance procedures.
6.10	Recycling/Separation/Disposal	Year 2 to Year 5: Track and evaluate BMP and document effectiveness. Develop means of reporting quantities. Recycling/Separation/Disposal: Bottles and cans from refuse container throughout the MetroParks are recycled. Collected tree leaves are bartered to CBS Topsoil. All petroleum products are recycled. Green Team sponsored recycling at facilities.	Recycling program in place for paper, aluminum cans, and glass. Leaves were composted for re-use in planting beds. Recycle containers available at numerous locations throughout MetroParks.	1. BMP 6.10 addresses permit sections: ✓ 3.2.6.2.1 ✓ 3.2.6.2.3.1 ✓ 3.2.6.2.3.2 ✓ 3.2.6.2.3.3 ✓ 3.2.6.2.3.4 ✓ 3.2.6.2.4 ✓ 3.2.6.2.5	Continue current recycling and disposal methods. Recycling program in place for paper, aluminum cans, and glass. Leaves were composted for re-use in planting beds. Recycle containers available at numerous locations throughout Metro Parks.	Track and evaluate BMP and document effectiveness.

MILL CREEK METROPARKS YEAR 2 ANNUAL REPORT

Table 5: Pollution Prevention and Good Housekeeping Plan Minimum Control Measure 6

ID	Best Management Practice	Permit Year 2004 Year 2 Objective(s) and Achievements	Status of Measurable Goal	Compliance with Permit Conditions	Permit Year 2005 Year 3 Objective	Year 3 BMP Implementation Activity
6.11	Oil and Water Separators	Year 2 to Year 5: Track and evaluate amounts cleaned and assess the effectiveness of the BMP. Oil and Water Separators: Oil & Water Separator to be cleaned out by outside vendors.	Oil & water separator system in place at both service facilities. Both separators were cleaned this year and materials were properly disposed of by waste company. Manifesto's for disposal of materials kept on file.	1. BMP 6.11 addresses permit sections: ✓ 3.2.6.2.1 ✓ 3.2.6.2.3.1 ✓ 3.2.6.2.3.2 ✓ 3.2.6.2.3.3 ✓ 3.2.6.2.3.4 ✓ 3.2.6.2.4 ✓ 3.2.6.2.5	Continue current procedures for inspection and maintenance of oil/water separators. Oil & water separator system in place at both service facilities. Both separators were cleaned this year and materials were properly disposed of by waste company. Manifesto's for disposal of materials kept on file.	Continue current procedures for inspection and maintenance of oil/water separators.
6.12	Herbicide and Pesticides	Year 2 to Year 5: Track and evaluate amount of materials applied. : Herbicide and Pesticide handling/application training accomplished under requirements of pesticide applicators license.	Employees maintained valid public operator licenses for pesticide application from the Ohio Department of Agriculture. All use of chemicals was documented and kept on file. Application rates were reviewed at each application.		Continue with herbicide and pesticide training, procedures and documentation. Employees maintained valid public operator licenses for pesticide application from the Ohio Department of Agriculture. All use of chemicals was documented and kept on file. Application rates were reviewed at each application.	Continue with herbicide and pesticide training, procedures and documentation.
6.13	Spill Management Procedures	Review spill management procedures and update as needed. Spill Management Procedures: Spill controlled by absorbent pads and tubes. Disposal by proper method. Spill response includes absorbent mats to catch oil and gasoline spills.	Procedures reviewed at monthly safety meetings. Pads and pillows made available.	1. Procedures used are those approved by the Mahoning County Hazmat Department and the Austintown Fire Department.	Continue spill management procedures and education to employees. Procedures reviewed at monthly safety meetings. Pads and pillows made available.	Continue spill management procedures and education to employees.

Appendix A

OEPA Comment Table

**Mahoning County
Storm Water Management
Year 2 Annual Report
Ohio Environmental Protection Agency (OEPA) Storm Water Management Plan Review Comments Summary**

OEPA Permit Section Number and Checklist Item	OEPA - Review Comments	Year 2- Annual Report Section- Comment Response
3.2.1 Public Education and Outreach		
3.2.2.2.1 - SWMP describes how many people are expected to be reached over the permit term	1. Recommends that more than 1 mechanism be implemented.	1. BMP's - 1.2 Public/Private Involvement, 1.3 Newsletters, 1.4 Storm Water Education Programs, 1.6 Community Activities, 1.7 Brochures, Flyers and Factsheets.
	2. Recommends programs reach minimum of 50% of population.	1. BMP's - 1.2 Public/Private Involvement, 1.3 Newsletters, 1.4 Storm Water Education Programs, 1.6 Community Activities, 1.7 Brochures, Flyers and Factsheets.
	3. Recommendation to target at least 5 different storm water themes/messages over first permit term.	1. BMP's - 1.2 Public/Private Involvement, 1.3 Newsletters, 1.4 Storm Water Education Programs, 1.6 Community Activities, 1.7 Brochures, Flyers and Factsheets.
3.2.2 Public Involvement and Participation		
3.2.2.2.5 - If relying on another entity, SWMP includes written acceptance of this obligation	1. Memorandum of Understanding w/ Soil and Water Conservation District.	1. BMP - 4.3 Memorandum of Understanding w/ SWCD.
3.2.3 Illicit Discharge and Elimination		
3.2.3.2.2.- Ordinance or other regulatory mechanism - Enforcement	1. Recommends ordinance allows for access to private property to investigate illicit discharges.	1. BMP - 3.3 Develop program to detect and eliminate illicit discharges.
3.2.3.2.4 - Detection/Elimination Plan:		
1.) Dry weather field screening,	1. Develop plan should call for screening of 100% of outfalls in first permit term.	1. BMP - 3.3 Develop program to detect and eliminate illicit discharges.
2.) Describes procedures for locating priority areas or ambient sampling,	2. Areas w/ older sanitary sewer lines or no sanitary sewers be considered high priority areas.	1. BMP - 3.3 Develop program to detect and eliminate illicit discharges.
3.) Describe procedures for removing sources,	3. Plan should provide for @ least 1 written Notice of Violation (NOV) or equivalent which states violation and time frame for elimination.	1. BMP - 3.4 Adopt regulations prohibiting illicit discharges.
4.) Describe procedures for program evaluation/assessment	4. Establish a log of reported and/or detected illicit discharges or other similar method, status should be noted as well.	1. BMP - 3.3 Develop program to detect and eliminate illicit discharges.
3.2.3.2.6 - If relying on another entity, SWMP includes written acceptance of this obligation	Memorandum of Understanding w/ District Board of Health	1. BMP - 1.2 Public/Private Involvement
3.2.4 Construction Site Storm Water Runoff Control		
3.2.4.2.1 - Ordinance or other regulatory mechanism	1. Ordinance to be at least as stringent as criteria set forth in most current OEPA General Storm Water NPDES Construction permit.	1. Mahoning County Engineers- Developed <i>Mahoning County Drainage and Erosion and Sedimentation Controls</i> . January 2005.
3.2.4.2.2 - SWMP includes sanctions and enforcement procedures to ensure compliance	1. Recommends one of the following sanctions and enforcement procedures to ensure compliance: a. Stop Work Order b. Notice of Violation c. Fines d. Bonding Requirements	1. BMP 4.1 Adopt enhanced erosion and sediment control regulations
3.2.4.2.5 - Procedures for receipt and consideration of information submitted form public.	1. Program should incorporate procedures to perform complaint investigations, including methods to track actions taken and resolution of complaint.	1. BMP - 4.6 Enforcement Actions, 4.7 Respond to Public Complaints
3.2.4.2.6 - Procedures for Site Inspection	1. Sites inspections to be performed once per week	1. BMP 4.5 Inspect Active sites
3.2.5 Post-Construction Storm Water Management		
3.2.5.2.5 - Ordinance or other regulatory mechanism - Does ordinance provide for both structural and non-structural BMP's.	1. Non-structural BMP's:	
	a. Policies to direct growth to identified areas. b. Ordinances that protect sensitive areas. c. Policies that minimize impervious areas. d. Policies that minimize disturbance of soil. e. Policies that encourage infill development/high urban areas/existing storm infrastructure. f. Source control measures (Good Housekeeping, Preventative maintenance, spill prevention). g. Educations programs for developers and public about designs that minimize water quality impacts.	1. Mahoning County Engineers- Developed <i>Mahoning County Drainage and Erosion and Sedimentation Controls</i> . January 2005.
	2. Structural BMP's:	
	a. Storage Practices b. Filtration Practices c. Infiltration Practices d. Treatment Practices	1. Mahoning County Engineers- Developed <i>Mahoning County Drainage and Erosion and Sedimentation Controls</i> . January 2005.
	3. Post-Construction BMP maintenance once per year	1. Mahoning County Engineers- Developed <i>Mahoning County Drainage and Erosion and Sedimentation Controls</i> . January 2005.
3.2.6 Pollution Prevention and Good Housekeeping		
3.2.6.2.2 - Employee training program to prevent or reduce strom water pollution	1. 1-Training per year be performed.	1. BMP 4.2 Workshops