

CITY OF CANTON, OHIO

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PHASE II



STORM WATER MANAGEMENT PROGRAM (SWMP)

Municipal Separate Storm Sewer System (MS4) Operator:

City of Canton, Ohio
218 Cleveland Ave. SW – 8th Floor
Canton, Ohio 44702
330-438-4307

Attention: Director of Public Service

Ohio EPA NPDES General Permit: OHQ000002

Storm Water Associated with: Small MS4 NOI

Issuance Date: 1/30/2009

Effective Date: 1/30/2009

Expiration Date: 1/29/2014

City of Canton General Permit Approval Date: 6/4/2009

Ohio EPA Facility Permit Number: 3GQ00072*BG

Prepared by: Christopher D. Barnes, PE, CPESC, CPSWQ - Assistant City Engineer

Revisions: (SWMP revision dates are noted accordingly within)

Cover Revisions: 2/22/11

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Certification:

This certification is provided pursuant to the submission of the City of Canton's current Storm Water Management Program to Ohio EPA.

In accordance with the signatory requirements of Part V.G.4. of the permit, the following certification is provided:

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

Warren Price
City of Canton Service Director

Date

CITY OF CANTON, OHIO NPDES PHASE II SWMP

Table A

TABLE OF ORGANIZATION

(per Permit Part III.A.1.d.)

Overview of Departments and Responsible Positions with Considerable Involvement in SWMP Minimum Control Measures

Overall Authority	Department	Division	Responsible Position ¹	Minimum Control Measure Involvement						Total BMPs
				MCM#(# of BMPs Involved In) ²						
Mayor	Mayor's Administration		Mayor	1(0)	2(0)	3(0)	4(0)	5(0)	6(0)	0
Mayor	Mayor's Administration		Management Assistant	1(0)	2(1)	3(0)	4(0)	5(0)	6(0)	1
Mayor	Mayor's Administration		Service Director	1(0)	2(0)	3(0)	4(0)	5(0)	6(1)	1
Service Director	Building Maintenance		Supervisor	1(1)	2(0)	3(0)	4(0)	5(0)	6(2)	3
Service Director	Civic Center		Manager	1(1)	2(0)	3(0)	4(0)	5(0)	6(2)	3
Service Director	Collection Systems		Superintendent	1(1)	2(0)	3(2)	4(0)	5(0)	6(5)	8
Service Director	Development		Director	1(0)	2(1)	3(0)	4(0)	5(2)	6(0)	3
Service Director	Division of Motor Vehicles		Superintendent	1(1)	2(0)	3(0)	4(0)	5(0)	6(6)	7
Service Director	Sanitation		Superintendent	1(2)	2(0)	3(0)	4(0)	5(0)	6(1)	3
Service Director	Street		Superintendent	1(1)	2(1)	3(0)	4(0)	5(0)	6(11)	13
Service Director	Water		Superintendent	1(1)	2(0)	3(0)	4(0)	5(0)	6(5)	6
Service Director	Water Reclamation Facility		Superintendent	1(1)	2(0)	3(0)	4(0)	5(0)	6(5)	6
Service Director	Engineering		City Engineer	1(1)	2(0)	3(8)	4(2)	5(6)	6(2)	19
City Engineer	Engineering	Civil	Assistant City Engineer	1(2)	2(0)	3(2)	4(0)	5(0)	6(0)	4
City Engineer	Engineering	Traffic	Assistant City Engineer	1(0)	2(0)	3(0)	4(0)	5(0)	6(3)	3
Mayor	Mayor's Administration		Safety Director	1(0)	2(0)	3(0)	4(0)	5(0)	6(0)	0
Safety Director	Building	Zoning	Zoning Inspector	1(0)	2(0)	3(0)	4(0)	5(2)	6(0)	2
Safety Director	Fire		Chief	1(1)	2(0)	3(0)	4(0)	5(0)	6(6)	7
Safety Director	Police	Impound	Lieutenant	1(1)	2(0)	3(0)	4(0)	5(0)	6(2)	3
Board of Health	Health	Environmental Health	Environmental Health Director	1(1)	2(0)	3(5)	4(0)	5(0)	6(0)	6
Judges	Judges	Community Service	Community Service Director	1(0)	2(1)	3(0)	4(0)	5(0)	6(0)	1
Park Commission	Park		Director	1(1)	2(1)	3(0)	4(0)	5(1)	6(4)	7
Joint Recreation District	Recreation		Director	1(1)	2(0)	3(0)	4(0)	5(0)	6(2)	3
Stark County	SWCD		Urban Resource Coordinator	1(1)	2(0)	3(0)	4(3)	5(3)	6(0)	7

Footnotes:
 1 – See Table B for Responsible Position contact information
 2 – See MCM Departmental Involvement Tables in each Minimum Control Measure section for specific BMPs in which Involvement of Responsible Positions occurs.

SWMP Primary Point of Contact:
 Christopher D. Barnes, PE, CPESC, CPSWQ – Assistant City Engineer
 Engineering Department – Civil Division
 2436 30th St NE – Building A
 Canton, Ohio 44705
 Phone (main): 330-489-3381
 Phone (direct): 330-438-6908
 Fax: 330-489-3337
 Email: chris.barnes@cantonohio.gov

CITY OF CANTON, OHIO NPDES PHASE II SWMP

Table B
RESPONSIBLE POSITION CONTACT INFORMATION
Summary of Responsible Positions and Associated Contact Information

Department	Division	Responsible Position¹	Name²	Phone #	Email
Mayor's Administration		Mayor	William J. Healy II	330-438-4300	healy@cantonohio.gov
Mayor's Administration		Management Assistant	Derek Gordon	330-438-4305	derek.gordon@cantonohio.gov
Mayor's Administration		Service Director	Warren Price	330-438-4309	warren.price@cantonohio.gov
Building Maintenance		Supervisor	C. Daniel Millsap	330-438-4191	daniel.millsap@cantonohio.gov
Civic Center		Manager	Geoff Tompkins	330-438-6179	geoff.tompkins@cantonohio.gov
Collection Systems		Superintendent	Jim DiMarzio	330-438-6941	james.dimarzio@cantonohio.gov
Development		Director	Robert Torres	330-438-4123	robert.torres@cantonohio.gov
Division of Motor Vehicles		Superintendent	Don Heath	330-438-6959	don.heath@cantonohio.gov
Sanitation		Superintendent	Byron Carson	330-438-6977	byron.carson@cantonohio.gov
Street		Superintendent	Kevin Monroe	330-438-6961	kevin.monroe@cantonohio.gov
Water		Superintendent	Tyler Converse	330-438-6574	tyler.converse@cantonohio.gov
Water Reclamation Facility		Superintendent	Tracy Mills	330-438-4803	tracy.mills@cantonohio.gov
Engineering		City Engineer	Dan Moeglin	330-438-6903	dan.moeglin@cantonohio.gov
Engineering	Civil	Assistant City Engineer	Chris Barnes	330-438-6908	chris.barnes@cantonohio.gov
Engineering	Traffic	Assistant City Engineer	Nick Loukas	330-438-6920	nick.loukas@cantonohio.gov
Mayor's Administration		Safety Director	Tom Ream	330-438-4312	thomas.ream@cantonohio.gov
Building	Zoning	Zoning Inspector	Darla Hinderer	330-438-4726	darla.hinderer@cantonohio.gov
Fire		Chief	John Whitlach	330-438-4540	john.whitlach@cantonohio.gov
Police	Impound	Lieutenant	John Rubis	330-438-4485	john.rubis@cantonohio.gov
Health	Environmental Health	Environmental Health Director	Mark Adams	330-438-4641	madams@cantonhealth.org
Judges	Community Service	Community Service Director	Lindsay Trent	330-438-4214	lindsay.trent@cantonohio.gov
Park		Director	Doug Perry	330-438-6981	doug.perry@cantonohio.gov
Recreation		Director	Nadine Sawaya	330-438-4894	nadine@cantonrecreation.com
(Stark County)	SWCD	Urban Resource Coordinator	Julie Berbari	330-830-7700	julie.berbari@starkswcd.org

Footnotes:

1 – See Table A for overview of Responsible Position's involvement in implementing the Storm Water Management Program's 6 Minimum Control Measures

2 – Some internal delegation may occur in which other persons are held responsible by listed person to implement certain BMPs and provide associated Annual Report information

CITY OF CANTON, OHIO NPDES PHASE II SWMP

1 **Minimum Control Measure (MCM) #1: Public Education and Outreach on Storm Water Impacts**

“Storm Water Public Education and Outreach Program”: Overview

MCM PERMIT REQUIREMENTS:

Permit Part III.B.1.a.: [City of Canton] shall implement a public education program to distribute educational materials to the community or conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps that the public can take to reduce pollutants in storm water runoff.

DECISION PROCESS (RATIONALE STATEMENT) FOR DEVELOPMENT OF STORM WATER PUBLIC EDUCATION AND OUTREACH PROGRAM:

Permit Part III.B.1.b.: [City of Canton] shall document [its] decision process for the development of a storm water public education and outreach program. [City of Canton's] rationale statement shall address both [its] overall public education program and the individual BMPs, measurable goals, and responsible persons for [its] program.

Response: The City of Canton supports EPA's assessment that an informed and knowledgeable community is crucial to the success of a SWMP since it helps ensure the following: (1) "Greater support" for the program as the public gains a greater understanding of the reasons why it is necessary and important; and (2) "Greater compliance" with the program as the public becomes aware of the personal responsibilities expected of them and others in the community, including the individual actions they can take to protect or improve the quality of area waters. See USEPA's Stormwater Phase II Final Rule Fact Sheet Series at <http://cfpub.epa.gov/npdes/stormwater/swfinal.cfm> for further information on the NPDES Phase II Small MS4 Storm Water Program and the associated Minimum Control Measures. The City of Canton is to implement the BMPs described below as part of its Storm Water Public Education Program. The identified BMPs are those that the City believes are needed to meet permit requirements and/or expectations. See "Public Education and Outreach on Stormwater Impacts" on USEPA's National Menu of Stormwater Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/> for further BMP guidance and information.

Revisions: 2/1/11

Permit Part III.B.1.b.: The rationale statement shall include the following information, at a minimum:

Permit Part III.B.1.b.i.: How [City of Canton] plans to inform individuals and households about the steps they can take to reduce storm water pollution.

Response: Publications, flyers, the City's website, and other mechanisms (as they become available and feasible to utilize) are to be used to inform individuals and households about the steps that can be taken to reduce storm water pollution. There are other means within the City, such as eco-sensitive messages on storm sewer inlets and "No Dumping" signs to make people aware of and/or provide warnings of actions that could potentially result in surface water pollution. See BMPs below for further details.

Revisions: 2/1/11

Permit Part III.B.1.b.ii.: How [City of Canton] plans to inform individuals and groups on how to become involved in the storm water program (with activities such as local stream and beach restoration activities).

Response: Publications, flyers, the City's website, and other mechanisms (as they become available and feasible to utilize) are to be used to inform individuals and groups on how to become involved in the storm water program (with activities such as local stream cleanups, meetings, etc.). See BMPs below for further details.

Revisions: 2/1/11

Permit Part III.B.1.b.iii.: Who are the target audiences for [City of Canton's] education program who are likely to have significant storm water impacts (including commercial, industrial, and institutional entities) and why those target audiences were selected.

Response: The City of Canton is mostly comprised of residential, commercial, industrial, and institutional entities, and as such, these are likely to have significant storm water impacts and therefore are the intended target audiences for the Public Education and Outreach Program. However, each BMP listed below lists the specific target audience it is intended to reach.

Revisions: 2/1/11

Permit Part III.B.1.b.iv.: What are the target pollutant sources [City of Canton's] public education program is designed to address.

Response: The City of Canton is located partly or completely within the "East Branch Nimishillen Creek", "West Branch Nimishillen Creek", "City of Canton - Middle Branch Nimishillen Creek", "Sherrick Run - Nimishillen Creek", and "Town of East Sparta - Nimishillen Creek" watersheds as described in the Ohio EPA 2010 draft Integrated Report Watershed Assessment Unit (WAU) Summaries. Within these watersheds, the report identifies the following causes of impairments: ammonia, direct habitat alterations, impairment unknown, nitrates, nutrients, organic enrichment (sewage) biological indicators, other flow regime alterations, oxygen (dissolved), sedimentation/siltation, sulfates, and water temperature. The report identifies the following sources of impairment: agriculture, channelization, industrial point sources, municipal (urbanized high density area), municipal point sources, on-site treatment systems (septic systems and similar decentralized systems), source unknown, spills, subsurface (hardrock) mining, and urban runoff/storm sewers. The listed sources are not directly identified with any particular listed causes of impairments. Therefore, the listed impairments and sources are those that the City's Public Education Program is generally intended to address.

Revisions: 2/1/11

Permit Part III.B.1.b.v.: What is [City of Canton's] outreach strategy, including the mechanisms (e.g., printed brochures, newspapers, media, workshops, etc.) [City of Canton] will use to reach [its] target audiences, and how many people does [City of Canton] expect to reach by [its] outreach strategy over the permit term.

Response: Publications, flyers, the City's website, workshops, storm drain markings, and other mechanisms (as they become available and feasible to utilize) are to be the mechanisms the City of Canton is to use to reach its target audiences. See BMPs below for further details and the particular target audiences intended to be reached.

Revisions: 2/1/11

Permit Part III.B.1.b.vi.: Who (person or department) is responsible for overall management and implementation of [City of Canton's] storm water public education and outreach program and, if different, who is responsible for each of the BMPs identified for this program.

Response: Even though the Assistant City Engineer in the Civil Division of the Engineering Department is the primary contact for the SWMP and responsible for preparing annual reports, the Service Director is responsible for the overall management and implementation of the City of Canton's storm water public education and outreach program. However, each BMP listed below identifies the particular City department or entity and position primarily responsible for the implementation of the respective BMP. Depending on the

nature of the BMP, some may list more than one responsible position. Each responsible position is to maintain all records of supporting information for respective BMP implementation.

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Permit Part III.B.1.b.vii.: How will [City of Canton] evaluate the success of this minimum measure, including how [City of Canton] selected the measurable goals for each of the BMPs.

Response: In time, the City of Canton is to measure the success of this MCM by determining if the measurable goals for the BMPs are met (through annual reports) as well as by implementing the BMPs in accordance with applicable recommendations as identified on USEPA's National Menu of Stormwater Best Management Practices. Each identified responsible position is to provide the respective information for Annual Reports to the Assistant City Engineer in the Civil Division of the City Engineering Department by no later than February 15th, annually. Ideally, the success of the City's SWMP may be evaluated based on the results of field monitoring in the Nimishillen Creek and/or other indicators. Each BMP listed below describes an associated measurable goal or goals. The goals were selected based on some practical and/or quantifiable (if possible) aspect of their implementation and the ease of measuring such aspect which provides simple indication of whether the BMP is successfully implemented.

Revisions: 2/1/11

PERFORMANCE STANDARDS:

Permit Part III.B.1.c.: [City of Canton's] storm water public education and outreach program shall include more than one mechanism and target at least five different storm water themes or messages over the permit term. At a minimum, at least one theme or message shall be targeted to the development community. [City of Canton's] storm water public education and outreach program shall reach at least 50 percent of the population over the permit term.

ANNUAL REPORTING:

Permit Part III.B.1.d.: Annual Reports shall identify each public education mechanism used, including each storm water theme, audience targeting, and an estimate of how many people were reached by each mechanism.

Table 1

Minimum Control Measure (MCM)#1: Public Education and Outreach on Storm Water Impacts

MCM#1 DEPARTMENTAL INVOLVEMENT

Summary of Departments/Responsible Positions with Considerable Involvement in MCM#1 and Associated Best Management Practices (BMPs)

Overall Authority	Department	Division	Responsible Position ¹	BMP #s ²	Total BMPs in MCM#1
Mayor	Mayor's Administration		Mayor	Not applicable	0
Mayor	Mayor's Administration		Management Assistant	Not applicable	0
Mayor	Mayor's Administration		Service Director	Not applicable	0
Service Director	Building Maintenance		Supervisor	3	1
Service Director	Civic Center		Manager	3	1
Service Director	Collection Systems		Superintendent	3	1
Service Director	Development		Director	Not applicable	0
Service Director	Division of Motor Vehicles		Superintendent	3	1
Service Director	Sanitation		Superintendent	2, 3	2
Service Director	Street		Superintendent	3	1
Service Director	Water		Superintendent	3	1
Service Director	Water Reclamation Facility		Superintendent	3	1
Service Director	Engineering		City Engineer	3	1
City Engineer	Engineering	Civil	Assistant City Engineer	4, 5	2
City Engineer	Engineering	Traffic	Assistant City Engineer	Not applicable	0
Mayor	Mayor's Administration		Safety Director	Not applicable	0
Safety Director	Building	Zoning	Zoning Inspector	Not applicable	0
Safety Director	Fire		Chief	3	1
Safety Director	Police	Impound	Lieutenant	3	1
Board of Health	Health	Environmental Health	Environmental Health Director	3	1
Judges	Judges	Community Service	Community Service Director	Not applicable	0
Park Commission	Park		Director	3	1
Joint Recreation District	Recreation		Director	3	1
Stark County	SWCD		Urban Resource Coordinator	1	1

Footnotes:

1 – See Table B for Responsible Position contact information

2 – Refer to identified BMPs within this Minimum Control Measure section of the Storm Water Management Program for details

Revisions: 2/22/11

**Minimum Control Measure (MCM) #1: Public Education and Outreach on Storm Water Impacts
 “Storm Water Public Education and Outreach Program”: Best Management Practices
 (BMPs)/Public Education Mechanisms used to Satisfy MCM Requirements**

1. **BMP#:** 1
2. **Permit Requirement:** Storm water education for development community
3. **BMP Name (Permit Part III.A.1.a.):** Storm water education for development community
4. **BMP Type and Theme or Message (Permit Part III.B.1.b.v.):** Workshops addressing project designs that minimize water quality impacts
5. **BMP Description (Permit Part III.A.1.a.):** Through a Memorandum of Understanding between the City of Canton and the Stark SWCD, the Stark SWCD provides annual training opportunities for the development community. Workshops are offered that focus on construction site and post-construction storm water quality controls.
6. **Rationale for BMP Selection (Permit Part III.A.1.e.):** Education programs for developers and the public about project designs that minimize water quality impacts are considered non-structural post-construction BMPs per MCM#5 (Part III.B.5.e.iii.). All permit training/education requirements are to be coordinated, if possible, to avoid duplication of efforts.
7. **Target Audience Description (Permit Part III.B.1.b.iii.):** Development community
8. **Target Audience Estimated as % of Overall Population (Permit Part III.B.1.b.v.):** <1%
9. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
10. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Stark SWCD/Urban Resource Coordinator
11. **Agreement Needed for Implementation (Permit Part III.C.)?** Yes
12. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):**
 - a. Renew MOU between City and Stark SWCD annually
 - b. Once per year, Stark SWCD is to offer at least 1 respective workshop to local developers, contractors, and engineers
13. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
14. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.1.d.):**
 - a. Indication of annual MOU renewal
 - b. Workshop name, date, number of attendees, attendee representation, training location, topics covered
15. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):**
 - a. Copy of MOU and payment verification
 - b. Workshop flyer/agenda, attendance list, handouts, etc.
16. **For Further BMP Guidance:** Refer to all USEPA BMPs under MCM#5: Post-Construction Storm Water Management in New Development and Redevelopment on USEPA’s National Menu of Stormwater BMPs Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

Revisions: 2/1/11

**Minimum Control Measure (MCM) #1: Public Education and Outreach on Storm Water Impacts
 “Storm Water Public Education and Outreach Program”: Best Management Practices
 (BMPs)/Public Education Mechanisms used to Satisfy MCM Requirements**

1. **BMP#:** 2
2. **Permit Requirement:** Illicit discharge and trash management education
3. **BMP Name (Permit Part III.A.1.a.):** Illicit discharge and trash management education
4. **BMP Type and Theme or Message (Permit Part III.B.1.b.v.):**
 - a. Flyers addressing hazards associated with illegal discharges and improper disposal of waste
 - b. Email addressing hazards associated with illegal discharges and improper disposal of waste
 - c. Article addressing hazards associated with illegal discharges and improper disposal of waste
5. **BMP Description (Permit Part III.A.1.a.):** The City's Sanitation Department is involved with trash disposal and waste management. The Sanitation Department distributes trash management educational flyers to all new sanitation customers and upon request. The flyers are also made available at various City departments. Also, the Sanitation department is to provide illegal discharge and trash management education to public employees via email and to the general public via articles in the City's quarterly publication.
6. **Rationale for BMP Selection (Permit Part III.A.1.e.):** Such education is required for MCM#3 (Part III.B.3.f.). All permit training/education requirements are to be coordinated, if possible, to avoid duplication of efforts.
7. **Target Audience Description (Permit Part III.B.1.b.iii.):**
 - a. Sanitation customers
 - b. City employees
 - c. General public
8. **Target Audience Estimated as % of Overall Population (Permit Part III.B.1.b.v.):**
 - a. Sanitation customers: 90%
 - b. City employees: <1%
 - c. General public: 100%
9. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
10. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Sanitation Department/Superintendent
11. **Agreement Needed for Implementation (Permit Part III.C.)?** No
12. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):**
 - a. Distribute flyer to all new sanitation customers and upon request
 - b. Once per year, send email to City Department heads to post and share with employees
 - c. Once per year, provide educational article in City's quarterly publication
13. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
14. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.1.d.):**
 - a. Estimate of number of flyers distributed and brief description of content
 - b. Date email was sent and brief description of content
 - c. Date article was provided and brief description of content
15. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):**
 - a. Copy of flyer; records verifying new sanitation customers
 - b. Copy of email
 - c. Copy of article
16. **For Further BMP Guidance:** Refer to "Trash and Debris Management" (under USEPA MCM#1: Public Education and Outreach on Storm Water Impacts) on USEPA's National Menu of Stormwater BMPs Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

**Minimum Control Measure (MCM) #1: Public Education and Outreach on Storm Water Impacts
 “Storm Water Public Education and Outreach Program”: Best Management Practices
 (BMPs)/Public Education Mechanisms used to Satisfy MCM Requirements**

1. **BMP#:** 3
2. **Permit Requirement:** Government employee training/education to prevent and reduce storm water pollution from municipal operations
3. **BMP Name (Permit Part III.A.1.a.):** Government employee training/education
4. **BMP Type and Theme or Message (Permit Part III.B.1.b.v.):** Workshops, literature, etc. addressing prevention and reduction of storm water pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and storm water maintenance
5. **BMP Description (Permit Part III.A.1.a.):** Municipal employee training is necessary to teach staff about potential sources of stormwater contamination and ways to minimize the water quality impact of municipal activities. The City previously purchased a "Municipal Storm Water Pollution Prevention - Storm Watch - Everyday BMPs" training kit which includes a DVD and a kit test for employees which is to be used to assist in implementing this BMP. Specific topics include, but are not limited to: good housekeeping and spill prevention, vehicle and equipment washing and maintenance, spill response and reporting, street and lot maintenance, proper storage of materials, landscaping and lawn care, etc. Also, there are various training/education opportunities provided throughout the year via conferences, training sessions, seminars, etc. by outside resources in which employees attend.
6. **Rationale for BMP Selection (Permit Part III.A.1.e.):** Such education/training is required per MCM#3 (Part III.B.3.f) and MCM#6 (Parts III.B.6.a. and b. and Part III.B.6.e.). All permit training requirements are to be coordinated, if possible, to avoid duplication of efforts.
7. **Target Audience Description (Permit Part III.B.1.b.iii.):** Employees of the following City entities:
 - Street Department
 - Civic Center
 - Engineering Department
 - Collection Systems (Sewer) Department
 - Sanitation Department
 - Division of Motor Vehicles
 - Building Maintenance Department
 - Police (Impound) Department
 - Water Department
 - Parks Department
 - Recreation Department
 - Health Department
 - Fire Department
 - Water Reclamation Facility
8. **Target Audience Estimated as % of Overall Population (Permit Part III.B.1.b.v.):** <1%
9. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
10. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):**
 - Street Department/Superintendent
 - Civic Center/Manager
 - Engineering Department/City Engineer
 - Collection Systems (Sewer) Department/Superintendent
 - Sanitation Department/Superintendent
 - Division of Motor Vehicles/Superintendent
 - Building Maintenance Department/Superintendent
 - Police (Impound) Department/Lieutenant

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- Water Department/Superintendent
- Parks Department/Director
- Recreation Department/Director
- Health Department/Environmental Health Director
- Fire Department/Chief
- Water Reclamation Facility/Superintendent

11. Agreement Needed for Implementation (Permit Part III.C.)? No

12. Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):

- a. Utilize "Storm Watch" training kit (available at City Engineering Dept) annually to train appropriate employees
- b. As feasible, utilize other relevant training/education resources available to train appropriate employees

13. Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.): Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations

14. Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.1.d.):

- a. Indication if "Storm Watch" training kit was utilized to train appropriate employees; respective training dates; number of employees trained
- b. Indication if other relevant training/education resources were used to train appropriate employees; respective training dates; number of employees trained

15. Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.): Supporting training documentation specifying date; attendance list; respective training flyer/agenda; description of training resources used, as applicable

16. For Further BMP Guidance: Refer to "Municipal Employee Training and Education" (under USEPA MCM#6: Pollution Prevention/ Good Housekeeping for Municipal Operations) on USEPA's National Menu of Stormwater BMPs Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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**Minimum Control Measure (MCM) #1: Public Education and Outreach on Storm Water Impacts
“Storm Water Public Education and Outreach Program”: Best Management Practices
(BMPs)/Public Education Mechanisms used to Satisfy MCM Requirements**

1. **BMP#:** 4
2. **Permit Requirement:** Public education on storm water impacts
3. **BMP Name (Permit Part III.A.1.a.):** Quarterly publication
4. **BMP Type and Theme or Message (Permit Part III.B.1.b.v.):** City quarterly publication used to address various storm water topics
5. **BMP Description (Permit Part III.A.1.a.):** The Assistant City Engineer provides storm water news and education through the "Runoff Rundown" section of the quarterly publication. Sometimes educational materials made available by EPA are utilized within the publication.
6. **Rationale for BMP Selection (Permit Part III.A.1.e.):** The City utilizes an existing quarterly publication to reach out to the general public of the City of Canton on various aspects of City government and activities. The publication is sent to all residences and businesses in the City of Canton, and is therefore an excellent way to reach the entire City of Canton population.
7. **Target Audience Description (Permit Part III.B.1.b.iii.):** General public
8. **Target Audience Estimated as % of Overall Population (Permit Part III.B.1.b.v.):** 100%
9. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
10. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Engineering Department (Civil Division)/Assistant City Engineer
11. **Agreement Needed for Implementation (Permit Part III.C.)?** No
12. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):** Provide one storm water education article/resource in each of four yearly publications
13. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
14. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.1.d.):** Brief descriptions of articles/resources and publication dates; estimate of how many people received publication
15. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):** Copy of articles/resources; estimate of number of recipients
16. **For Further BMP Guidance:** Refer to "Developing an Outreach Strategy" & "Educational Displays, Pamphlets, Booklets, and Bill Inserts" (under USEPA MCM#1: Public Education and Outreach on Storm Water Impacts) on USEPA's National Menu of Stormwater BMPs Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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**Minimum Control Measure (MCM) #1: Public Education and Outreach on Storm Water Impacts
“Storm Water Public Education and Outreach Program”: Best Management Practices
(BMPs)/Public Education Mechanisms used to Satisfy MCM Requirements**

1. **BMP#:** 5
2. **Permit Requirement:** Public education on storm water impacts
3. **BMP Name (Permit Part III.A.1.a.):** City website
4. **BMP Type and Theme or Message (Permit Part III.B.1.b.v.):** City website addressing various storm water topics
5. **BMP Description (Permit Part III.A.1.a.):** The Engineering Department has the ability to add information to the website as needed, and therefore is to ensure that storm water educational materials and/or links are provided.
6. **Rationale for BMP Selection (Permit Part III.A.1.e.):** The City has an existing website that is a low-cost and excellent resource for education to website visitors and can easily be modified to include new information.
7. **Target Audience Description (Permit Part III.B.1.b.iii.):** General public
8. **Target Audience Estimated as % of Overall Population (Permit Part III.B.1.b.v.):** ?%
9. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
10. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Engineering Department (Civil Division)/Assistant City Engineer
11. **Agreement Needed for Implementation (Permit Part III.C.)?** No
12. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):** Continually provide storm water education materials/links on City website
13. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
14. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.1.d.):** Brief descriptions of types of storm water education resources/links provided on website; relevant updates, etc.
15. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):** (Maintain website accordingly)
16. **For Further BMP Guidance:** Refer to "Developing an Outreach Strategy" (under USEPA MCM#1: Public Education and Outreach on Storm Water Impacts) on USEPA's National Menu of Stormwater BMPs Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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2 **Minimum Control Measure (MCM) #2: Public Involvement/Participation**

“Storm Water Public Education and Outreach Program”: Overview

MCM PERMIT REQUIREMENTS:

Permit Part III.B.2.a.: [City of Canton] shall comply with State and local public notice requirements and satisfy this minimum control measure's minimum performance standards when implementing a public involvement/participation program.

DECISION PROCESS (RATIONALE STATEMENT) FOR DEVELOPMENT OF STORM WATER PUBLIC EDUCATION AND OUTREACH PROGRAM:

Permit Part III.B.2.b.: [City of Canton] shall document [its] decision process for the development of a storm water public involvement/participation program. [City of Canton's] rationale statement shall address both [its] overall public involvement/participation program and the individual BMPs, measurable goals, and responsible persons for [City of Canton's] program.

Response: The City of Canton supports EPA's assessment that the City should involve the public in developing, implementing, updating, and reviewing its SWMP. The Storm Water Public Involvement/Participation Program should make efforts to reach out and engage various economic and ethnic groups. The public can provide valuable input and assistance to the City's SWMP and, therefore, that the public be given opportunities to play an active role on both the development and implementation of the SWMP. An active and involved community is crucial to the success of a SWMP because it allows for: (1) "Broader public support" since citizens who participate in the development and decision-making process are partially responsible for the program and, therefore, may be less likely to raise legal challenges to the program and more likely to take an active role in its implementation; (2) "Shorter implementation schedules" due to fewer obstacles in the form of public and legal challenges and increased sources in the form of citizen volunteers; (3) "A broader base of expertise and economic benefits" since the community can be a valuable, and free, intellectual resource; and (4) "A conduit to other programs" as citizens involved in the SWMP development process provide important cross-connections and relationships with other community and government programs.

See USEPA's Stormwater Phase II Final Rule Fact Sheet Series at <http://cfpub.epa.gov/npdes/stormwater/swfinal.cfm> for further information on the NPDES Phase II Small MS4 Storm Water Program and the associated Minimum Control Measures. The City of Canton is to implement the BMPs described below as part of its Storm Water Public Involvement/Participation Program. The identified BMPs are those that the City believes are needed to meet permit requirements and/or expectations. See "Public Involvement/Participation" on USEPA's National Menu of Stormwater Best Management Practices at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/> for further BMP guidance and information.

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Permit Part III.B.2.b.: The rationale statement shall include the following information, at a minimum:

Permit Part III.B.2.b.i.: Has [City of Canton] involved the public in the development and submittal of [its] NOI and SWMP description?

Response: Throughout the planning stages of preparing for NPDES Phase II under the initial 2003 permit, the City of Canton had meetings with the Stark County Regional Planning Commission (RPC) to specifically

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discuss the NPDES Phase II program requirements and plan preparation strategy. These were mostly informative meetings for the City of Canton. Stark RPC held public meetings in which NPDES Phase II updates were provided and public input was welcomed. Also, NPDES Phase II plan preparation strategy and partnership with Stark RPC was discussed at City Council meetings in which public input was welcomed. However, no public input was received and therefore the general public was not a factor in the development and submittal of the City's Notice Of Intent (NOI) and SWMP.

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Permit Part III.B.2.b.ii.: What is [City of Canton's] plan to actively involve the public in the development and implementation of [its] program?

Response: Since 2003, aspects of NPDES Phase II and the City's SWMP have been subjects at various levels of public access, such as: through the City's website, publications, announcements, public meetings, and other means of communication. In addition to these mechanisms, the general public also has the ability to obtain information, report concerns, and provide comments on various issues to the City in person, by phone, mail, or email. Public involvement in the development of the City's SWMP has unfortunately been non-existent which is perceived to be due to lack of interest. Public implementation of the SWMP can be determined by the success of meeting the various measurable goals for applicable BMPs, as reported in annual reports since 2003.

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Permit Part III.B.2.b.iii.: Who are the target audiences for [City of Canton's] public involvement program, including a description of the types of ethnic and economic groups engaged? [City of Canton] is encouraged to actively involve all potentially affected stakeholder groups, including commercial and industrial businesses, trade associations, environmental groups, homeowners associations, and educational organizations, among others.

Response: The general public, which is made up of various types of ethnic and economic groups, is the overall target audience for the City of Canton's Storm Water Public Involvement/Participation Program. However, each BMP listed below lists the specific target audience it is intended to reach.

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Permit Part III.B.2.b.iv.: What are the types of public involvement activities included in [City of Canton's] program? Where appropriate, consider the following types of public involvement activities: citizen representatives on a storm water management panel, public hearings, working with citizen volunteers willing to educate others about the program, volunteer monitoring or stream/beach clean-up activities.

Response: Public involvement activities are generally in the form of street, neighborhood, and park cleanups. See BMPs below for further information. The general public can also participate in various activities organized through a volunteer watershed group within the Nimishillen Creek watershed.

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Permit Part III.B.2.b.v.: Who (person or department) is responsible for the overall management and implementation of [City of Canton's] storm water public involvement/participation program and, if different, who is responsible for each of the BMPs identified for this program?

Response: Even though the Assistant City Engineer in the Civil Division of the Engineering Department is the primary contact for the SWMP and responsible for preparing annual reports, the Service Director is responsible for the overall management and implementation of the City of Canton's storm water public involvement/participation program. However, each BMP listed below identifies the particular City department or entity and position primarily responsible for the implementation of the respective BMP. Depending on the nature of the BMP, some may list more than one responsible position. Each responsible position is to maintain all records of supporting information for respective BMP implementation.

Permit Part III.B.2.b.vi.: How [City of Canton] will evaluate the success of this minimum measure, including how [City of Canton] selected the measurable goals for each of the BMPs.

Response: In time, the City of Canton is to measure the success of this MCM by determining if the measurable goals for the BMPs are met (through annual reports) as well as by implementing the BMPs in accordance with applicable recommendations as identified on USEPA's National Menu of Stormwater Best Management Practices. Each identified responsible position is to provide the respective information for Annual Reports to the Assistant City Engineer in the Civil Division of the City Engineering Department by no later than February 15th, annually. Ideally, the success of the City's SWMP may be evaluated based on the results of field monitoring in the Nimishillen Creek and/or other indicators. Each BMP listed below describes an associated measurable goal or goals. The goals were selected based on some practical and/or quantifiable (if possible) aspect of their implementation and the ease of measuring such aspect which provides simple indication of whether the BMP is successfully implemented.

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PERFORMANCE STANDARDS:

Permit Part III.B.2.c.: [City of Canton's] storm water public involvement/participation program shall include, at a minimum, five public involvement activities over the permit term.

ANNUAL REPORTING:

Permit Part III.B.2.d.: Annual Reports shall identify each public involvement/participation activity conducted, including a brief description of activity and shall include an estimate of how many people participated.

Table 2

Minimum Control Measure (MCM)#2: Public Involvement/Participation

MCM#2 DEPARTMENTAL INVOLVEMENT

Summary of Departments/Responsible Positions with Considerable Involvement in MCM#2 and Associated Best Management Practices (BMPs)

Overall Authority	Department	Division	Responsible Position ¹	BMP #s ²	Total BMPs in MCM#2
Mayor	Mayor's Administration		Mayor	Not applicable	0
Mayor	Mayor's Administration		Management Assistant	5	1
Mayor	Mayor's Administration		Service Director	Not applicable	0
Service Director	Building Maintenance		Supervisor	Not applicable	0
Service Director	Civic Center		Manager	Not applicable	0
Service Director	Collection Systems		Superintendent	Not applicable	0
Service Director	Development		Director	2	1
Service Director	Division of Motor Vehicles		Superintendent	Not applicable	0
Service Director	Sanitation		Superintendent	Not applicable	0
Service Director	Street		Superintendent	1	1
Service Director	Water		Superintendent	Not applicable	0
Service Director	Water Reclamation Facility		Superintendent	Not applicable	0
Service Director	Engineering		City Engineer	Not applicable	0
City Engineer	Engineering	Civil	Assistant City Engineer	Not applicable	0
City Engineer	Engineering	Traffic	Assistant City Engineer	Not applicable	0
Mayor	Mayor's Administration		Safety Director	Not applicable	0
Safety Director	Building	Zoning	Zoning Inspector	Not applicable	0
Safety Director	Fire		Chief	Not applicable	0
Safety Director	Police	Impound	Lieutenant	Not applicable	0
Board of Health	Health	Environmental Health	Environmental Health Director	Not applicable	0
Judges	Judges	Community Service	Community Service Director	3	1
Park Commission	Park		Director	4	1
Joint Recreation District	Recreation		Director	Not applicable	0
Stark County	SWCD		Urban Resource Coordinator	Not applicable	0

Footnotes:

1 – See Table B for Responsible Position contact information

2 – Refer to identified BMPs within this Minimum Control Measure section of the Storm Water Management Program for details

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Minimum Control Measure (MCM) #2: Public Involvement/Participation

“Storm Water Public Involvement/Participation Program”: Best Management Practices (BMPs)/Public Involvement Activities used to Satisfy MCM Requirements

1. **BMP#:** 1
2. **Permit Requirement:** Public involvement/participation in storm water activity
3. **BMP Name (Permit Part III.A.1.a.):** Beautify A Neighborhood (BAN) Program
4. **BMP Type and Theme or Message (Permit Part III.B.2.b.iv.):** Neighborhood associations partnering with City Street Department to conduct neighborhood cleanups
5. **BMP Description (Permit Part III.A.1.a.):** In 2006, the City of Canton Street Department introduced the BAN Program with the objective of fostering neighborhood beautification through a dedication of public resources to those neighborhood groups willing to assist the City in the process. Street Department employees assist residents with neighborhood cleanup projects. The BAN Program establishes scheduled dates for the City and neighborhood groups to partner up for neighborhood cleanups, one neighborhood at a time. None days are scheduled between April 1st and October 31st of each year. Any individual or organization within the City can apply for one of the available dates.
6. **Rationale for BMP Selection (Permit Part III.A.1.e.):** Cleanups prevent litter and trash from washing into the City's MS4 and polluting local water bodies.
7. **Target Audience Description (Permit Part III.B.2.b.iii.):** City Neighborhood Associations
8. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
9. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Street Department/Superintendent
10. **Agreement Needed for Implementation (Permit Part III.C.)?** No
11. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):** Utilize all 9 days set aside per year for neighborhood cleanups
12. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
13. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.2.d.):** Brief descriptions of BAN activities (including dates, locations, etc., if possible); estimate of number of participants
14. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):** Supporting documentation such as copies of activity advertisement, sign-up/ attendance sheets, etc.
15. **For Further BMP Guidance:** Refer to all Public Involvement/ Participation BMPs on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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Minimum Control Measure (MCM) #2: Public Involvement/Participation

“Storm Water Public Involvement/Participation Program”: Best Management Practices (BMPs)/Public Involvement Activities used to Satisfy MCM Requirements

1. **BMP#:** 2
2. **Permit Requirement:** Public involvement/participation in storm water activity
3. **BMP Name (Permit Part III.A.1.a.):** Stark Community Foundation’s Neighborhood Partnership Grant Program (NPGP)
4. **BMP Type and Theme or Message (Permit Part III.B.2.b.iv.):** Grant program for neighborhood associations to conduct community cleanups
5. **BMP Description (Permit Part III.A.1.a.):** The City of Canton's Development Department and some private partners have a joint funding partnership with Stark Community Foundation (SCF) in which funds are provided from the City via the Neighborhood Partnership Grant Program (NPGP) to neighborhood associations to help conduct various activities including community cleanups. Most participating neighborhood associations conduct two cleanups per year. See www.starkcf.org/neighborhood_partnership.asp for more details.
6. **Rationale for BMP Selection (Permit Part III.A.1.e.):** Cleanups prevent litter and trash from washing into the City's MS4 and polluting local water bodies.
7. **Target Audience Description (Permit Part III.B.2.b.iii.):** City Neighborhood Associations and residents
8. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes, via partnership
9. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Development Department/Director
10. **Agreement Needed for Implementation (Permit Part III.C.)?** Yes
11. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):**
 - a. Continue to partner with Stark Community Foundation to provide the NPGP
 - b. Conduct community cleanups every year
12. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
13. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.2.d.):**
 - a. Indication of continued partnership with Stark Community Foundation
 - b. Number of community cleanups conducted; brief description (dates, locations); estimate of number of participants
14. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):**
 - a. Copy of partnership agreement
 - b. Supporting documentation (copy of activity advertisement, sign-up sheets, etc.)
15. **For Further BMP Guidance:** Refer to all Public Involvement/ Participation BMPs on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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Minimum Control Measure (MCM) #2: Public Involvement/Participation

“Storm Water Public Involvement/Participation Program”: Best Management Practices (BMPs)/Public Involvement Activities used to Satisfy MCM Requirements

1. **BMP#:** 3
2. **Permit Requirement:** Public involvement/participation in storm water activity
3. **BMP Name (Permit Part III.A.1.a.):** Canton Municipal Court’s Community Service Road Crew Cleanups
4. **BMP Type and Theme or Message (Permit Part III.B.2.b.iv.):** General public sentenced to community service performing cleanups
5. **BMP Description (Permit Part III.A.1.a.):** When the Canton Municipal Court sentences people to perform community service, some of the people are assigned to the Road Crew. The Canton Municipal Court's Road Crew picks up litter and trash from the streets of Canton as well as cleaning up nuisance properties for the City of Canton's Code Enforcement and Health Department. Certain areas are targeted based on complaints received.
6. **Rationale for BMP Selection (Permit Part III.A.1.e.):** Cleanups prevent litter and trash from washing into the City's MS4 and polluting local water bodies.
7. **Target Audience Description (Permit Part III.B.2.b.iii.):** Community service workers
8. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
9. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Judges/Community Service Director
10. **Agreement Needed for Implementation (Permit Part III.C.)?** No
11. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):** Continue to utilize Road Crew Cleanups as a means of required community service for the general public
12. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
13. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.2.d.):** Brief description of activity (including date(s), location(s), etc., if possible); estimate of # of participants
14. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):** Supporting documentation such as copy of Road Crew policies, lists of participants, etc.
15. **For Further BMP Guidance:** Refer to all Public Involvement/ Participation BMPs on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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Minimum Control Measure (MCM) #2: Public Involvement/Participation

“Storm Water Public Involvement/Participation Program”: Best Management Practices (BMPs)/Public Involvement Activities used to Satisfy MCM Requirements

1. **BMP#:** 4
2. **Permit Requirement:** Public involvement/participation in storm water activity
3. **BMP Name (Permit Part III.A.1.a.):** Canton Parks Cleanups
4. **BMP Type and Theme or Message (Permit Part III.B.2.b.iv.):** Cleanup and beautification activities within Canton Parks
5. **BMP Description (Permit Part III.A.1.a.):** Various cleanup and beautification activities take place within Canton Parks throughout the year. Many of these parks have streams, ponds, lakes, or wetlands located within them.
6. **Rationale for BMP Selection (Permit Part III.A.1.e.):** Cleanups prevent litter and trash from washing into the City's MS4 and polluting local water bodies.
7. **Target Audience Description (Permit Part III.B.2.b.iii.):** General public
8. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
9. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Parks Department/Director
10. **Agreement Needed for Implementation (Permit Part III.C.)?** No
11. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):** Conduct one Canton Park cleanup per year
12. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
13. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.2.d.):** Brief description of activity (including date(s), location(s), etc., if possible); estimate of # of participants
14. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):** Supporting documentation (copy of activity advertisement, sign-up sheets, etc.)
15. **For Further BMP Guidance:** Refer to all Public Involvement/ Participation BMPs on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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Minimum Control Measure (MCM) #2: Public Involvement/Participation

“Storm Water Public Involvement/Participation Program”: Best Management Practices (BMPs)/Public Involvement Activities used to Satisfy MCM Requirements

1. **BMP#:** 5
2. **Permit Requirement:** Public involvement/participation in storm water activity
3. **BMP Name (Permit Part III.A.1.a.):** Keep Canton Clean Program
4. **BMP Type and Theme or Message (Permit Part III.B.2.b.iv.):** Neighborhood cleanups and pollution education
5. **BMP Description (Permit Part III.A.1.a.):** Mayor William Healy, Canton City Schools, local McDonald's franchisees, and Wal-Mart team up with residents to improve the appearance of city streets by cleaning up unsightly litter and other garbage at designated locations. Volunteers are provided with cleanup materials and also receive a free lunch donated by McDonald's. The cleanup is done in conjunction with Canton City Schools' Keep Canton Clean Education Series which informs students about the short and long-term ramifications of littering and pollution, as well as some of the serious challenges city employees face with regard to litter, pollution, and illegal dumping.
6. **Rationale for BMP Selection (Permit Part III.A.1.e.):** Cleanups prevent litter and trash from washing into the City's MS4 and polluting local water bodies.
7. **Target Audience Description (Permit Part III.B.2.b.iii.):** General public and students
8. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
9. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Mayor/Management Assistant
10. **Agreement Needed for Implementation (Permit Part III.C.)?** No
11. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):** Conduct one neighborhood cleanup in 2009
12. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
13. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.2.d.):** Brief description of activity (including date(s), location(s), etc., if possible); estimate of # of participants
14. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):** Supporting documentation (copy of activity advertisement, sign-up sheets, etc.)
15. **For Further BMP Guidance:** Refer to all Public Involvement/ Participation BMPs on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

Revisions: 2/1/11

3 Minimum Control Measure (MCM) #3: Illicit Discharge Detection and Elimination

“Storm Water Illicit Discharge Detection and Elimination (IDDE) Program”: Overview

MCM PERMIT REQUIREMENTS:

Permit Part III.B.3.a.: [City of Canton] shall develop, implement, and enforce a program to detect and eliminate illicit discharges, as defined in Part IV of the permit, into its MS4 (for illicit discharges to the MS4 via an adjacent, outside-of-jurisdiction-interconnected-MS4, [City of Canton] is only required to inform the neighboring MS4 and Ohio EPA in its Annual Report submission, of their existence).

Permit Part III.B.3.b.: [City of Canton] shall develop, if not already completed, a comprehensive storm sewer system map, showing the location of all outfalls and the names and location of all surface waters of the State that receive discharges from those outfalls. Within five years of when [City of Canton's] coverage under this general permit was granted [6/4/2009], [City of Canton's] comprehensive storm sewer system map shall also include [City of Canton's] MS4 (owned or operated by [City of Canton]), including catch basins, pipes, ditches, flood control facilities (retention/detention ponds), post-construction water quality BMPs and private post-construction water quality BMPs which have been installed to satisfy Ohio EPA's NPDES Construction Storm Water general permit and/or [City of Canton's] local post-construction water quality BMP requirements. If [City of Canton] will be unable to develop [its] comprehensive storm sewer system map during this permit term, [City of Canton] shall provide an alternative schedule to complete with [its] 2009 Annual Report.

Permit Part III.B.3.c.i.: Within five years of when [City of Canton's] initial Small MS4 general permit coverage was granted (04/03/2003), [City of Canton] shall submit the following to Ohio EPA:

Permit Part III.B.3.c.i.: A list of all on-site sewage disposal systems connected to discharge to [City of Canton's] MS4 (a.k.a. home sewage treatment systems (HSTSS)) including addresses; and

Permit Part III.B.3.c.ii.: A storm sewer map showing the location of all HSTSSs connected to [City of Canton's] MS4. This map shall include details on the type and size of conduits/ditches in [City of Canton's] MS4 that receive discharges from HSTSSs, as well as the water bodies receiving the discharges from [City of Canton's] MS4.

Permit Part III.B.3.d.: [City of Canton] shall, to the extent allowable under State or local law, effectively prohibit, through ordinance or other regulatory mechanism, illicit discharges into [City of Canton's] storm sewer system and implement appropriate enforcement procedures and actions.

Permit Part III.B.3.e.: [City of Canton] shall develop and implement a plan to detect and eliminate non-storm water discharges, including illegal dumping, to [City of Canton's] system. At a minimum, for household sewage treatment systems (HSTSSs), [City of Canton's] plan shall address or include provisions for:

Permit Part III.B.3.e.i.: Working with the appropriate Board(s) of Commissioners, other public officials, local waste water authorities, any other appropriate entity and local board(s) of health, to proactively identify residences with existing individual discharging HSTSSs that can be legally, feasibly, and economically connected to central sewers. At a minimum, the plan shall evaluate applying provisions identified by ORC 6117.51 and other applicable State and local laws and/or regulations. At a minimum, this activity should require connection to central sewers for any discharging HSTSS that is not operating

as designed and intended if feasible, but it does not preclude connection to central sewers of any HSTS if local planning and coordination recommends such;

Permit Part III.B.3.e.ii.: Working with local board(s) of health to develop a proactive operation and maintenance program or implement/enhance an existing operation and maintenance program which determines if existing discharging HSTSs are operating as designed and intended and, for those not meeting this criteria, requires elimination, upgrade, or replacement of the systems as appropriate. For HSTS discharges that cannot be eliminated through connection to central sewers or installation of soil absorption systems, the property owner must be notified of the requirement to pursue coverage under an appropriate Ohio EPA general NPDES permit;

Permit Part III.B.3.e.iii.: Actively investigating the source(s) of contamination in outfalls during dry weather screening process. When the contamination source has been identified as discharging HSTS that is not operating as designed and intended, work with the local board(s) of health to determine proper course of action in resolving the non-functioning HSTS with connection to central sewers being preferred alternative, followed by replacing systems with a soil absorption system that does not discharge and only allowing a replacement discharging HSTS when no other option is available. For HSTS discharges that cannot be eliminated through connection to central sewers or installation of soil absorption systems, the property owner must be notified of the requirement to pursue coverage under an appropriate Ohio EPA general NPDES permit; and

Permit Part III.B.3.e.iv.: Working with local waste water authorities, planning agencies or other appropriate agencies involved to evaluate the planned or possible future installation of sewers for areas which contain high densities of discharging HSTSs.

Permit Part III.B.3.f.: [City of Canton] shall inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste; and

Part III.B.3.g.: [City of Canton] shall address the following categories of non-storm water discharges or flows (i.e. illicit discharges) only if [City of Canton] identifies them as significant contributors of pollutants to [City of Canton's] small MS4: water line flushing, landscape irrigation, diverted stream flows, rising ground waters, uncontaminated ground water infiltration (as defined at 40 CFR 35.2005(20)), uncontaminated pumped ground water, discharges from potable water sources, foundation drains, air conditioning condensation, irrigation water, springs, water from crawl space pumps, footing drains, lawn watering, individual residential car washing, flows from riparian habitats and wetlands, dechlorinated swimming pool discharges, street wash water, and discharges from fire fighting activities (by definition, not an illicit discharge).

Permit Part III.B.3.h.: [City of Canton] may also develop a list of other similar occasional incidental non-storm water discharges (e.g. non-commercial or charity car washes, etc.) that will not be addresses as illicit discharges. These non-storm water discharges must not be reasonably expected (based on information available to the permittees) to be significant sources of pollutants to the MS4, because of either the nature of the discharges or conditions [City of Canton] has established for allowing these discharges to [City of Canton's] MS4 (e.g. a charity car wash with appropriate controls on frequency, proximity to sensitive water bodies, BMPs on the wash water, etc.). [City of Canton] must document in [City of Canton's] SWMP any local controls or conditions placed on the discharges. [City of Canton] must include a provision prohibiting any individual non-storm water discharge that is determined to be contributing significant amounts of pollutants to [City of Canton's] MS4.

DECISION PROCESS (RATIONALE STATEMENT) FOR DEVELOPMENT OF STORM WATER ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDDE) PROGRAM:

Permit Part III.B.3.i.: [City of Canton] shall document [its] decision process for the development of a storm water illicit discharge detection and elimination program. [City of Canton's] rationale statement shall address both [its] overall illicit discharge detection and elimination program and the individual BMPs, measurable goals, and responsible persons for [its] program.

Response: The City of Canton supports EPA's assessment that the implementation of an effective IDDE Program allows the City to gain a thorough awareness of its MS4 which allows the City to determine the types and sources of illicit discharges entering the MS4 and establish the legal, technical, and educational means needed to eliminate these discharges. See USEPA's Stormwater Phase II Final Rule Fact Sheet Series at <http://cfpub.epa.gov/npdes/stormwater/swfinal.cfm> for further information on the NPDES Phase II Small MS4 Storm Water Program and the associated Minimum Control Measures.

The City of Canton is to implement the BMPs described below as part of its IDDE Program. The identified BMPs are those that the City believes are needed to meet permit requirements and/or expectations. See "Illicit Discharge Detection and Elimination" on USEPA's National Menu of Stormwater Best Management Practices at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/> for further BMP guidance and information.

Revisions: 2/1/11

Permit Part III.B.3.i.: The rationale statement shall include the following information, at a minimum:

Permit Part III.B.3.i.i.: How [City of Canton] will develop a comprehensive storm sewer map showing the location of all outfalls and the names and location of all receiving waters. Describe the sources of information [City of Canton] used for the maps, and how [City of Canton] plans to verify the outfall locations with field surveys. If already completed, describe how [City of Canton] developed this map. Also, describe how [City of Canton's] map will be regularly updated.

Response: The City of Canton previously developed a "storm sewer system map, showing locations of all outfalls and the names and locations of all surface waters of the State that receive discharges from those outfalls" as required under the initial 2003 NPDES Small MS4 Permit. Additional information as required by the 2009 permit is to be added to that map accordingly to meet permit requirements. See "MS4 map" BMP below for further details.

Revisions: 2/1/11

Permit Part III.B.3.i.ii.: The mechanism (ordinance or other regulatory mechanism) [City of Canton] will use to effectively prohibit illicit discharges into the MS4 and why [City of Canton] chose that mechanism. If [City of Canton] needs to develop this mechanism, describe a plan and a schedule to do so. If [City of Canton's] ordinance or other regulatory mechanism is already developed, include a copy of the relevant sections with [City of Canton's] program.

Response: The City of Canton is to utilize an ordinance as the regulatory mechanism to prohibit illicit discharges into the MS4. Ordinances are the typical legislative mechanisms for cities to utilize to formally adopt and meet state and federal regulations and to establish local law. Prior to 2009, older City ordinances were used to satisfy the regulatory intent of this minimum control measure. In 2009, a new storm water management ordinance was adopted. See "Storm water management ordinance" BMP below for further details.

Revisions: 2/1/11

Permit Part III.B.3.i.iii.: [City of Canton's] plan to ensure through appropriate enforcement procedures and actions that [its] illicit discharge ordinance (or other regulatory mechanism) is implemented.

Response: The City of Canton's "Storm Water Management Ordinance" includes prohibitions and enforcement mechanisms to ensure compliance with is possible. The ordinance provides for plan denials,

Notices Of Violations, Stop Work Orders, injunctive relief, civil proceedings, fines, etc. to be utilized accordingly. See "Storm water management ordinance" and other BMPs below for further details.

Revisions: 2/1/11

Permit Part III.B.3.i.iv.: [City of Canton's] plan to detect and address illicit discharges into [its] system, including discharges from illegal dumping and spills. [City of Canton's] plan shall include dry weather field screening for non-storm water flows and Ohio EPA recommends field tests of selected chemical parameters as indicators of discharge sources. [City of Canton] shall describe the mechanisms and strategies [it] will implement to ensure outfalls which have previously been dry-weather screened will not have future illicit connections. [City of Canton's] plan shall also address on-site sewage disposal systems (including failing on-lot HSTSs and off-lot discharging HSTSs) that flow into [City of Canton's] storm drainage system. [City of Canton's] description shall address the following, at a minimum:

Response: The City of Canton has a plan to detect and address illicit discharges in the MS4. The plan includes provisions for addressing discharges from illegal dumping and spills, dry-weather field-screening for non-storm water flows, safeguarding against illicit connections, addressing HSTSs, etc. See the BMPs below for further details.

Revisions: 2/1/11

Permit Part III.B.3.i.iv.1.: Procedures for locating priority areas which include areas with higher likelihood of illicit connections (e.g. areas with older sanitary sewer lines, for example) or ambient sampling to locate impacted reaches;

Response: The City of Canton has procedures in place for locating priority areas with higher likelihood of illicit connections, such as locating all HSTS properties, monitoring all storm and sanitary sewer connections by requiring permits and inspections, and identifying areas with sanitary sewers having high levels of inflow and infiltration. See "Locating areas with HSTSs", "Monitoring sewer connections", and "Resolving sanitary sewer I&I and illicit connections" BMPs below for further details.

Revisions: 2/1/11

Permit Part III.B.3.i.iv.2.: Procedures for tracing the source of an illicit discharge, including the specific techniques [City of Canton] will use to detect the location of the source;

Response: The City of Canton has procedures in place for tracing the sources of illicit discharges, such as sewer televising and sewer dye-testing. See "Televising storm sewers" and "Sewer dye-testing" BMPs below for further details.

Revisions: 2/1/11

Permit Part III.B.3.i.iv.3.: Procedures for removing the source of the illicit discharge; and

Response: The City of Canton has procedures in place for removing the source of illicit discharges. See "Procedures for removing the source of illicit discharges" BMP below for further details.

Revisions: 2/1/11

Permit Part III.B.3.i.iv.4.: Procedures for program evaluation and assessment.

Response: The City of Canton has procedures in place for program evaluation and assessment. See "Storm Water IDDE Program evaluation and assessment" BMP below for further details.

Revisions: 2/1/11

Permit Part III.B.3.i.v.: How [City of Canton] plans to inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste. Include in

[City of Canton's] description how this plan will coordinate with [City of Canton's] public education minimum measure and [its] pollution prevention/good housekeeping minimum measure programs.

Response: The City of Canton informs public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste via flyers, emails, articles in publications, workshops, etc. See "Illegal discharge and trash management education" BMP below for further details.

Revisions: 2/1/11

Permit Part III.B.3.i.vi.: Who is responsible for overall management and implementation of [City of Canton's] storm water illicit discharge detection and elimination program and, if different, who is responsible for each of the BMPs identified for this program.

Response: Even though the Assistant City Engineer in the Civil Division of the Engineering Department is the primary contact for the SWMP and responsible for preparing annual reports, the Service Director is responsible for the overall management and implementation of the City of Canton's IDDE Program. However, each BMP listed below identifies the particular City department or entity and position primarily responsible for the implementation of the respective BMP. Depending on the nature of the BMP, some may list more than one responsible position. Each responsible position is to maintain all records of supporting information for respective BMP implementation.

Revisions: 2/1/11

Permit Part III.B.3.i.vii.: How [City of Canton] will evaluate the success of this minimum measure, including how [City of Canton] selected the measurable goals for each of the BMPs.

Response: In time, the City of Canton is to measure the success of this MCM by determining if the measurable goals for the BMPs are met (through annual reports) as well as by implementing the BMPs in accordance with applicable recommendations as identified on USEPA's National Menu of Stormwater Best Management Practices. Each identified responsible position is to provide the respective information for Annual Reports to the Assistant City Engineer in the Civil Division of the City Engineering Department by no later than February 15th, annually. Ideally, the success of the City's SWMP may be evaluated based on the results of field monitoring in the Nimishillen Creek and/or other indicators. Each BMP listed below describes an associated measurable goal or goals. The goals were selected based on some practical and/or quantifiable (if possible) aspect of their implementation and the ease of measuring such aspect which provides simple indication of whether the BMP is successfully implemented.

Revisions: 2/1/11

PERFORMANCE STANDARDS:

Permit Part III.B.3.j.: The City of Canton's Storm Water IDDE Program shall include or have included an initial dry-weather screening of all storm water outfalls over the permit term. The City of Canton's IDDE Program shall establish priorities and specific goals for long-term system-wide surveillance of the City's MS4, as well as for specific investigations of outfalls and their tributary area where previous surveillance demonstrates a high likelihood of illicit discharges. Data collected each year shall be evaluated and priorities and goals shall be revised annually based on this evaluation. The City of Canton's comprehensive storm sewer system map shall be updated annually as needed.

ANNUAL REPORTING:

Permit Part III.B.3.k.: Annual Reports shall document the following: (1) number of outfalls dry-weather screened, (2) number of dry-weather flows identified, (3) number of illicit discharges identified, (4) number of illicit discharges eliminated, (5) schedules for elimination of illicit connections that have been identified but have yet to be eliminated, and (6) summary of any storm sewer system mapping updates.

Table 3

Minimum Control Measure (MCM)#3: Illicit Discharge Detection and Elimination

MCM#3 DEPARTMENTAL INVOLVEMENT

Summary of Departments/Responsible Positions with Considerable Involvement in MCM#3 and Associated Best Management Practices (BMPs)

Overall Authority	Department	Division	Responsible Position ¹	BMP #s ²	Total BMPs in MCM#3
Mayor	Mayor's Administration		Mayor	Not applicable	0
Mayor	Mayor's Administration		Management Assistant	Not applicable	0
Mayor	Mayor's Administration		Service Director	Not applicable	0
Service Director	Building Maintenance		Supervisor	Not applicable	0
Service Director	Civic Center		Manager	Not applicable	0
Service Director	Collection Systems		Superintendent	11, 12	2
Service Director	Development		Director	Not applicable	0
Service Director	Division of Motor Vehicles		Superintendent	Not applicable	0
Service Director	Sanitation		Superintendent	Not applicable	0
Service Director	Street		Superintendent	Not applicable	0
Service Director	Water		Superintendent	Not applicable	0
Service Director	Water Reclamation Facility		Superintendent	Not applicable	0
Service Director	Engineering		City Engineer	4, 5, 8, 10, 14, 15, 16, 18	8
City Engineer	Engineering	Civil	Assistant City Engineer	1, 7	2
City Engineer	Engineering	Traffic	Assistant City Engineer	Not applicable	0
Mayor	Mayor's Administration		Safety Director	Not applicable	0
Safety Director	Building	Zoning	Zoning Inspector	Not applicable	0
Safety Director	Fire		Chief	Not applicable	0
Safety Director	Police	Impound	Lieutenant	Not applicable	0
Board of Health	Health	Environmental Health	Environmental Health Director	2, 3, 6, 9, 13	5
Judges	Judges	Community Service	Community Service Director	Not applicable	0
Park Commission	Park		Director	Not applicable	0
Joint Recreation District	Recreation		Director	Not applicable	0
Stark County	SWCD		Urban Resource Coordinator	Not applicable	0

Footnotes:

1 – See Table B for Responsible Position contact information

2 – Refer to identified BMPs within this Minimum Control Measure section of the Storm Water Management Program for details

Revisions: 2/22/11

**Minimum Control Measure (MCM) #3: Illicit Discharge Detection and Elimination
 “Storm Water Illicit Discharge Detection and Elimination (IDDE) Program”: Best
 Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements**

1. **BMP#:** 1
2. **Permit Requirement:** Comprehensive storm sewer system map
3. **BMP Name (Permit Part III.A.1.a.):** MS4 Map
4. **BMP Description (Permit Part III.A.1.a.):** The City Engineering Department maintains hard copies of maps of storm and sanitary sewers, based on "as-built" data. These maps were used as a starting point for creating an electronic "base map" that was used to satisfy initial 2003 NPDES Small MS4 Permit requirements. Additional information as required in the 2009 permit is to be added to this map to satisfy the permit requirements. A comprehensive storm system map allows for effective investigations of potential contamination sources as well as providing potential containment and outfall locations for illicit discharges in the MS4. The MS4 map must be updated accordingly as new installations, replacements, realignments, and additions (due to annexations) to the MS4 occur frequently. Once the map is completed in electronic format, updates can occur quickly and efficiently.
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** Required per Part III.B.3.b.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Engineering Department (Civil Division)/Assistant City Engineer
8. **Agreement Needed for Implementation (Permit Part III.C.)?** No
9. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):** As required, map is to be developed within 5 years of coverage under 2009 renewal Small MS4 General Permit (by 6/4/2014)
10. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
11. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.3.k.):** Progress/status of map development; information required for Map; any necessary map updates
12. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):** Copy of map; supporting documentation of map development progress and/or updates, as necessary
13. **For Further BMP Guidance:** Refer to MCM#3: Illicit Discharge Detection and Elimination description on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

Revisions: 2/1/11

**Minimum Control Measure (MCM) #3: Illicit Discharge Detection and Elimination
 “Storm Water Illicit Discharge Detection and Elimination (IDDE) Program”: Best
 Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements**

1. **BMP#:** 2
2. **Permit Requirement:** Development and submittal of Home Sewage Treatment Systems (HSTS) list
3. **BMP Name (Permit Part III.A.1.a.):** HSTS list
4. **BMP Description (Permit Part III.A.1.a.):** Effluent from failing HSTSs often contain pollutant concentrations that exceed established water quality standards. A number of factors can cause on-lot HSTSs to fail, including unsuitable soil conditions, improper design and installation, and inadequate maintenance practices. Identifying and eliminating failing HSTSs help control untreated wastewater discharges that contaminate ground and surface water supplies. The City Health Department maintains all HSTS records for HSTS properties in the City. Due to the availability of sanitary sewer, new applications for HSTS installations are typically denied (see "Addressing HSTSs" BMP). In 2006-2007, the City Health Department identified and field-verified a total of 99 HSTS-properties within the City (by cross-checking City and County HSTS records and water and sewer utility billing records). Each property was individually checked for authenticity. All 99 HSTS-properties in the City of Canton are "on-lot HSTSs" (there are no "off-lot HSTS" in the City). The list was submitted to Ohio EPA in 2008.
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** Required per Part III.B.3.c.i. Also, this allows for effective investigations of potential contamination sources of water bodies.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Health Department/Environmental Health Director
8. **Agreement Needed for Implementation (Permit Part III.C.)?** No
9. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):** (HSTS list previously developed as required under the initial NPDES Permit and submitted to Ohio EPA in 2008); update list as necessary
10. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
11. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.3.k.):** Progress/status of HSTS list and any necessary updates
12. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):** Copy of list and supporting documentation, as applicable
13. **For Further BMP Guidance:** Refer to "Preventing Septic System Failure" and "Illicit Discharge Detection and Elimination..." BMPs and resources (under USEPA MCM#3: Illicit Discharge Detection and Elimination) on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

Revisions: 2/1/11

**Minimum Control Measure (MCM) #3: Illicit Discharge Detection and Elimination
 “Storm Water Illicit Discharge Detection and Elimination (IDDE) Program”: Best
 Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements**

1. **BMP#:** 3
2. **Permit Requirement:** Development and submittal of Home Sewage Treatment Systems (HSTS) map
3. **BMP Name (Permit Part III.A.1.a.):** HSTS map
4. **BMP Description (Permit Part III.A.1.a.):** Based on information obtained for the required HSTS list (see "HSTS list" BMP), an HSTS map was created using GIS software. The HSTS Map was finalized and submitted to Ohio EPA in 2008. Although the requirement for the development of an HSTS map is for HSTSs connected to discharge to the City's MS4 ("off-lot HSTSs"), there are only "on-lot HSTSs" in the City of Canton. Therefore, the HSTS map only shows the locations of the "on-lot HSTSs" in Canton.
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** Required per Part III.B.3.c.ii. Also, this allows for effective investigations of potential contamination sources of water bodies.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Health Department/Environmental Health Director
8. **Agreement Needed for Implementation (Permit Part III.C.)?** No
9. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):** (HSTS map previously developed as required under the initial NPDES Permit and submitted to Ohio EPA in 2008); update map as necessary
10. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
11. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.3.k.):** Progress/status of HSTS map and any necessary updates
12. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):** Copy of map and supporting documentation, as applicable
13. **For Further BMP Guidance:** Refer to "Preventing Septic System Failure" and "Illicit Discharge Detection and Elimination..." BMPs and resources (under USEPA MCM#3: Illicit Discharge Detection and Elimination) on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

Revisions: 2/1/11

**Minimum Control Measure (MCM) #3: Illicit Discharge Detection and Elimination
 “Storm Water Illicit Discharge Detection and Elimination (IDDE) Program”: Best
 Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements**

1. **BMP#:** 4
2. **Permit Requirement:** Ordinance or other regulatory mechanism prohibiting illicit discharges into storm sewer system
3. **BMP Name (Permit Part III.A.1.a.):** Storm Water Management Ordinance
4. **BMP Description (Permit Part III.A.1.a.):** Parts of Chapters 221 (Health Hazards), 223 (Private Water Systems), and 225 (Household Sewage Disposal Systems) of Title Three - Environmental Health - of the Canton City Health Code, and Part Five (General Offenses Code), Part Seven (Business Regulation Code), Part Nine (Streets, Utilities, and Public Services Code), and Part Thirteen (Building Code) of the City of Canton Codified Ordinances collectively regulate illicit discharges. In addition, in 2009 the City adopted a "Storm Water Management" ordinance (Chapter 961 of Part Nine - Streets, Utilities, and Public Services Code) which is intended to consolidate provisions within existing ordinances and satisfy permit requirements that were are not addressed by existing City ordinances. Chapter 961 includes prohibitions of illicit discharges into the MS4, violations, enforcement, penalties, etc. Refer to Chapter 961 "Storm Water Management" ordinance and the "City of Canton Storm Water Management Manual" for further details.
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** Required per Part III.B.3.d.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Engineering Department/City Engineer
8. **Agreement Needed for Implementation (Permit Part III.C.)?** No
9. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):**
 - a. Continue to prohibit illicit discharges to MS4 through "Storm Water Management" ordinance
 - b. Ensure ordinance meets current permit requirements
10. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
11. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.3.k.):**
 - a. Indication if illicit discharges to MS4 are prohibited by ordinance
 - b. Summary of any relevant revisions to ordinance
12. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):**
 - a. Copy of current ordinance
 - b. Supporting documentation, as applicable
13. **For Further BMP Guidance:** Refer to MCM#3: “Illicit Discharge Detection and Elimination” description on USEPA's National Menu of Best Management Practices on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

Revisions: 2/1/11

**Minimum Control Measure (MCM) #3: Illicit Discharge Detection and Elimination
 “Storm Water Illicit Discharge Detection and Elimination (IDDE) Program”: Best
 Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements**

1. **BMP#:** 5
2. **Permit Requirement:** Plan to Detect and Eliminate Non-Storm Water/Illicit Discharges to MS4: Addressing illicit discharges, including discharges from illegal dumping and spills
3. **BMP Name (Permit Part III.A.1.a.):** Illicit discharge protocols
4. **BMP Description (Permit Part III.A.1.a.):** Illicit discharges to the MS4 are prohibited by Chapter 961 of the City of Canton Codified Ordinances. To assist in administration of the ordinance, the City has prepared employee protocols for responses to any known or suspected illicit discharge in the MS4. Depending on the nature of the illicit discharge, different departments (Health, Building, Fire, or Stark SWCD) may become involved with investigation, remediation, and enforcement, as applicable. The protocols include required notification to the Fire Department within 15 minutes of report or discovery of any known or suspected hazardous discharge (this is also required by ordinance). The Fire Department also has internal protocol to follow which includes involving the HazMat Team, Collection Systems (Sewer) Department, etc., as necessary, as well as containment, cleanup, and source-tracing provisions.

Littering and illegal dumping are prohibited by Codified Ordinance Chapter 521.08 and are handled through the City Health Department. Any illicit discharges into the MS4 resulting from illegal dumping and spills are to be addressed the same way as all other illicit discharges per City protocols.

Departments involved in investigation, remediation, and enforcement of illicit discharges to the MS4 are required to file a report to document the actions taken in response to the illicit discharge, including the status of any necessary enforcement. A copy of the report is forwarded to the City Engineer for record-keeping purposes and to follow-up on any unaddressed status issues.

5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** BMP assists in satisfying Part III.B.e.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):**
Engineering Department/City Engineer
8. **Agreement Needed for Implementation (Permit Part III.C.)?** No
9. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):**
 - a. Address illicit discharges as per established protocol and in accordance with other applicable BMPs.
 - b. Update Illicit Discharge Protocols accordingly and ensure appropriate departments receive a copy of current protocols
10. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
11. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.3.k.):**
 - a. Based on illicit discharge reports submitted to City Engineer, summarize number of illicit discharges identified, locations, number of illicit discharges eliminated, dates, schedules for elimination of identified illicit connections, etc.
 - b. Indication of any updates to protocols and whether appropriate departments have received a copy of current protocols
12. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):**
 - a. City Engineer to maintain copy of “Report for Illicit Discharge in MS4” for all responses to illicit discharges in MS4
 - b. Copy of written protocols and any supporting information, as applicable

13. For Further BMP Guidance: Refer to MCM#3: Illicit Discharge Detection and Elimination description on USEPA's National Menu of Best Management Practices on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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**Minimum Control Measure (MCM) #3: Illicit Discharge Detection and Elimination
 “Storm Water Illicit Discharge Detection and Elimination (IDDE) Program”: Best
 Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements**

1. **BMP#:** 6
2. **Permit Requirement:** Plan to Detect and Eliminate Non-Storm Water/Illicit Discharges to MS4: Provisions for addressing Household Sewage Treatment Systems (HSTs)
3. **BMP Name (Permit Part III.A.1.a.):** Addressing HSTs
4. **BMP Description (Permit Part III.A.1.a.):** Chapter 225 of the Canton City Health Code regulates Household Sewage Disposal Systems. The regulations reference Chapter 3701-29 of the Ohio Administrative Code as the minimum compliance standard for enforcement by the City Health Department. Chapter 225 of the Canton City Health Code also prohibits the installation, maintenance, or operation of HSTs on property within the City provided a public sanitary sewer is within 200 feet of such property. Registration of HST installers and sewage tank cleaners is required with the Health Department. Specific maintenance requirements are also required per Chapter 225. The Health Department has the authority to inspect HSTs, sample the effluent, or take any other steps deemed necessary to insure proper compliance with OAC 3701-29-01 to 3701-29-21. Chapter 209 of the City Health Code provides for any necessary enforcement, inspection, and penalty. There are 99 "on-lot HSTs" and no "off-lot HSTs" in the City (See "HSTs list" BMP).
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** Required per Part III.B.e. and subsections i.-iv.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Health Department/Environmental Health Director
8. **Agreement Needed for Implementation (Permit Part III.C.)?** No
9. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):**
 - a. Continue to regulate HSTs per Chapter 225 of the Canton City Health Code
 - b. Address HSTs in accordance with permit requirements Part III.B.e and subsections i.-iv., as applicable
10. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
11. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.3.k.):**
 - a. Summary of # of "on-lot" and "off-lot" HSTs within City, # of HSTs identified as illicit discharges to MS4
 - b. Progress of addressing HSTs per permit requirements, as applicable
12. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):**
 - a. Supporting HST records and inspection documentation
 - b. Supporting documentation, as applicable
13. **For Further BMP Guidance:** Refer to "Preventing Septic System Failure" and "Illicit Discharge Detection and Elimination..." BMPs and resources (under USEPA MCM#3: Illicit Discharge Detection and Elimination) on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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**Minimum Control Measure (MCM) #3: Illicit Discharge Detection and Elimination
 “Storm Water Illicit Discharge Detection and Elimination (IDDE) Program”: Best
 Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements**

1. **BMP#:** 7
2. **Permit Requirement:** Plan to Detect and Eliminate Non-Storm Water/Illicit Discharges to MS4: Dry-weather field-screening of storm water outfalls for non-storm water flows
3. **BMP Name (Permit Part III.A.1.a.):** Dry-weather field-screening of storm water outfalls
4. **BMP Description (Permit Part III.A.1.a.):** Dry-weather field-screening of storm water outfalls is to occur at all storm water outfalls identified by the City Engineering Department via the Storm Sewer System Map created under the initial 2003 NPDES permit or as otherwise updated. An initial dry-weather screening of outfalls was conducted by the City Engineering Department in 2007 in cooperation with initial permit requirements. Results were tabulated in a spreadsheet. This spreadsheet is to be utilized for conducting future screenings. By performing dry-weather field-screenings, illicit discharges may be easier to detect, trace, and eliminate.
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** Required per Part III.B.3.i.iv.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Engineering Department (Civil Division)/Assistant City Engineer
8. **Agreement Needed for Implementation (Permit Part III.C.)?** No
9. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):** Perform minimum of one dry-weather field screening of all identified outfalls during 2nd permit term (between 2009-2014)
10. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
11. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.3.k.):** Total # of outfalls, # of outfalls dry-weather screened; # of dry-weather flows identified
12. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):** Outfall database and inspection records
13. **For Further BMP Guidance:** Refer to "Illicit Discharge Detection and Elimination: A Guidance Manual for Program Development and Technical Assessments" resource (under USEPA MCM#3: Illicit Discharge Detection and Elimination) on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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**Minimum Control Measure (MCM) #3: Illicit Discharge Detection and Elimination
 “Storm Water Illicit Discharge Detection and Elimination (IDDE) Program”: Best
 Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements**

1. **BMP#:** 8
2. **Permit Requirement:** Plan to Detect and Eliminate Non-Storm Water/Illicit Discharges to MS4: Mechanisms and strategies to ensure previously dry-weather field-screened outfalls will not have future illicit connections
3. **BMP Name (Permit Part III.A.1.a.):** Mechanisms and strategies to ensure previously dry-weather field-screened outfalls will not have future illicit connections
4. **BMP Description (Permit Part III.A.1.a.):** Any dry-weather flows discovered during dry-weather field-screenings of storm water outfalls are to be noted accordingly and further evaluated. If identified as a possible illicit discharge, existing illicit discharge protocols are to be followed (see "Illicit discharge protocols" BMP). In addition, Codified Ordinance Part 9 regulates connections to public utilities. Permits are required to be obtained from the City Engineering Department for any proposed connection to public storm or sanitary sewer. Dry-weather flow locations are to be located on a map and used in conjunction with the Storm Sewer System Map as an attempt to identify sections of the MS4 to focus priorities for elimination of illicit discharges.
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** Required per Part III.B.3.i.iv.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Engineering Department/City Engineer
8. **Agreement Needed for Implementation (Permit Part III.C.)?** No
9. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):**
 - a. Develop map showing screened outfalls with dry-weather flows
 - b. Identify priority areas on map
10. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
11. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.3.k.):**
 - a. Progress/status of map development
 - b. Status of addressing identified priority areas
12. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):**
 - a. Map and supporting documentation
 - b. Supporting documentation, as applicable
13. **For Further BMP Guidance:** Refer to "Illicit Discharge Detection and Elimination: A Guidance Manual for Program Development and Technical Assessments" resource (under USEPA MCM#3: Illicit Discharge Detection and Elimination) on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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**Minimum Control Measure (MCM) #3: Illicit Discharge Detection and Elimination
 “Storm Water Illicit Discharge Detection and Elimination (IDDE) Program”: Best
 Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements**

1. **BMP#:** 9
2. **Permit Requirement:** Plan to Detect and Eliminate Non-Storm Water/Illicit Discharges to MS4: Procedures for locating priority areas with higher likelihood of illicit connections
3. **BMP Name (Permit Part III.A.1.a.):** Locating areas with HSTSs
4. **BMP Description (Permit Part III.A.1.a.):** In 2006-2007, the City Health Department identified and field-verified a total of 99 HSTS-properties within the City (see "HSTS list" and "HSTS map" BMPs). All 99 HSTS-properties in the City of Canton are "on-lot HSTSs" (there are no "off-lot HSTS" in the City). The Health Department may utilize inspection reports or other data submitted or obtained from reliable sources to determine compliance. HSTS monitoring is typically reactive, based on odor and visual complaints from residents or city employees. The Health Department has the authority to inspect any HSTS, sample the effluent, or take any other steps deemed necessary to insure proper compliance with applicable portions of the Ohio Administrative Code and Canton City Health Code.
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** BMP assists in satisfying Part III.B.3.i.iv.1.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Health Department/Environmental Health Director
8. **Agreement Needed for Implementation (Permit Part III.C.)?** No
9. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):** Locate all properties with HSTSs (see “HSTS list” and “HSTS map” BMPs)
10. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** (see “HSTS list” and “HSTS map” BMPs)
11. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.3.k.):** (see “HSTS list” and “HSTS map” BMPs)
12. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):** (see “HSTS list” and “HSTS map” BMPs)
13. **For Further BMP Guidance:** Refer to "Preventing Septic System Failure" and "Illicit Discharge Detection and Elimination..." BMPs and resources (under USEPA MCM#3: Illicit Discharge Detection and Elimination) on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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**Minimum Control Measure (MCM) #3: Illicit Discharge Detection and Elimination
 “Storm Water Illicit Discharge Detection and Elimination (IDDE) Program”: Best
 Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements**

1. **BMP#:** 10
2. **Permit Requirement:** Plan to Detect and Eliminate Non-Storm Water/Illicit Discharges to MS4: Procedures for locating priority areas with higher likelihood of illicit connections
3. **BMP Name (Permit Part III.A.1.a.):** Monitoring sewer connections
4. **BMP Description (Permit Part III.A.1.a.):** Chapters 909 and 961 of City Codified Ordinances contain provisions for required permits, fees, and inspections for excavations within City right-of-way. Therefore, any time a person wants to install, connect, or modify a storm or sanitary sewer, a permit must be obtained from and the work inspected by the City Engineering Department. Suspect illicit sanitary connections to the MS4 may arise due to complaints of foul odors or other sewage evidence in the MS4, evidence of dry-weather flows, evidence of unpermitted work performed on City-owned sewers, routine MS4 inspections, etc. Upon identifying such illicit connections, illicit discharge protocols are followed. All illicit connections are considered priorities.
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** BMP assists in satisfying Part III.B.3.i.iv.1.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Engineering Department/City Engineer
8. **Agreement Needed for Implementation (Permit Part III.C.)?** No
9. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):** Continue to require permits for sanitary and storm sewer installations, connections, and modifications
10. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
11. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.3.k.):** Indication if permits continue to be required
12. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):** Supporting documentation, as applicable
13. **For Further BMP Guidance:** Refer to "Reducing the Occurrence of SSOs" and "Illicit Discharge Detection and Elimination..." BMPs and resources (under USEPA MCM#3: Illicit Discharge Detection and Elimination) on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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**Minimum Control Measure (MCM) #3: Illicit Discharge Detection and Elimination
 “Storm Water Illicit Discharge Detection and Elimination (IDDE) Program”: Best
 Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements**

1. **BMP#:** 11
2. **Permit Requirement:** Plan to Detect and Eliminate Non-Storm Water/Illicit Discharges to MS4: Procedures for locating priority areas with higher likelihood of illicit connections
3. **BMP Name (Permit Part III.A.1.a.):** Resolving sanitary sewer inflow, infiltration, and illicit connections
4. **BMP Description (Permit Part III.A.1.a.):** Sanitary sewer overflows (SSOs) are releases of raw sewage from a separate sanitary sewer system before it has reached a treatment facility. SSOs occur when the flow into the system exceeds the design capacity of the conveyance system, resulting in discharges into basements, streets, and streams. Sewage overflowing from a manhole is a common SSO, and it frequently results in untreated sewage flowing into an MS4 or stream. SSOs can also occur due to the presence of too much inflow and infiltration (I&I) of storm water, ground water, and/or other non-sanitary flows. The City Collection Systems (Sewer) Department routinely televises sanitary sewer mains and checks for high levels of I&I. Areas with sanitary sewers having high levels of I&I and/or illegal/illicit connections are considered priorities. These areas are further evaluated and investigated to resolve such problems so that SSOs do not occur resulting in illicit discharges into the MS4.
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** BMP assists in satisfying Part III.B.3.i.iv.1.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Collection Systems (Sewer) Department/Superintendent
8. **Agreement Needed for Implementation (Permit Part III.C.)?** No
9. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):** Continue to routinely televise sanitary sewers for potential I&I and illegal/illicit connections.
10. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
11. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.3.k.):** Summary of footage of sanitary sewers televised, status of high I&I and/or illegal/illicit connections found
12. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):** Supporting documentation, as applicable
13. **For Further BMP Guidance:** Refer to "Reducing the Occurrence of SSOs" and "Illicit Discharge Detection and Elimination..." BMPs and resources (under USEPA MCM#3: Illicit Discharge Detection and Elimination) on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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**Minimum Control Measure (MCM) #3: Illicit Discharge Detection and Elimination
“Storm Water Illicit Discharge Detection and Elimination (IDDE) Program”: Best
Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements**

1. **BMP#:** 12
2. **Permit Requirement:** Plan to Detect and Eliminate Non-Storm Water/Illicit Discharges to MS4: Procedures for tracing the source of illicit discharges, including specific techniques
3. **BMP Name (Permit Part III.A.1.a.):** Televising storm sewers
4. **BMP Description (Permit Part III.A.1.a.):** Upon investigation of known or suspected illicit discharges into the MS4, when the source of the discharge is unknown and when other investigative procedures (visual inspections) are inconclusive, the Collection Systems (Sewer) Department can televise suspect sewers as an inspection practice to attempt to trace the source of discharges and/or verify conditions and connectivity of lines. Using either a stick camera (stationary) or mobile sewer video camera and video recording equipment, the City has been televising storm and sanitary sewers since 1996. Depending on findings, certain decisions can be made if further actions are needed to reduce floatables and other pollutants to and from the MS4.
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** BMP assists in satisfying Part III.B.3.i.iv.2. and Part III.B.6.d.iii.1.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Collection Systems (Sewer) Department/Superintendent
8. **Agreement Needed for Implementation (Permit Part III.C.)?** No
9. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):** Continue to televise suspect storm sewers as deemed necessary
10. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
11. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.3.k.):** Summary of footage of storm sewers televised; status of findings, as applicable
12. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):** Supporting documentation, as applicable
13. **For Further BMP Guidance:** Refer to "Reducing the Occurrence of SSOs" and "Illicit Discharge Detection and Elimination..." BMPs and resources (under USEPA MCM#3: Illicit Discharge Detection and Elimination) on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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 “Storm Water Illicit Discharge Detection and Elimination (IDDE) Program”: Best
 Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements**

1. **BMP#:** 13
2. **Permit Requirement:** Plan to Detect and Eliminate Non-Storm Water/Illicit Discharges to MS4: Procedures for tracing the source of illicit discharges, including specific techniques
3. **BMP Name (Permit Part III.A.1.a.):** Sewer dye-testing
4. **BMP Description (Permit Part III.A.1.a.):** Upon investigation of known or suspected illicit discharges into the MS4, when the source of the illicit discharge is unknown and when other investigative procedures (visual inspections) are inconclusive, the City Health Department can dye test storm and sanitary sewers as an inspection procedure to attempt to trace the source of the illicit discharges and verify connectivity of drains to storm or sanitary sewers. In accordance with illicit discharge protocols, the involvement of the City Health Department to provide dye-testing is typically initiated by the Fire Department or City Engineering Department. Depending on findings, certain decisions can be made if further actions are needed to reduce floatables and other pollutants to and from the MS4.
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** BMP assists in satisfying Part III.B.3.i.iv.2. and Part III.B.6.d.iii.1.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Health Department/Environmental Health Director
8. **Agreement Needed for Implementation (Permit Part III.C.)?** No
9. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):** Continue to utilize dye testing procedures and techniques, as necessary
10. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
11. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.3.k.):** Summary of locations and dates where dye-testing techniques are being used; summary of findings, as applicable
12. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):** Supporting documentation, as applicable
13. **For Further BMP Guidance:** Refer to "Reducing the Occurrence of SSOs" and "Illicit Discharge Detection and Elimination..." BMPs and resources (under USEPA MCM#3: Illicit Discharge Detection and Elimination) on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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 “Storm Water Illicit Discharge Detection and Elimination (IDDE) Program”: Best
 Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements**

1. **BMP#:** 14
2. **Permit Requirement:** Plan to Detect and Eliminate Non-Storm Water/Illicit Discharges to MS4: Procedures for removing the source of illicit discharges
3. **BMP Name (Permit Part III.A.1.a.):** Procedures for removing the source of illicit discharges
4. **BMP Description (Permit Part III.A.1.a.):** If the source of an illicit discharge into the MS4 is confirmed, the abatement of the illicit discharge requires removal of the source, and the source can be traced to a responsible party, Chapter 961 of Part 9 of the City Codified Ordinances provides provisions for the issuance of a Notice of Violation to the responsible party. The Notice of Violation sets forth a deadline within which such remediation (removal) or restoration must be completed. Said Notice further advises that, should the responsible party fail to remediate (remove) or restore within the established deadline, the City has the right to perform said remediation (removal) or restoration, assess the costs of such work to the responsible person, party, or entity, and initiate any other legal action and administrative penalty for enforcement in accordance with the provisions of Chapter 961.
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** Required per Part III.B.3.i.iv.3.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Engineering Department/City Engineer
8. **Agreement Needed for Implementation (Permit Part III.C.)?** No
9. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):** Continue to adhere to illicit discharge removal provisions within Chapter 961 of the City Codified Ordinances
10. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
11. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.3.k.):** Summary of locations where sources of illicit discharges are removed; dates; total number of removals
12. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):** Supporting documentation, as applicable
13. **For Further BMP Guidance:** Refer to "Illicit Discharge Detection and Elimination..." BMPs and resources (under USEPA MCM#3: Illicit Discharge Detection and Elimination) on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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**Minimum Control Measure (MCM) #3: Illicit Discharge Detection and Elimination
“Storm Water Illicit Discharge Detection and Elimination (IDDE) Program”: Best
Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements**

1. **BMP#:** 15
2. **Permit Requirement:** Plan to Detect and Eliminate Non-Storm Water/Illicit Discharges to MS4: Procedures for program/plan evaluation and assessment
3. **BMP Name (Permit Part III.A.1.a.):** Storm Water IDDE Program evaluation and assessment
4. **BMP Description (Permit Part III.A.1.a.):** It is vital to the success of this MCM that the City's Storm Water IDDE Program is routinely evaluated and assessed by appropriate personnel and modified accordingly as needed. Key departments involved in this BMP are Engineering, Collection Systems (Sewer), Fire Department, and Health.
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** Required per Part III.B.3.i.iv.4.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Engineering Department/City Engineer
8. **Agreement Needed for Implementation (Permit Part III.C.)?** No
9. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):** Conduct annual meeting with key personnel to evaluate and assess IDDE Program; revise IDDE Program as needed
10. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
11. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.3.k.):** Meeting date; description of attendees; relevant revisions
12. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):** Copy of meeting agenda; list of attendees; supporting documentation of IDDE Program revisions, as applicable
13. **For Further BMP Guidance:** Refer to "Illicit Discharge Detection and Elimination..." BMPs and resources (under USEPA MCM#3: Illicit Discharge Detection and Elimination) on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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**Minimum Control Measure (MCM) #3: Illicit Discharge Detection and Elimination
 “Storm Water Illicit Discharge Detection and Elimination (IDDE) Program”: Best
 Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements**

1. **BMP#:** 16
2. **Permit Requirement:** Plan to Detect and Eliminate Non-Storm Water/Illicit Discharges to MS4: Addressing certain categories of non-storm water discharges/ flows identified as significant contributors of pollutants to MS4
3. **BMP Name (Permit Part III.A.1.a.):** Addressing non-storm water discharges identified as significant contributors of pollutants to MS4
4. **BMP Description (Permit Part III.A.1.a.):** The City of Canton is authorized to discharge those non-storm water sources described in permit Part I.B.3.b. provided that Ohio EPA has not determined, and notified the City in writing, that such sources are substantial contributors of pollutants to Canton's MS4. Upon recognition of any other non-storm water discharges/flows that do not fit within the referenced categories, the City of Canton is to evaluate such discharge and determine if they are significant contributors of pollutants to its MS4. The City Health Department may be utilized, as necessary, to provide appropriate testing of such discharges for proper evaluation. If determined to be a significant contributor of pollutants to the MS4, the City of Canton is to address such discharges as illicit discharges in accordance with illicit discharge protocol.
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** Required per Part III.B.3.g.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Engineering Department/City Engineer
8. **Agreement Needed for Implementation (Permit Part III.C.)?** No
9. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):** Identify such discharges and evaluate whether they should be addressed as illicit discharges, as necessary
10. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
11. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.3.k.):** Types of such discharges to be addressed as illicit discharges, as necessary
12. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):** Supporting documentation, as applicable
13. **For Further BMP Guidance:** Refer to "Illicit Discharge Detection and Elimination..." BMPs and resources (under USEPA MCM#3: Illicit Discharge Detection and Elimination) on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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**Minimum Control Measure (MCM) #3: Illicit Discharge Detection and Elimination
“Storm Water Illicit Discharge Detection and Elimination (IDDE) Program”: Best
Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements**

1. **BMP#:** 17
2. **Permit Requirement:** Inform public employees, businesses, and general public of hazards associated with illegal discharges and improper disposal of waste
3. **BMP Name (Permit Part III.A.1.a.):** Illegal discharge and trash management education
4. **BMP Description (Permit Part III.A.1.a.):** (This requirement is addressed under MCM#1. See "Illegal discharge and trash management education" and "Government employee training/ education" BMPs under MCM#1 for details.)
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** Required per Part III.B.3.f.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** (See BMP Description)
7. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** (See BMP Description)
8. **Agreement Needed for Implementation (Permit Part III.C.):** (See BMP Description)
9. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):** (See BMP Description)
10. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** (See BMP Description)
11. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.3.k.):** (See BMP Description)
12. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):** (See BMP Description)
13. **For Further BMP Guidance:** (See BMP Description)

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**Minimum Control Measure (MCM) #3: Illicit Discharge Detection and Elimination
 “Storm Water Illicit Discharge Detection and Elimination (IDDE) Program”: Best
 Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements**

1. **BMP#:** 18
2. **Permit Requirement:** Development of list of occasional incidental non-storm water discharges not to be addressed as illicit discharges
3. **BMP Name (Permit Part III.A.1.a.):** List of non-storm water discharges not to be addressed as illicit discharges
4. **BMP Description (Permit Part III.A.1.a.):** The City of Canton is authorized to discharge those non-storm water sources described in permit Part I.B.3.b. provided that Ohio EPA has not determined, and notified the City in writing, that such sources are substantial contributors of pollutants to Canton's MS4. Upon recognition of any other non-storm water discharges/flows that do not fit within the referenced categories, the City of Canton is to evaluate such discharge and determine if they are significant contributors of pollutants to its MS4. The City Health Department may be utilized, as necessary, to provide appropriate testing of such discharges for proper evaluation. If determined to not be a significant contributor of pollutants to the MS4, the City of Canton is not to address such discharges as illicit discharges. The City Engineer is to maintain a list of such "allowable" non-storm water discharges. Due to the nature of this BMP, such list will be continually evolving, as necessary.
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** Optional per Part III.B.3.h.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Engineering Department/City Engineer
8. **Agreement Needed for Implementation (Permit Part III.C.)?** No
9. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):** Maintain a list of such "allowable" discharges, as necessary.
10. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
11. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.3.k.):** Descriptions of "allowable" non-storm water discharges, as applicable
12. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):** List and supporting documentation, as applicable
13. **For Further BMP Guidance:** Refer to "Illicit Discharge Detection and Elimination..." BMPs and resources (under USEPA MCM#3: Illicit Discharge Detection and Elimination) on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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4 Minimum Control Measure (MCM) #4: Construction Site Storm Water Runoff Control

“Construction Site Storm Water Runoff Control Program”: Overview

MCM PERMIT REQUIREMENTS:

Permit Part III.B.4.a.: [City of Canton] shall develop, implement, and enforce a program to reduce pollutants in any storm water runoff to [City of Canton's] MS4 from construction activities that result in land disturbance of greater than or equal to one acre. Reduction of pollutants in storm water discharges from construction activity disturbing less than one acre shall be included in [City of Canton's] program if that construction activity is part of a larger common plan of development or sale that would disturb one acre or more. If Ohio EPA waives requirements for storm water discharges associated with small construction from a specific site, [City of Canton] is not required to enforce its program to reduce pollutant discharges from such site(s). [City of Canton's] program shall include the development and implementation of, at a minimum:

Permit Part III.B.4.a.i.: An ordinance or other regulatory mechanism to require erosion and sediment controls, as well as sanctions to ensure compliance, to the extent allowable under State or local law. [City of Canton's] ordinance or other regulatory mechanism shall, at a minimum, be equivalent with the technical requirements set forth in the Ohio NPDES General Storm Water Permit(s) for Construction Activities applicable to [City of Canton's] permit area which have been issued at the time of issuance of this permit. This would include the following Ohio EPA NPDES General Storm Water Permits for Construction Activities: OHC000003, OHCD00001, and OHCO00001. If [City of Canton] initially had coverage under a previous version of this permit [City of Canton] shall revise [City of Canton's] ordinance or other regulatory mechanism, if needed, within two years of when [City of Canton's] coverage under this permit was granted [6/4/09];

Permit Part III.B.4.a.ii.: Requirements for construction site operators to implement appropriate erosion and sediment control BMPs;

Permit Part III.B.4.a.iii.: Requirements for construction site operators to control waste such as, but not limited to, discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that may cause adverse impacts to water quality;

Permit Part III.B.4.a.iv.: Procedures for storm water pollution prevention plan review which incorporate consideration of potential water quality impacts;

Permit Part III.B.4.a.v.: Procedures for receipt and consideration of information submitted by the public; and

Permit Part III.B.4.a.vi.: Procedures for site inspection and enforcement of control measures.

DECISION PROCESS (RATIONALE STATEMENT) FOR DEVELOPMENT OF CONSTRUCTION SITE STORM WATER CONTROL PROGRAM:

Permit Part III.B.4.b.: [City of Canton] shall document [its] decision process for the development of a construction site storm water control program. [City of Canton's] rationale statement shall address both [City of Canton's] overall construction site storm water control program and the individual BMPs, measurable goals, and responsible person for [City of Canton's] program.

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Response: The City of Canton supports EPA's assessment that polluted stormwater runoff from construction sites often flows to MS4s and ultimately is discharged into local rivers and streams. Pollutants commonly discharged from construction sites include: sediment, solid and sanitary wastes, phosphorous (fertilizer), nitrogen (fertilizer), pesticides, oil and grease, concrete truck washout, construction chemicals, and construction debris. The resulting of pollutants from construction sites can cause physical, chemical, and biological harm to our nation's waters. See USEPA's Stormwater Phase II Final Rule Fact Sheet Series at <http://cfpub.epa.gov/npdes/stormwater/swfinal.cfm> for further information on the NPDES Phase II Small MS4 Storm Water Program and the associated Minimum Control Measures.

The City of Canton is to implement the BMPs described below as part of its Construction Site Storm Water Runoff Control Program to reduce pollutants in stormwater runoff to its MS4 from construction activities that result in land disturbances of greater than or equal to one acre. The identified BMPs are those that the City believes are needed to meet permit requirements and/or expectations. See "Construction Site Stormwater Runoff Control" on USEPA's National Menu of Stormwater Best Management Practices at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/> for further BMP guidance and information.

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Permit Part III.B.4.b.: The rationale statement shall include the following information, at a minimum:

Permit Part III.B.4.b.i.: The mechanism (ordinance or other regulatory mechanism) [City of Canton] will use to require erosion and sediment controls at construction sites and why [City of Canton] chose that mechanism. If [City of Canton] needs to develop this mechanism, describe [City of Canton's] plan and a schedule to do so. If [City of Canton's] ordinance or other regulatory mechanism is already developed, include a copy of the relevant sections with [City of Canton's] SWMP description;

Response: The City of Canton is to utilize an ordinance as the regulatory mechanism to require erosion and sediment controls at construction sites. Ordinances are the typical legislative mechanisms for cities to utilize to formally adopt and meet state and federal regulations and to establish local law. Prior to 2009, older City ordinances were used to satisfy the regulatory intent of this minimum control measure. In 2009, a new storm water management ordinance was adopted. See "Storm Water Management Ordinance" BMP below for further details.

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Permit Part III.B.4.b.ii.: [City of Canton's] plan to ensure compliance with [its] erosion and sediment control regulatory mechanism, including the sanctions and enforcement mechanisms [City of Canton] will use to ensure compliance. Describe [City of Canton's] procedures for when [City of Canton] will use certain sanctions. Possible sanctions include non-monetary penalties (such as stop-work orders), fines, bonding requirements, and/or permit denials for non-compliance.

Response: The City of Canton's "Storm Water Management Ordinance" includes sanctions and enforcement mechanisms to ensure compliance. The ordinance provides for plan denials, Notices Of Violations, Stop Work Orders, injunctive relief, civil proceedings, fines, etc. to be utilized accordingly. See "SWP3 reviews" and "Construction site inspections and enforcement" BMPs below for further details.

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Permit Part III.B.4.b.iii.: [City of Canton's] requirements for construction site operators to implement appropriate erosion and sediment control BMPs and control waste at construction sites that may cause adverse impacts to water quality. Such waste includes, but is not limited to, discarded building materials, concrete truck washouts, chemicals, litter, and sanitary waste;

Response: The City of Canton requires construction site operators to implement appropriate erosion and sediment control BMPs and control waste (discarded building materials, concrete truck washouts, chemicals,

litter, and sanitary waste, etc.) at construction sites that may cause adverse impacts to water quality. See "Construction site storm water runoff quality controls" BMP below for further details.

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Permit Part III.B.4.b.iv.: [City of Canton's] procedures for pre-construction storm water pollution prevention plan review which incorporate consideration of potential water quality impacts. Describe the estimated number and percentage of sites that will have pre-construction site plans reviewed;

Response: Through a Memorandum Of Understanding between the City of Canton and the Stark SWCD, procedures for pre-construction SWP3 reviews which incorporate consideration of potential water quality impacts are established. 100% of applicable proposed land disturbance activities are required to have SWP3s submitted, reviewed, and approved prior to construction activities taking place. The number of overall annual site plan reviews is difficult to estimate since it is highly dependent on the development economy. See "SWP3 reviews" BMP below for further details.

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Permit Part III.B.4.b.v.: [City of Canton's] procedures for receipt and consideration of information submitted by the public. Consider coordinating this requirement with [City of Canton's] public education program;

Response: The City of Canton has established procedures for the consideration of information submitted by the public. See "Procedures for receipt and consideration of information submitted by public" BMP below for further details.

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Permit Part III.B.4.b.vi.: [City of Canton's] procedures for site inspection and enforcement of control measures, including how [City of Canton] will prioritize sites for inspection;

Response: The City of Canton has established procedures for site inspection and enforcement of control measures, including how sites are prioritized for inspection. See "Construction site inspections and enforcement" BMP below for further details.

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Permit Part III.B.4.b.vii.: Who is responsible for overall management and implementation of [City of Canton's] construction site storm water control program and, if different, who is responsible for each of the BMPs identified for this program; and

Response: Even though the Assistant City Engineer in the Civil Division of the Engineering Department is the primary contact for the SWMP and responsible for preparing annual reports, the Service Director is responsible for the overall management and implementation of the City of Canton's construction site storm water control program. However, each BMP listed below identifies the particular City department or entity and position primarily responsible for the implementation of the respective BMP. Depending on the nature of the BMP, some may list more than one responsible position. Each responsible position is to maintain all records of supporting information for respective BMP implementation.

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Permit Part III.B.4.b.viii.: Describe how [City of Canton] will evaluate the success of this minimum control measure, including how [City of Canton] selected the measurable goals for each of the BMPs.

Response: In time, the City of Canton is to measure the success of this MCM by determining if the measurable goals for the BMPs are met (through annual reports) as well as by implementing the BMPs in accordance with applicable recommendations as identified on USEPA's National Menu of Stormwater Best Management Practices. Each identified responsible position is to provide the respective information for Annual

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Reports to the Assistant City Engineer in the Civil Division of the City Engineering Department by no later than February 15th, annually. Ideally, the success of the City's SWMP may be evaluated based on the results of field monitoring in the Nimishillen Creek and/or other indicators. Each BMP listed below describes an associated measurable goal or goals. The goals were selected based on some practical and/or quantifiable (if possible) aspect of their implementation and the ease of measuring such aspect which provides simple indication of whether the BMP is successfully implemented.

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PERFORMANCE STANDARDS:

Permit Part III.B.4.c.: [City of Canton's] construction site storm water control program shall include pre-construction storm water pollution prevention plan review of all projects from construction activities that result in a land disturbance of greater than or equal to one acre. To ensure compliance, these applicable sites shall be initially inspected. The frequency of follow-up inspections shall be on a monthly basis unless [City of Canton] documents procedures for prioritizing inspections such as location to waterway, amount of disturbed area, compliance of site, etc. [Since the City of Canton] initially had coverage under a previous version of this permit, [City of Canton] shall revise [its] program to satisfy these performance standards, if needed, within two years of when coverage under the current general permit was granted [6/4/09].

ANNUAL REPORTING:

Permit Part III.B.4.d.: Annual Reports shall document the following: (1) number of applicable sites in jurisdiction, (2) number of pre-construction storm water pollution prevention plan reviews performed, (3) number and frequency of site inspections, (4) number of violation letters issued, (5) number of enforcement actions taken, and (6) number of complaints received and number followed up on.

Table 4

Minimum Control Measure (MCM)#4: Construction Site Storm Water Runoff Control

MCM#4 DEPARTMENTAL INVOLVEMENT

Summary of Departments/Responsible Positions with Considerable Involvement in MCM#4 and Associated Best Management Practices (BMPs)

Overall Authority	Department	Division	Responsible Position ¹	BMP #s ²	Total BMPs in MCM#4
Mayor	Mayor's Administration		Mayor	Not applicable	0
Mayor	Mayor's Administration		Management Assistant	Not applicable	0
Mayor	Mayor's Administration		Service Director	Not applicable	0
Service Director	Building Maintenance		Supervisor	Not applicable	0
Service Director	Civic Center		Manager	Not applicable	0
Service Director	Collection Systems		Superintendent	Not applicable	0
Service Director	Development		Director	Not applicable	0
Service Director	Division of Motor Vehicles		Superintendent	Not applicable	0
Service Director	Sanitation		Superintendent	Not applicable	0
Service Director	Street		Superintendent	Not applicable	0
Service Director	Water		Superintendent	Not applicable	0
Service Director	Water Reclamation Facility		Superintendent	Not applicable	0
Service Director	Engineering		City Engineer	1, 2	2
City Engineer	Engineering	Civil	Assistant City Engineer	Not applicable	0
City Engineer	Engineering	Traffic	Assistant City Engineer	Not applicable	0
Mayor	Mayor's Administration		Safety Director	Not applicable	0
Safety Director	Building	Zoning	Zoning Inspector	Not applicable	0
Safety Director	Fire		Chief	Not applicable	0
Safety Director	Police	Impound	Lieutenant	Not applicable	0
Board of Health	Health	Environmental Health	Environmental Health Director	Not applicable	0
Judges	Judges	Community Service	Community Service Director	Not applicable	0
Park Commission	Park		Director	Not applicable	0
Joint Recreation District	Recreation		Director	Not applicable	0
Stark County	SWCD		Urban Resource Coordinator	3, 4, 5	3

Footnotes:

1 – See Table B for Responsible Position contact information

2 – Refer to identified BMPs within this Minimum Control Measure section of the Storm Water Management Program for details

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Minimum Control Measure (MCM) #4: Construction Site Storm Water Runoff Control

“Construction Site Storm Water Runoff Control Program”: Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

1. **BMP#:** 1
2. **Permit Requirement:** Ordinance or other regulatory mechanism requiring construction site erosion, sediment, and waste controls
3. **BMP Name (Permit Part III.A.1.a.):** Storm water management ordinance
4. **BMP Description (Permit Part III.A.1.a.):** In 2009 the City adopted a "Storm Water Management" ordinance (Chapter 961 of Part Nine - Streets, Utilities, and Public Services Code) which is intended to consolidate provisions within existing ordinances and satisfy permit requirements that were are not addressed by existing City ordinances. A "City of Canton Storm Water Management Manual" was adopted as part of the ordinance and includes provisions for the required construction site storm water runoff quality controls for applicable sites. The ordinance requires, at a minimum, the minimum requirements of Ohio EPA's General Storm Water Permit for Construction Activities: OHC000003 as well as requirements in the Stark SWCD's Storm Water Quality Regulations. Appropriate sanctions to ensure compliance are also provided. Refer to Chapter 961 "Storm Water Management" ordinance and the "City of Canton Storm Water Management Manual" for further details.
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** Required per Part III.B.4.a.i.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Engineering Department/City Engineer
8. **Agreement Needed for Implementation (Permit Part III.C.)?** No
9. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):**
 - a. Continue to use ordinance to require construction site storm water runoff quality controls on applicable sites
 - b. Ensure ordinance meets minimum requirements of current applicable NPDES permits
10. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
11. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.4.d.):**
 - a. Indication if respective controls are required by ordinance
 - b. Indication if ordinance is in conformance with current applicable NPDES permits; summary of any relevant revisions to ordinance
12. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):** List and supporting documentation, as applicable
13. **For Further BMP Guidance:** Refer to "Local Ordinances for Construction Site Runoff Control" (under USEPA MCM#4: Construction Site Stormwater Runoff Control) on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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Minimum Control Measure (MCM) #4: Construction Site Storm Water Runoff Control

“Construction Site Storm Water Runoff Control Program”: Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

1. **BMP#:** 2
2. **Permit Requirement:** Requirements for construction site erosion, sediment, and waste control
3. **BMP Name (Permit Part III.A.1.a.):** Construction site storm water runoff quality controls
4. **BMP Description (Permit Part III.A.1.a.):** As described in the "Storm water management ordinance" BMP, the "City of Canton Storm Water Management Manual" requires, at a minimum, the minimum requirements of Ohio EPA's General Storm Water Permit for Construction Activities: OHC000003 for construction site storm water runoff quality controls, including erosion, sediment, and waste control. These requirements are to be applicable to sites in which there is proposed to be 1 acre or more of land disturbance as well as to sites in which there is proposed to be less than 1 acre of land disturbance but part of a larger common plan of development that will disturb 1 acre or more of land. Refer to Chapter 961 "Storm Water Management" ordinance and the "City of Canton Storm Water Management Manual" for further details.
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** Required per Part III.B.4.a.ii-iii.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Engineering Department/City Engineer
8. **Agreement Needed for Implementation (Permit Part III.C.)?** No
9. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):** Ensure construction site erosion, sediment, and waste controls are implemented in accordance with current applicable NPDES permits
10. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
11. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.4.d.):** Indication if construction site erosion, sediment, and waste controls are implemented in accordance with current applicable NPDES permits
12. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):** Copy of current ordinance
13. **For Further BMP Guidance:** Refer to all Construction Site Stormwater Runoff Control BMPs and resources (under USEPA MCM#4: Construction Site Stormwater Runoff Control) on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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Minimum Control Measure (MCM) #4: Construction Site Storm Water Runoff Control**“Construction Site Storm Water Runoff Control Program”: Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements**

1. **BMP#:** 3
2. **Permit Requirement:** Procedures for Storm Water Pollution Prevention Plan (SWP3) review which incorporate consideration of potential water quality impacts
3. **BMP Name (Permit Part III.A.1.a.):** SWP3 reviews
4. **BMP Description (Permit Part III.A.1.a.):** Since 2007, the City and Stark SWCD have an active Memorandum of Understanding (MOU) which describes the role of Stark SWCD in reviewing applicable sites for compliance with Ohio EPA's General Storm Water Permit for Construction Activities: OHC000003 and Stark SWCD's Storm Water Quality Regulations. This includes reviewing plans for storm water quality management of both construction site runoff and post-construction runoff. As such, no applicable site plan is approved without SWP3s being first approved by Stark SWCD. Refer to Chapter 961 "Storm Water Management" ordinance and the "City of Canton Storm Water Management Manual" for further details.
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** Required per Part III.B.4.a.iv.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Stark SWCD/Urban Resource Coordinator
8. **Agreement Needed for Implementation (Permit Part III.C.)?** Yes
9. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):**
 - a. Renew MOU between City and Stark SWCD annually
 - b. Ensure SWP3s are developed and submitted for applicable sites
 - c. Continue to utilize Stark SWCD to review applicable SWP3s
10. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
11. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.4.d.):**
 - a. Indication of MOU renewal
 - b. Indication if SWP3s are developed and submitted for applicable sites
 - c. # of applicable sites in jurisdiction; # of SWP3s reviewed
12. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):**
 - a. Copy of MOU and payment verification
 - b. SWP3 review files and supporting documentation, as applicable
 - c. SWP3 review files and supporting documentation, as applicable
13. **For Further BMP Guidance:** Refer to "Construction Phase Plan Review" BMP (under USEPA MCM#4: Construction Site Stormwater Runoff Control) on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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Minimum Control Measure (MCM) #4: Construction Site Storm Water Runoff Control**“Construction Site Storm Water Runoff Control Program”: Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements**

1. **BMP#:** 4
2. **Permit Requirement:** Procedures for receipt and consideration of information submitted by public
3. **BMP Name (Permit Part III.A.1.a.):** Procedures for receipt and consideration of information submitted by public
4. **BMP Description (Permit Part III.A.1.a.):** The public is welcomed to attend regular City Council meetings, contact the City Building Department, any other department, or the Stark SWCD (330-830-7700 ext. 5) as necessary to relay questions and concerns about current or proposed construction activities within the City. The City does its best to answer questions and consider information submitted by the public. Since 2007, the City and Stark SWCD have an active Memorandum of Understanding (MOU) which describes the role of Stark SWCD in addressing public complaints pertaining to MCM 4 & 5 by site investigation, letter, or phone call. Most of the information submitted by the public relating to construction activities is in regards to construction complaints, so the Stark SWCD is typically the entity that is involved in addressing the respective information. If Stark SWCD is unable to address the issue, the appropriate City representative becomes involved.
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** Required per Part III.B.4.a.v.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Stark SWCD/Urban Resource Coordinator
8. **Agreement Needed for Implementation (Permit Part III.C.)?** Yes
9. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):**
 - a. Renew MOU between City and Stark SWCD annually
 - b. Continue to receive and consider information submitted by public, as applicable
 - c. Continue to investigate and follow-up on applicable construction activity complaints
10. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
11. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.4.d.):**
 - a. Indication of MOU renewal
 - b. # of construction activity complaints received
 - c. # of construction activity complaints followed-up on
12. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):**
 - a. Copy of MOU and payment verification
 - b. Supporting documentation describing date, location, issue, actions taken, etc., as applicable
 - c. Supporting documentation describing date, location, issue, actions taken, etc., as applicable
13. **For Further BMP Guidance:** Refer to "Municipal Construction Inspection Program" BMP (under USEPA MCM#4: Construction Site Stormwater Runoff Control) on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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Minimum Control Measure (MCM) #4: Construction Site Storm Water Runoff Control**“Construction Site Storm Water Runoff Control Program”: Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements**

1. **BMP#:** 5
2. **Permit Requirement:** Procedures for site inspection and enforcement of control measures
3. **BMP Name (Permit Part III.A.1.a.):** Construction site inspections and enforcement
4. **BMP Description (Permit Part III.A.1.a.):** Since 2007, the City and Stark SWCD have an active Memorandum of Understanding (MOU) which describes the role of Stark SWCD in regularly inspecting all applicable sites for implementation of appropriate construction site and post-construction storm water quality BMPs as well as sending copies of all inspection reports to the City of Canton and reporting all non-compliant sites for appropriate enforcement actions by the City via Chapter 961 "Storm Water Management" of the City Codified Ordinances. All applicable activities are considered priorities until a Notice Of Termination is filed with Ohio EPA and therefore all such sites are inspected regularly. Chapter 961 contains all necessary inspection, enforcement, and penalty provisions necessary to satisfy the permit requirements. Refer to Chapter 961 "Storm Water Management" ordinance and the "City of Canton Storm Water Management Manual" for further details.
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** Required per Part III.B.4.a.vi.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Stark SWCD/Urban Resource Coordinator
8. **Agreement Needed for Implementation (Permit Part III.C.)?** Yes
9. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):**
 - a. Renew MOU between City and Stark SWCD annually
 - b. Continue to inspect applicable construction sites
 - c. Notify City of Canton for enforcement of violations, as applicable
10. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
11. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.4.d.):**
 - a. Indication of MOU renewal
 - b. # and frequency of site inspections
 - c. # of violation letters issued and corresponding status
12. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):**
 - a. Copy of MOU and payment verification
 - b. Copies of site inspection letters
 - c. Copies of notifications to City, as applicable
13. **For Further BMP Guidance:** Refer to "Municipal Construction Inspection Program" and "Local Ordinances for Construction Site Runoff Control" BMPs and resources (under USEPA MCM#4: Construction Site Stormwater Runoff Control) on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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5 Minimum Control Measure (MCM) #5: Post-Construction Storm Water Management in New Development and Redevelopment

“Post-Construction Storm Water Management Program (SWMP)”: Overview

MCM PERMIT REQUIREMENTS:

Permit Part III.B.5.a.: [City of Canton] shall develop, implement, and enforce a program to address storm water runoff from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale, that discharge into its MS4. [City of Canton's] program shall ensure that controls are in place that will prevent or minimize water quality impacts;

Permit Part III.B.5.b.: [City of Canton] shall develop and implement strategies which include a combination of structural and/or non-structural BMPs appropriate for [City of Canton].

Permit Part III.B.5.c.: [City of Canton] shall use an ordinance or other regulatory mechanism to address post-construction runoff from new development and redevelopment projects to the extent allowable under State or local law. [City of Canton's] ordinance or other regulatory mechanism shall, at a minimum, be equivalent with the technical requirements set forth in the Ohio EPA NPDES General Storm Water Permit(s) for Construction Activities applicable for [City of Canton] permit area which have been issued at the time of issuance of this permit. This would include the following Ohio EPA NPDES General Storm Water Permits for Construction Activities: OHC000003, OHCD00001, and OHCO00001. [Since City of Canton] initially had coverage under a previous version of this permit, [City of Canton] shall revise [its] ordinance or other regulatory mechanism, if needed, within two years of when [City of Canton's] coverage under this general permit was granted [6/4/09].

Permit Part III.B.5.d.: [City of Canton] shall ensure adequate long-term operation and maintenance of BMPs.

DECISION PROCESS (RATIONALE STATEMENT) FOR DEVELOPMENT OF POST-CONSTRUCTION SWMP:

Permit Part III.B.5.e.: [City of Canton] shall document [its] decision process for the development of a post-construction SWMP. [City of Canton's] rationale statement shall address both [its] overall post-construction SWMP and the individual BMPs, measurable goals, and responsible persons for [City of Canton's] program.

Response: The City of Canton supports EPA's assessment that post-construction stormwater management in areas undergoing new development or redevelopment is necessary because runoff from these areas has been shown to significantly affect receiving waterbodies. See USEPA's Stormwater Phase II Final Rule Fact Sheet Series at <http://cfpub.epa.gov/npdes/stormwater/swfinal.cfm> for further information on the NPDES Phase II Small MS4 Storm Water Program and the associated Minimum Control Measures.

The City of Canton is to implement the BMPs described below as part of its Post-Construction Storm Water Management Program to reduce pollutants in post-construction runoff to its MS4 from new development and redevelopment projects that result in land disturbances of greater than or equal to one acre. The identified BMPs are those that the City believes are needed to meet permit requirements and/or expectations. See "Post-Construction Stormwater Management in New Development and Redevelopment" on USEPA's National Menu of Stormwater Best Management Practices at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/> for further BMP guidance and information.

Permit Part III.B.5.e.: The rationale statement shall include the following information, at a minimum:

Permit Part III.B.5.e.i.: [City of Canton's] program to address storm water runoff from new development and redevelopment projects. Include in this description any specific priority areas for this program.

Response: The City of Canton is to implement the requirements of this MCM so that both the post-construction quantity and quality of storm water runoff from new development and redevelopment projects is appropriately managed. Post-construction storm water quality management is to apply to all sites disturbing 1 acre or more while post-construction storm water quantity management is to be evaluated and applied accordingly to all sites requiring the submission of a site plan per the Planning and Zoning Code. Detailed standards, specifications, and requirements for post-construction storm water quantity and quality management are to be provided via "Storm water management ordinance" BMP below.

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Permit Part III.B.5.e.ii.: How [City of Canton's] program will be specifically tailored for [City of Canton's] local community, minimize water quality impacts, and attempt to maintain pre-development runoff conditions.

Response: Until further regulation is mandated by the EPA requiring specific BMPs or controls for specific pollutants, the City of Canton believes that by implementing the requirements of this MCM, the City's program is tailored for the local community. Through the use of applicable local master plans, comprehensive plans, zoning ordinances, the involvement of the Stark SWCD in plan review and site inspections, local storm water management requirements, requirements of the Ohio EPA's General Storm Water Permit for Construction Activities: OHC000003, and discretion by City and SWCD staff for non-standard circumstances, improved post-construction water quality is promoted in many ways thus attempting to minimize water quality impacts and maintain pre-development runoff conditions.

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Permit Part III.B.5.e.iii.: Any non-structural BMPs in [City of Canton's] program, including, as appropriate: policies and ordinances that provide requirements and standards to direct growth to identified areas, protect sensitive areas such as wetlands and riparian areas, maintain and/or increase open space (including a dedicated funding source for open space acquisition), provide buffers along sensitive water bodies, minimize impervious surfaces, and minimize disturbance of soils and vegetation; policies or ordinances that encourage infill development in higher density urban areas, and areas with existing storm sewer infrastructure; education programs for developers and the public about project designs that minimize water quality impacts; and other measures such as minimization of the percentage of impervious area after development, use of measures to minimize directly connected impervious areas, and source control measures often thought of as good housekeeping, preventative maintenance, and spill prevention.

Response: The City of Canton implements various non-structural BMPs that meet the above descriptions. See all non-structural BMPs and strategies below for further details.

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Permit Part III.B.5.e.iv.: Any structural BMPs in [City of Canton's] program, including, as appropriate: storage practices such as wet ponds and extended-detention outlet structures; filtration practices such as grassed swales, bioretention cells, sand filters, and filter strips; and infiltration practices such as infiltration basins and infiltration trenches.

Response: The "City of Canton Storm Water Management Manual" (part of the City's "Storm Water Management" ordinance) contains provisions for structural BMPs in accordance with requirements of the Ohio EPA's General Storm Water Permit for Construction Activities: OHC000003 at a minimum and supports the use of any such practices as long as they are approved for use by Ohio EPA. See all structural BMPs and strategies below for further details.

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Permit Part III.B.5.e.v.: The mechanism (ordinance or other regulatory mechanisms) [City of Canton] will use to address post-construction runoff from new developments and redevelopments and why [City of Canton] chose the mechanism(s). If [City of Canton] needs to develop a mechanism, describe in [City of Canton's] plan and a schedule to do so. If [City of Canton's] ordinance or regulatory mechanism is already developed, include a copy of the relevant sections with [City of Canton's] program.

Response: The City of Canton is to utilize an ordinance as the regulatory mechanism to address post-construction runoff from new developments and redevelopments. Ordinances are the typical legislative mechanisms for cities to utilize to formally adopt and meet state and federal regulations and to establish local law. Prior to 2009, older City ordinances were used to satisfy the regulatory intent of this minimum control measure. In 2009, a new storm water management ordinance was adopted. See "Storm water management ordinance" BMP below for further details.

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Permit Part III.B.5.e.vi.: How [City of Canton] will ensure long-term operation and maintenance (O&M) of [its] selected BMPs. Options to help ensure that future O&M responsibilities are clearly identified include an agreement between [City of Canton] and another party such as the post-development landowners or regional authorities.

Response: The City of Canton is to require Long Term Maintenance Plans to be developed for applicable post-construction BMPs and ensure easement requirements and inspection and enforcement provisions are provided within its "Storm Water Management" ordinance to help ensure that long-term operation and maintenance occurs as appropriate. See "Long Term Maintenance Plans" BMP below for further details.

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Permit Part III.B.5.e.vii.: Who is responsible for overall management and implementation of [City of Canton's] post-construction SWMP and, if different, who is responsible for each of the BMPs identified for this program.

Response: Even though the Assistant City Engineer in the Civil Division of the Engineering Department is the primary contact for the SWMP and responsible for preparing annual reports, the Service Director is responsible for the overall management and implementation of the City of Canton's post-construction SWMP. However, each BMP listed below identifies the particular City department or entity and position primarily responsible for the implementation of the respective BMP. Depending on the nature of the BMP, some may list more than one responsible position. Each responsible position is to maintain all records of supporting information for respective BMP implementation.

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Permit Part III.B.5.e.viii.: How [City of Canton's] program will evaluate the success of this minimum measure, including how [City of Canton] selected the measurable goals for each of the BMPs.

Response: In time, the City of Canton is to measure the success of this MCM by determining if the measurable goals for the BMPs are met (through annual reports) as well as by implementing the BMPs in accordance with applicable recommendations as identified on USEPA's National Menu of Stormwater Best Management Practices. Each identified responsible position is to provide the respective information for Annual Reports to the Assistant City Engineer in the Civil Division of the City Engineering Department by no later than

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February 15th, annually. Ideally, the success of the City's SWMP may be evaluated based on the results of field monitoring in the Nimishillen Creek and/or other indicators. Each BMP listed below describes an associated measurable goal or goals. The goals were selected based on some practical and/or quantifiable (if possible) aspect of their implementation and the ease of measuring such aspect which provides simple indication of whether the BMP is successfully implemented.

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PERFORMANCE STANDARDS:

Permit Part III.B.5.f.: [City of Canton's] post-construction SWMP shall include pre-construction storm water pollution prevention plan reviews of all projects from construction activities that result in a land disturbance of greater than or equal to one acre to ensure that required controls are designed per requirements. These applicable sites shall be inspected to ensure that controls are installed per requirements. [City of Canton's] post-construction SWMP shall also ensure that long-term operation and maintenance (O&M) plans are developed and agreements are in place for all applicable sites. [Since the City of Canton] initially had coverage under a previous version of this permit, [City of Canton] shall revise [its] program satisfy these performance standards, if needed, within two years of when [City of Canton's] coverage under the current general permit was granted [6/4/09].

ANNUAL REPORTING:

Permit Part III.B.5.g.: Annual Reports shall document the following: (1) number of applicable sites in jurisdiction requiring post-construction controls, (2) number of pre-construction storm water pollution prevention plan reviews performed, (3) number of inspections performed to ensure post-construction practices were built as per requirements, and (4) number of long-term operation and maintenance (O&M) plans developed and agreements in place.

Table 5

Minimum Control Measure (MCM)#5: Post-Construction Storm Water Management in New Development and Redevelopment

MCM#5 DEPARTMENTAL INVOLVEMENT

Summary of Departments/Responsible Positions with Considerable Involvement in MCM#5 and Associated Best Management Practices (BMPs)

Overall Authority	Department	Division	Responsible Position ¹	BMP #s ²	Total BMPs in MCM#5
Mayor	Mayor's Administration		Mayor	Not applicable	0
Mayor	Mayor's Administration		Management Assistant	Not applicable	0
Mayor	Mayor's Administration		Service Director	Not applicable	0
Service Director	Building Maintenance		Supervisor	Not applicable	0
Service Director	Civic Center		Manager	Not applicable	0
Service Director	Collection Systems		Superintendent	Not applicable	0
Service Director	Development		Director	4, 6	2
Service Director	Division of Motor Vehicles		Superintendent	Not applicable	0
Service Director	Sanitation		Superintendent	Not applicable	0
Service Director	Street		Superintendent	Not applicable	0
Service Director	Water		Superintendent	Not applicable	0
Service Director	Water Reclamation Facility		Superintendent	Not applicable	0
Service Director	Engineering		City Engineer	1, 5, 9, 10, 11, 12	6
City Engineer	Engineering	Civil	Assistant City Engineer	Not applicable	0
City Engineer	Engineering	Traffic	Assistant City Engineer	Not applicable	0
Mayor	Mayor's Administration		Safety Director	Not applicable	0
Safety Director	Building	Zoning	Zoning Inspector	2, 8	2
Safety Director	Fire		Chief	Not applicable	0
Safety Director	Police	Impound	Lieutenant	Not applicable	0
Board of Health	Health	Environmental Health	Environmental Health Director	Not applicable	0
Judges	Judges	Community Service	Community Service Director	Not applicable	0
Park Commission	Park		Director	3	1
Joint Recreation District	Recreation		Director	Not applicable	0
Stark County	SWCD		Urban Resource Coordinator	13, 14, 15	3

Footnotes:

1 – See Table B for Responsible Position contact information

2 – Refer to identified BMPs within this Minimum Control Measure section of the Storm Water Management Program for details

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Minimum Control Measure (MCM) #5: Post-Construction Storm Water Management in New Development and Redevelopment

“Post-Construction Storm Water Management Program (SWMP)”: Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

1. **BMP#:** 1
2. **Permit Requirement:** Ordinance or Other Regulatory Mechanism Requiring Controls for Post-Construction Runoff from New Development and Redevelopment
3. **BMP Name (Permit Part III.A.1.a.):** Storm water management ordinance
4. **BMP Description (Permit Part III.A.1.a.):** In 2009 the City adopted a "Storm Water Management" ordinance (Chapter 961 of Part Nine - Streets, Utilities, and Public Services Code) which is intended to consolidate provisions within existing ordinances and satisfy permit requirements that were not addressed by existing City ordinances. A "City of Canton Storm Water Management Manual" was adopted as part of the ordinance and includes provisions for the required controls for post-construction runoff from applicable new development and redevelopment sites. The ordinance requires, at a minimum, the minimum requirements of Ohio EPA's General Storm Water Permit for Construction Activities: OHC000003 as well as requirements in the Stark SWCD's Storm Water Quality Regulations. Appropriate sanctions to ensure compliance are also provided. Refer to Chapter 961 "Storm Water Management" ordinance and the "City of Canton Storm Water Management Manual" for further details.
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** Required per Part III.B.5.c.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Engineering Department/City Engineer
8. **Agreement Needed for Implementation (Permit Part III.C.)?** No
9. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):**
 - a. Continue to use ordinance to require construction site storm water runoff quality controls on applicable sites
 - b. Ensure ordinance meets minimum requirements of current applicable NPDES permits
10. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
11. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.5.g.):**
 - a. Indication if respective controls are required by ordinance
 - b. Indication if ordinance is in conformance with current applicable NPDES permits; summary of any relevant revisions to ordinance
12. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):**
 - a. Copy of current ordinance
 - b. Supporting documentation, as necessary
13. **For Further BMP Guidance:** Refer to "Ordinances for Post-Construction Runoff" BMP (under USEPA MCM#5: Post-Construction Stormwater Management in New Development and Redevelopment) on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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**Minimum Control Measure (MCM) #5: Post-Construction Storm Water Management in New
Development and Redevelopment**

**“Post-Construction Storm Water Management Program (SWMP)”: Best Management
Practices (BMPs)/Requirements used to Satisfy MCM Requirements**

1. **BMP#:** 2
2. **Permit Requirement:** Non-Structural BMPs and Strategies: As applicable, any policies and ordinances that provide requirements and standards to direct growth to identified areas, protect sensitive areas such as wetlands and riparian areas, maintain and/or increase open space (including a dedicated funding source for open space acquisition), provide buffers along sensitive water bodies, minimize impervious surfaces, and minimize disturbance of soils and vegetation: Policies and ordinances
3. **BMP Name (Permit Part III.A.1.a.):** Zoning ordinances
4. **BMP Description (Permit Part III.A.1.a.):** The City's Planning & Zoning Code regulates development within all areas of the City in accordance with respective zone classifications. Chapter 1132 regulates the "Flood Hazard District" which generally restricts development adjacent to certain water bodies within the City. Chapter 1133 regulates the "Open Space District" which reserves such areas for public parks and recreation, and promotes the conservation of natural resources including land and water conservation and wildlife refuges, and agricultural areas. Other chapters regulate residential, business, and industrial districts, with certain requirements for building setbacks, maximum % of lot coverage, and minimum % of lot landscaping, as applicable. Chapter 1143 regulates "Planned Unit Development Districts", promoting "low impact development" philosophy such as the preservation and utilization of natural topography, geologic features, scenic vistas, green areas, requiring open spaces, minimizing impervious areas, preventing the disruption of natural drainage patterns, etc.
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** BMP assists in satisfying Part III.B.5.e.iii.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Building (Zoning) Department/Zoning Inspector
8. **Agreement Needed for Implementation (Permit Part III.C.)?** No
9. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):**
 - a. Continue to regulate "non-structural" measures as described through zoning ordinances
 - b. Investigate the implementation of additional related "non-structural" measures, as applicable
10. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
11. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.5.g.):**
 - a. Indication if described "non-structural" measures continue to be regulated
 - b. Progress/status of implementation of any additional related "non-structural" measures
12. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):**
 - a. Copy of current ordinances
 - b. Supporting documentation, as applicable
13. **For Further BMP Guidance:** Refer to "Ordinances for Post-Construction Runoff", "Development Districts" and other BMPs and resources (under USEPA MCM#5: Post-Construction Stormwater Management in New Development and Redevelopment) on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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Minimum Control Measure (MCM) #5: Post-Construction Storm Water Management in New Development and Redevelopment

“Post-Construction Storm Water Management Program (SWMP)”: Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

1. **BMP#:** 3
2. **Permit Requirement:** Non-Structural BMPs and Strategies: As applicable, any policies and ordinances that provide requirements and standards to direct growth to identified areas, protect sensitive areas such as wetlands and riparian areas, maintain and/or increase open space (including a dedicated funding source for open space acquisition), provide buffers along sensitive water bodies, minimize impervious surfaces, and minimize disturbance of soils and vegetation: Funding sources for open space acquisitions
3. **BMP Name (Permit Part III.A.1.a.):** Parks Department funding
4. **BMP Description (Permit Part III.A.1.a.):** The City does not have a specific "dedicated funding source for open space acquisition". However, the City of Canton funds a Parks Department. The mission statement of the Canton Board of Park Commissioners states that the Board "is committed to maintaining and conserving diverse park, recreation, and open space opportunities by providing safe, adaptable, and environmentally conscious park areas". The Parks Department's natural function is to ensure that all City-owned properties under the responsibility of the Parks Department are in conformance with the mission statement. As funds and opportunities allow, open spaces can be acquired by the Park Board and developed or preserved as parks or other similar land use designations. Additional information can be found on the City's website at www.cantonohio.gov/parks.
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** BMP assists in satisfying Part III.B.5.e.iii.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Parks Department/Director
8. **Agreement Needed for Implementation (Permit Part III.C.)?** No
9. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):** Investigate opportunities to acquire open spaces and develop or preserve as parks or other similar land use designations
10. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
11. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.5.g.):** Progress/status of any open space acquisitions or preservation
12. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):** Supporting documentation, as applicable
13. **For Further BMP Guidance:** Refer to "Protection of Natural Features", "Open Space Design", and other BMPs (under USEPA MCM#5: Post-Construction Stormwater Management in New Development and Redevelopment) on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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**Minimum Control Measure (MCM) #5: Post-Construction Storm Water Management in New
Development and Redevelopment**

**“Post-Construction Storm Water Management Program (SWMP)”: Best Management
Practices (BMPs)/Requirements used to Satisfy MCM Requirements**

1. **BMP#:** 4
2. **Permit Requirement:** Non-Structural BMPs and Strategies: As applicable, any policies and ordinances that provide requirements and standards to direct growth to identified areas, protect sensitive areas such as wetlands and riparian areas, maintain and/or increase open space (including a dedicated funding source for open space acquisition), provide buffers along sensitive water bodies, minimize impervious surfaces, and minimize disturbance of soils and vegetation: Funding sources for open space acquisitions
3. **BMP Name (Permit Part III.A.1.a.):** Community Development Block Grants
4. **BMP Description (Permit Part III.A.1.a.):** The City does not have a specific "dedicated funding source for open space acquisition". However, the City Development Department administers Community Development Block Grant (CDBG) funds. These funds are provided annually through federal programs and are intended to be used to serve low and moderate income areas within the City. Certain criteria must be met to utilize CDBG funds. Each CDBG funding opportunity is evaluated case-by-case. It is possible that certain CDBG funded projects may provide for the acquisition and preservation of open spaces and green spaces or for the acquisition and development of open spaces into active recreation areas. Additional information can be found on the City's website at www.cantonohio.gov/development or by contacting the Development Department at 330-489-3344.
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** BMP assists in satisfying Part III.B.5.e.iii.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Development Department/Director
8. **Agreement Needed for Implementation (Permit Part III.C.)?** No
9. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):** Investigate opportunities to utilize CDBG funds to acquire and preserve open spaces or develop them into recreational areas, as applicable
10. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
11. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.5.g.):** Progress/status of utilizing CDBG funds to acquire and preserve open spaces or develop them into recreational areas, as applicable
12. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):** Supporting documentation, as applicable
13. **For Further BMP Guidance:** Refer to "Protection of Natural Features", "Open Space Design", and other BMPs (under USEPA MCM#5: Post-Construction Stormwater Management in New Development and Redevelopment) on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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**Minimum Control Measure (MCM) #5: Post-Construction Storm Water Management in New
Development and Redevelopment**

**“Post-Construction Storm Water Management Program (SWMP)”: Best Management
Practices (BMPs)/Requirements used to Satisfy MCM Requirements**

1. **BMP#:** 5
2. **Permit Requirement:** Non-Structural BMPs and Strategies: As applicable, any policies and ordinances that provide requirements and standards to direct growth to identified areas, protect sensitive areas such as wetlands and riparian areas, maintain and/or increase open space (including a dedicated funding source for open space acquisition), provide buffers along sensitive water bodies, minimize impervious surfaces, and minimize disturbance of soils and vegetation: Funding sources for open space acquisitions
3. **BMP Name (Permit Part III.A.1.a.):** Clean Ohio Green Space Conservation Program, etc.
4. **BMP Description (Permit Part III.A.1.a.):** The City does not have a specific "dedicated funding source for open space acquisition". However, funding opportunities from sources such as the Clean Ohio Green Space Conservation Program help to fund the preservation of open spaces, sensitive ecological areas, and stream corridors. Among other purposes, the Clean Ohio Green Space Conservation Program provides Clean Ohio Funds to projects that specifically: preserve streamside forests, natural stream channels, functioning floodplains, and other natural features of Ohio's waterways; support comprehensive open space planning; secure easements to protect stream corridors, etc. Additional information can be found on the Clean Ohio Fund website at www.clean.ohio.gov/GreenSpaceConservation. When appropriate, the City applies for and sometimes is awarded Clean Ohio Funds and/or other funds/grants for various projects and different applications. The City of Canton has utilized and hopes to continue to utilize these types of funds for such purposes.
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** BMP assists in satisfying Part III.B.5.e.iii.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Engineering Department/City Engineer
8. **Agreement Needed for Implementation (Permit Part III.C.)?** No
9. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):** Investigate opportunities to utilize Clean Ohio Funds, etc. to acquire and preserve open spaces or develop them into recreational areas, as applicable
10. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
11. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.5.g.):** Progress/status of utilizing Clean Ohio Funds to acquire and preserve open spaces or develop them into recreational areas, as applicable
12. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):** Supporting documentation, as applicable
13. **For Further BMP Guidance:** Refer to "Protection of Natural Features", "Open Space Design", and other BMPs (under USEPA MCM#5: Post-Construction Stormwater Management in New Development and Redevelopment) on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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**Minimum Control Measure (MCM) #5: Post-Construction Storm Water Management in New
Development and Redevelopment**

**“Post-Construction Storm Water Management Program (SWMP)”: Best Management
Practices (BMPs)/Requirements used to Satisfy MCM Requirements**

1. **BMP#:** 6
2. **Permit Requirement:** Non-Structural BMPs and Strategies: As applicable, any policies or ordinances that encourage infill development in higher density urban areas and areas with existing storm sewer infrastructure
3. **BMP Name (Permit Part III.A.1.a.):** Infill residential development ordinance
4. **BMP Description (Permit Part III.A.1.a.):** In 2005, the Canton City Planning Commission initiated an amendment to the Canton City Zoning Ordinance (Ordinance #217-2005) which allows for infill residential development. The ordinance provides that lots created prior to 1979 and held in separate ownership from adjoining and/or abutting property and less than the required lot area and width requirements of the applicable zoning district shall be deemed buildable lots if all of the following apply: the lot frontage is not less than 45 feet; the total area of the lot is not less than 4,500 square feet; and over 65% of the properties within 300 feet of the same street frontage of the lot are the same or less than the lot in question and are developed with a permitted residential structure. Any lot not meeting current zoning requirements for the district in which it is located and not meeting the requirements of the ordinance are deemed non-buildable unless granted a variance by the Board of Zoning Appeals. Most City streets serving higher density urban areas have existing storm sewers.
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** BMP assists in satisfying Part III.B.5.e.iii.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Development Department/Director
8. **Agreement Needed for Implementation (Permit Part III.C.)?** No
9. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):** Continue to encourage infill residential development via ordinance
10. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
11. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.5.g.):** Summary of any infill development occurring in accordance with ordinance
12. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):** Supporting documentation summarizing location(s) of applicable infill development, as applicable
13. **For Further BMP Guidance:** Refer to "Low Impact Development (LID) and Other Green Design Strategies", "Development Districts" and other BMPs (under USEPA MCM#5: Post-Construction Stormwater Management in New Development and Redevelopment) on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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Minimum Control Measure (MCM) #5: Post-Construction Storm Water Management in New Development and Redevelopment

“Post-Construction Storm Water Management Program (SWMP)”: Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

1. **BMP#:** 7
2. **Permit Requirement:** Non-Structural BMPs and Strategies: As applicable, any education programs for developers and the public about project designs that minimize water quality impacts
3. **BMP Name (Permit Part III.A.1.a.):** Storm water education for development community
4. **BMP Description (Permit Part III.A.1.a.):** (This requirement is addressed under MCM#1. See "Storm water education for development community" BMP under MCM#1 for details.)
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** BMP assists in satisfying Part III.B.5.e.iii.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** (See BMP Description)
7. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** (See BMP Description)
8. **Agreement Needed for Implementation (Permit Part III.C.)?** (See BMP Description)
9. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):** (See BMP Description)
10. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** (See BMP Description)
11. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.5.g.):** (See BMP Description)
12. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):** (See BMP Description)
13. **For Further BMP Guidance:** (See BMP Description)

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Minimum Control Measure (MCM) #5: Post-Construction Storm Water Management in New Development and Redevelopment

“Post-Construction Storm Water Management Program (SWMP)”: Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

1. **BMP#:** 8
2. **Permit Requirement:** Non-Structural BMPs and Strategies: As applicable, any measures to minimize the percentage of impervious area after development and that minimize directly connected impervious areas
3. **BMP Name (Permit Part III.A.1.a.):** Zoning ordinances
4. **BMP Description (Permit Part III.A.1.a.):** The City's Planning & Zoning Code regulates various aspects of development within all areas of the City in accordance with respective zone classifications. Chapter 1132 regulates the "Flood Hazard District" which generally restricts development adjacent to certain water bodies within the City. Chapter 1133 regulates the "Open Space District" which reserves such areas for public parks and recreation, and promotes the conservation of natural resources including land and water conservation and wildlife refuges, and agricultural areas.

Other chapters regulate residential, business, and industrial districts, with certain requirements for building setbacks, maximum % of lot coverage, and minimum % of lot landscaping, as applicable. Chapter 1143 regulates "Planned Unit Development Districts", promoting "low impact development" philosophy such as the preservation and utilization of natural topography, geologic features, scenic vistas, green areas, requiring open spaces, minimizing impervious areas, preventing the disruption of natural drainage patterns, etc.

5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** BMP assists in satisfying Part III.B.5.e.iii.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Building (Zoning) Department/Zoning Inspector
8. **Agreement Needed for Implementation (Permit Part III.C.)?** No
9. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):**
 - a. Continue to regulate "non-structural" measures as described through zoning ordinances
 - b. Investigate the implementation of additional related "non-structural" measures, as applicable
10. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
11. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.5.g.):**
 - a. Indication if described "non-structural" measures continue to be regulated
 - b. Progress/status of implementation of any additional related "non-structural" measures
12. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):**
 - a. Copy of current ordinances
 - b. Supporting documentation, as applicable
13. **For Further BMP Guidance:** Refer to "Low Impact Development (LID) and Other Green Design Strategies", "Smart Growth", and other BMPs (under USEPA MCM#5: Post-Construction Stormwater Management in New Development and Redevelopment) on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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Minimum Control Measure (MCM) #5: Post-Construction Storm Water Management in New Development and Redevelopment

“Post-Construction Storm Water Management Program (SWMP)”: Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

1. **BMP#:** 9
2. **Permit Requirement:** Non-Structural BMPs and Strategies: As applicable, any source control measures thought of as good housekeeping, preventative maintenance, and spill prevention
3. **BMP Name (Permit Part III.A.1.a.):** Source control measures
4. **BMP Description (Permit Part III.A.1.a.):** The City of Canton believes that such "source control measures" are addressed as necessary by Storm Water Pollution Prevention Plans via the requirements of Ohio EPA's General Storm Water Permit for Construction Activities as well as the required Long Term Maintenance Plans (see "Long Term Maintenance Plans" BMP) on applicable sites. As long as the minimum requirements within Ohio EPA's General Storm Water Permit for Construction Activities are met, such source control measures should be implemented as necessary on applicable sites.
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** BMP assists in satisfying Part III.B.5.e.iii, as applicable
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Engineering Department/City Engineer
8. **Agreement Needed for Implementation (Permit Part III.C.)?** No
9. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):**
 - a. Continue to require adherence to Ohio EPA's General Storm Water Permit for Construction Activities for applicable sites
 - b. Investigate the implementation of additional related "non-structural" measures, as applicable
10. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
11. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.5.g.):**
 - a. Indication of required adherence to respective Ohio EPA Permit for applicable sites
 - b. Progress/status of implementation of any additional related "non-structural" measures
12. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):**
 - a. Copy of ordinance
 - b. Supporting documentation, as applicable
13. **For Further BMP Guidance:** Refer to "BMP Inspection and Maintenance" BMP (under USEPA MCM#5: Post-Construction Stormwater Management in New Development and Redevelopment) on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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Minimum Control Measure (MCM) #5: Post-Construction Storm Water Management in New Development and Redevelopment

“Post-Construction Storm Water Management Program (SWMP)”: Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

1. **BMP#:** 10
2. **Permit Requirement:** Structural BMPs and Strategies: As applicable, any storage practices such as wet ponds and extended-detention outlet structures
3. **BMP Name (Permit Part III.A.1.a.):** Storage practices
4. **BMP Description (Permit Part III.A.1.a.):** Such practices are listed as available options to satisfy post-construction "structural" water quality BMP within Ohio EPA's General Storm Water Permit for Construction Activities. As applicable, the City of Canton requires adherence to Ohio EPA's General Storm Water Permit for Construction Activities: OHC000003 at a minimum and supports the use of any such practices as long as they are approved for use by Ohio EPA. Further explanation, including applicability, planning considerations, design criteria, maintenance, etc. of such practices is provided in the Ohio Department of Natural Resources' Rainwater and Land Development manual. Any related "alternative" practices not listed within Ohio EPA's General Storm Water Permit for Construction Activities must be approved by the City of Canton and/or Ohio EPA.
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** Required per Part III.B.5.e.iv, as applicable.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Engineering Department/City Engineer
8. **Agreement Needed for Implementation (Permit Part III.C.)?** No
9. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):**
 - a. Continue to require adherence to Ohio EPA's General Storm Water Permit for Construction Activities for applicable sites
 - b. Investigate the implementation of additional related "non-structural" measures, as applicable
10. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
11. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.5.g.):**
 - a. Indication of required adherence to respective Ohio EPA Permit for applicable sites
 - b. Progress/status of implementation of any additional related "structural" measures
12. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):**
 - a. Copy of ordinance
 - b. Supporting documentation, as applicable
13. **For Further BMP Guidance:** Refer to "Wet Ponds" and other retention/detention BMPs (under USEPA MCM#5: Post-Construction Stormwater Management in New Development and Redevelopment) on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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Minimum Control Measure (MCM) #5: Post-Construction Storm Water Management in New Development and Redevelopment

“Post-Construction Storm Water Management Program (SWMP)”: Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

1. **BMP#:** 11
2. **Permit Requirement:** Structural BMPs and Strategies: As applicable, any filtration practices such as grassed swales, bioretention cells, sand filters, and filter strips
3. **BMP Name (Permit Part III.A.1.a.):** Filtration practices
4. **BMP Description (Permit Part III.A.1.a.):** Such practices are listed as available options to satisfy post-construction "structural" water quality BMP within Ohio EPA's General Storm Water Permit for Construction Activities. As applicable, the City of Canton requires adherence to Ohio EPA's General Storm Water Permit for Construction Activities: OHC000003 at a minimum and supports the use of any such practices as long as they are approved for use by Ohio EPA. Further explanation, including applicability, planning considerations, design criteria, maintenance, etc. of such practices is provided in the Ohio Department of Natural Resources' Rainwater and Land Development manual. Any related "alternative" practices not listed within Ohio EPA's General Storm Water Permit for Construction Activities must be approved by the City of Canton and/or Ohio EPA.
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** Required per Part III.B.5.e.iv, as applicable.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Engineering Department/City Engineer
8. **Agreement Needed for Implementation (Permit Part III.C.)?** No
9. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):**
 - a. Continue to require adherence to Ohio EPA's General Storm Water Permit for Construction Activities for applicable sites
 - b. Investigate the implementation of additional related "non-structural" measures, as applicable
10. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
11. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.5.g.):**
 - a. Indication of required adherence to respective Ohio EPA Permit for applicable sites
 - b. Progress/status of implementation of any additional related "structural" measures
12. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):**
 - a. Copy of ordinance
 - b. Supporting documentation, as applicable
13. **For Further BMP Guidance:** Refer to "Vegetated Filter Strip" and other filtration BMPs (under USEPA MCM#5: Post-Construction Stormwater Management in New Development and Redevelopment) on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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Minimum Control Measure (MCM) #5: Post-Construction Storm Water Management in New Development and Redevelopment

“Post-Construction Storm Water Management Program (SWMP)”: Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

1. **BMP#:** 12
2. **Permit Requirement:** Structural BMPs and Strategies: As applicable, any infiltration practices such as infiltration basins and infiltration trenches
3. **BMP Name (Permit Part III.A.1.a.):** Infiltration practices
4. **BMP Description (Permit Part III.A.1.a.):** Such practices are listed as available options to satisfy post-construction "structural" water quality BMP within Ohio EPA's General Storm Water Permit for Construction Activities. As applicable, the City of Canton requires adherence to Ohio EPA's General Storm Water Permit for Construction Activities: OHC000003 at a minimum and supports the use of any such practices as long as they are approved for use by Ohio EPA. Further explanation, including applicability, planning considerations, design criteria, maintenance, etc. of such practices is provided in the Ohio Department of Natural Resources' Rainwater and Land Development manual. Any related "alternative" practices not listed within Ohio EPA's General Storm Water Permit for Construction Activities must be approved by the City of Canton and/or Ohio EPA.
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** Required per Part III.B.5.e.iv, as applicable.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Engineering Department/City Engineer
8. **Agreement Needed for Implementation (Permit Part III.C.)?** No
9. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):**
 - a. Continue to require adherence to Ohio EPA's General Storm Water Permit for Construction Activities for applicable sites
 - b. Investigate the implementation of additional related "non-structural" measures, as applicable
10. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
11. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.5.g.):**
 - a. Indication of required adherence to respective Ohio EPA Permit for applicable sites
 - b. Progress/status of implementation of any additional related "structural" measures
12. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):**
 - a. Copy of ordinance
 - b. Supporting documentation, as applicable
13. **For Further BMP Guidance:** Refer to "Infiltration Trench" and other infiltration BMPs (under USEPA MCM#5: Post-Construction Stormwater Management in New Development and Redevelopment) on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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Minimum Control Measure (MCM) #5: Post-Construction Storm Water Management in New Development and Redevelopment

“Post-Construction Storm Water Management Program (SWMP)”: Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

1. **BMP#:** 13
2. **Permit Requirement:** Procedures for Storm Water Pollution Prevention Plan (SWP3) review which incorporate consideration of potential water quality impacts
3. **BMP Name (Permit Part III.A.1.a.):** SWP3 reviews
4. **BMP Description (Permit Part III.A.1.a.):** Since 2007, the City and Stark SWCD have an active Memorandum of Understanding (MOU) which describes the role of Stark SWCD in reviewing applicable sites for compliance with Ohio EPA's General Storm Water Permit for Construction Activities: OHC000003 and Stark SWCD's Storm Water Quality Regulations. This includes reviewing plans for storm water quality management of both construction site runoff and post-construction runoff. As such, no applicable site plan is approved without SWP3s being first approved by Stark SWCD. Refer to Chapter 961 "Storm Water Management" ordinance and the "City of Canton Storm Water Management Manual" for further details.
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** SWP3 review procedures are required per MCM#4. Such procedures also ensure that post-construction controls are designed per requirements for applicable sites.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Stark SWCD/Urban Resource Coordinator
8. **Agreement Needed for Implementation (Permit Part III.C.)?** Yes
9. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):**
 - a. Renew MOU between City and Stark SWCD annually
 - b. Ensure SWP3s are developed and submitted for applicable sites
 - c. Continue to utilize Stark SWCD to review applicable SWP3s
10. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
11. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.5.g.):**
 - a. Indication of MOU renewal
 - b. Indication if SWP3s are developed and submitted for applicable sites
 - c. # of applicable sites in jurisdiction; # of SWP3s reviewed
12. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):**
 - a. Copy of MOU and payment verification
 - b. SWP3 review files and supporting documentation, as applicable
 - c. SWP3 review files and supporting documentation, as applicable
13. **For Further BMP Guidance:** Refer to "Post-Construction Plan Review" BMP (under USEPA MCM#5: Post-Construction Stormwater Management in New Development and Redevelopment) on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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Minimum Control Measure (MCM) #5: Post-Construction Storm Water Management in New Development and Redevelopment

“Post-Construction Storm Water Management Program (SWMP)”: Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

1. **BMP#:** 14
2. **Permit Requirement:** Procedures for site inspection and enforcement of control measures
3. **BMP Name (Permit Part III.A.1.a.):** Construction site inspections and enforcement
4. **BMP Description (Permit Part III.A.1.a.):** Since 2007, the City and Stark SWCD have an active Memorandum of Understanding (MOU) which describes the role of Stark SWCD in inspecting applicable sites for implementation of appropriate construction site and post-construction storm water quality BMPs as well as sending copies of all inspection reports to the City of Canton and reporting all non-compliant sites for appropriate enforcement actions by the City (via the Planning and Zoning Code and/or other ordinance). Site inspections are required per MCM#4.
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** Construction site inspections are required per MCM#4. Such inspections also ensure that post-construction controls are installed per requirements for applicable sites.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Stark SWCD/Urban Resource Coordinator
8. **Agreement Needed for Implementation (Permit Part III.C.)?** Yes
9. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):**
 - a. Renew MOU between City and Stark SWCD annually
 - b. Continue to inspect applicable construction sites
 - c. Notify City of Canton for enforcement of violations, as applicable
10. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
11. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.5.g.):**
 - a. Indication of MOU renewal
 - b. # and frequency of site inspections
 - c. # of violation letters issued and corresponding status
12. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):**
 - a. Copy of MOU and payment verification
 - b. Copies of site inspection letters
 - c. Copies of notifications to City, as applicable
13. **For Further BMP Guidance:** Refer to "BMP Inspection and Maintenance" BMP (under USEPA MCM#5: Post-Construction Stormwater Management in New Development and Redevelopment) on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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Minimum Control Measure (MCM) #5: Post-Construction Storm Water Management in New Development and Redevelopment

“Post-Construction Storm Water Management Program (SWMP)”: Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

1. **BMP#:** 15
2. **Permit Requirement:** Ensurance of Adequate Long-Term Operation and Maintenance of Post-Construction BMPs through Operation and Maintenance Plans and Agreements
3. **BMP Name (Permit Part III.A.1.a.):** Long-term maintenance of post-construction BMPs
4. **BMP Description (Permit Part III.A.1.a.):** The Stark SWCD and City of Canton require Long-Term Maintenance Plans (LTMPs) to be developed for all applicable sites required to implement post-construction storm water quality BMPs. Stark SWCD reviews LTMPs for appropriate content in accordance with permit expectations. Since 2007, the City and Stark SWCD have an active Memorandum of Understanding (MOU) which describes the role of Stark SWCD in inspecting post-construction storm water quality BMPs, informing the responsible entity/operator (i.e. the person/party named in the LTMP) and City of Canton of all required maintenance. If the maintenance items are not completed by the responsible entity/operator in the timeline given by the SWCD, the SWCD will notify the City of Canton so that the City can take the appropriate enforcement/penalty actions to ensure the necessary maintenance will occur. Also, the "City of Canton Storm Water Management Manual" (as part of City's "Storm Water Management" ordinance) formally specifies requirements for LTMPs.
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** Required per Part III.B.5.d and Part III.B.5.e.vi.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Stark SWCD/Urban Resource Coordinator
8. **Agreement Needed for Implementation (Permit Part III.C.)?** Yes
9. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):**
 - a. Renew MOU between City and Stark SWCD annually
 - b. Ensure LTMPs are in place for applicable sites
 - c. Perform annual inspection of post-construction WQ BMPs
 - d. Ensure appropriate maintenance, etc occurs, as necessary
10. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
11. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.5.g.):**
 - a. Indication of MOU renewal
 - b. Summary of # of LTMPs developed and in place
 - c. # of inspections of post-construction WQ BMPs performed and frequency of inspections
 - d. Summary status of any necessary maintenance
12. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):**
 - a. Copy of MOU and payment verification
 - b. Copies of LTMPs
 - c. Inspection reports
 - d. Supporting documentation, as necessary
13. **For Further BMP Guidance:** Refer to "BMP Inspection and Maintenance" BMP (under USEPA MCM#5: Post-Construction Stormwater Management in New Development and Redevelopment) on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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6 Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations

“Pollution Prevention/Good Housekeeping (Operation and Maintenance) Program”: Overview

MCM PERMIT REQUIREMENTS:

Permit Part III.B.6.a.: [City of Canton] shall develop and implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations; and

Permit Part III.B.6.b.: Using training materials that are available from Ohio EPA or other organizations, [City of Canton's] program shall include employee training to prevent and reduce storm water pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and storm water system maintenance; and

Permit Part III.B.6.c.: [City of Canton] shall include a list of industrial facilities [it] owns or operates that are subject to Ohio EPA's Industrial Storm Water General Permit or individual NPDES permits for discharges of storm water associated with industrial activity that ultimately discharge to [City of Canton's] MS4. Include the Ohio EPA permit number or a copy of the Industrial NOI form for each facility. For [City of Canton's] municipal facilities that conduct activities described in 40 CFR 122.26(b)(14) that are not required to obtain Industrial Storm Water General Permit coverage, including vehicle maintenance facilities, bus terminals, composting facilities, impoundment lots, and waste transfer stations, a Storm Water Pollution Prevention Plan (SWP3) shall be developed and implemented in accordance with the SWP3 requirements of Ohio EPA's Industrial Storm Water General Permit (OHR000004). [Since City of Canton] initially had coverage under a previous version of this permit [it] shall develop and implement SWP3s for these facilities, if needed, within two years of when [City of Canton's] coverage under this general permit was granted [6/4/09].

Response: The City of Canton owns/operates three "industrial facilities" that are subject to Ohio EPA's Industrial Storm Water General Permit or individual NPDES permits for discharges of storm water associated with industrial activity that ultimately discharge to the City's MS4:

- 1) Canton Water Pollution Control Center - NPDES Permit No. 3PE00000*OD
- 2) Canton Water Department (NE) - NPDES Permit No. 3IY00011011
- 3) Canton Water Department (NW) - NPDES Permit No. 3IY00010*ED

The City owns/operates another facility, Canton Water Department (SC) - NPDES Permit No. 3IY00012*ED (in Sugar Creek Township, Stark County), that is subject to the Ohio EPA's individual NPDES permit for discharges of storm water associated with industrial activity but does not ultimately discharge to a City MS4 because the facility is not located within the City of Canton's corporation limits nor is it located within an urbanized area.

For development of SWP3s for City-owned/operated vehicle maintenance facilities, see "Service Center SWP3" and "Fire Station #1 SWMP" BMPs below for further details.

For development of SWP3s for City-owned/operated impound lots, see "Impound Lot SWP3" BMP below for further details.

The City of Canton does not own or operate any bus terminals, composting facilities, or waste transfer stations, and therefore is not required to develop and implement SWP3s for such.

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DECISION PROCESS (RATIONALE STATEMENT) FOR DEVELOPMENT OF POLLUTION PREVENTION/GOOD HOUSEKEEPING – OPERATIONS AND MAINTENANCE (O&M) PROGRAM:

Permit Part III.B.6.d.: [City of Canton] shall document [its] decision process for the development of a pollution prevention/good housekeeping program for municipal operations. [City of Canton's] rationale statement shall address both [its] overall pollution prevention/good housekeeping program and the individual BMPs, measurable goals, and responsible persons for [City of Canton's] program.

Response: The City of Canton supports EPA's assessment that the City must examine and subsequently alter its own actions to help ensure a reduction in the amount and type of pollution that: (1) collects on streets, parking lots, open spaces, and storage and vehicle maintenance areas and is discharged into local waterways; and (2) results from actions such as environmentally damaging land development and flood management practices or poor maintenance of storm sewer systems. While implementing a Pollution Prevention/Good Housekeeping Program is meant primarily to improve or protect receiving water quality by altering municipal or facility operations, it also can result in a cost savings for the City of Canton since proper and timely maintenance of MS4s can help avoid repair costs from damage caused by age and neglect. See USEPA's Stormwater Phase II Final Rule Fact Sheet Series at <http://cfpub.epa.gov/npdes/stormwater/swfinal.cfm> for further information on the NPDES Phase II Small MS4 Storm Water Program and the associated Minimum Control Measures.

The City of Canton is to implement the BMPs described below as part of its Pollution Prevention/Good Housekeeping - Operation and Maintenance Program. The identified BMPs are those that the City believes are needed to meet permit requirements and/or expectations. See "Pollution Prevention/Good Housekeeping for Municipal Operations" on USEPA's National Menu of Stormwater Best Management Practices at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/> for further BMP guidance and information.

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Permit Part III.B.6.d.: The rationale statement shall include the following information, at a minimum:

Permit Part III.B.6.d.i.: [City of Canton's] operation and maintenance program to prevent or reduce pollutant runoff from [its] municipal operations. [City of Canton's] program shall specifically list the municipal operations that are impacted by this operation and maintenance program.

Response: The City of Canton Service Center (located at 2436 30th St NE, Canton, OH 44705) is made up of the following City departments: Engineering (Civil and Traffic Divisions), Parks, Police Impound, Sanitation, Street, Collection Systems (Sewer), Motor Vehicles (vehicle maintenance), and Recreation. These departments are directly or indirectly involved with certain municipal operations such as roadway maintenance, storm and sanitary sewer maintenance, parks and open space maintenance, fleet maintenance, new infrastructure planning and construction, etc. These activities can ultimately have impacts on the quality of storm water runoff and the receiving local water bodies. Therefore, this MCM impacts the operations performed by the departments that make up the City Service Center more than any other City departments. However, other City Departments may have certain responsibilities pertaining to this MCM as well. City departments/facilities that are affected by or responsible for respective BMPs are provided below.

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Permit Part III.B.6.d.ii.: Any government employee training program [City of Canton] will use to prevent and reduce storm water pollution from activities such as park and open space maintenance, fleet

and building maintenance, new construction and land disturbances, and storm water system maintenance. Describe any existing available materials [City of Canton] plans to use. Describe how this training program will be coordinated with the outreach programs developed for the public information minimum measure and the illicit discharge minimum measure.

Response: The City of Canton is required to train government employees on ways to prevent or reduce storm water pollution prevention from municipal activities. See "Government employee training/education" BMP below for further details.

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Permit Part III.B.6.d.iii.: [City of Canton's] program description shall specifically address the following areas:

Permit Part III.B.6.d.iii.1.: Maintenance activities, maintenance schedules, and long-term inspection procedures for controls to reduce floatables and other pollutants to [City of Canton's] MS4.

Response: The City of Canton is required to address maintenance activities, maintenance schedules, and long-term inspection procedures for controls to reduce floatables and other pollutants to the MS4. See all respective BMPs below for further details.

In general, some of the BMPs implemented by the City of Canton to reduce floatables and other pollutants to [and from] the MS4 are scheduled, as applicable. Others are "reactive" and are performed in response to complaints or necessity. Many of the BMPs are typically "routine maintenance" by nature and are performed continually or on an as-needed basis. For example, "street sweeping" and "lot sweeping" are often "scheduled" as part of routine maintenance instead of performed as a reaction to complaints. "Long term inspection of permanent post-construction storm water quality BMPs" has a "scheduled" aspect to it in that the Stark SWCD annually performs inspections of permanent post-construction storm water quality BMPs. So, depending on the nature of the respective BMP, there may or may not be a "scheduled" aspect to it. See each BMP within this MCM for further details and indication of any "scheduled" aspect.

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Permit Part III.B.6.d.iii.2.: Controls for reducing or eliminating the discharge of pollutants from streets, roads, highways, municipal parking lots, maintenance and storage yards, waste transfer stations, fleet or maintenance shops with outdoor storage areas, and salt/sand storage locations and snow disposal areas [City of Canton] operates. A description of the materials used for roadway and municipal parking lot winterization (use of salt, sand, bottom ash, etc. or a combination thereof), associated application rates, and the rationale for the selected application rates shall be included. Also identify controls or practices to be used for reducing or eliminating discharges of pollutants resulting from highway and municipal parking lot winterization activities.

Response: The City of Canton is required to implement controls for reducing or eliminating the discharge of pollutants from the identified sources and provide descriptions of winter management materials and a rationale for their associated application rates. See all respective BMPs below for further details.

The City of Canton does not own or operate any waste transfer stations and therefore has no controls for reducing or eliminating the discharge of pollutants from such.

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Permit Part III.B.6.d.iii.3.: Procedures for the proper disposal of waste removed from [City of Canton's] MS4 and [its] municipal operations, including dredge spoil, accumulated sediments, floatables, and other debris.

Response: The City of Canton is required to implement procedures for the proper disposal of waste removed from the MS4 and municipal operations. See all respective BMPs below for further details.

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Permit Part III.B.6.d.iii.4.: Procedures to ensure that new flood management projects are assessed for impacts on water quality and existing projects are assessed for incorporation of additional water quality protection devices or practices.

Response: The City of Canton is required to ensure that new flood management projects are assessed for impacts on water quality and existing projects are assessed for incorporation of water quality protection devices. See "Water quality considerations for flood management projects" BMP below for further details.

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Permit Part III.B.6.d.iv.: Who is responsible for overall management and implementation of [City of Canton's] pollution prevention/good housekeeping program and, if different, who is responsible for each of the BMPs identified for this program.

Response: The City of Canton interprets the term "pollution prevention/good housekeeping program" to be synonymous with the term "operation and maintenance program" as used elsewhere in the permit for describing the requirements of this MCM. Even though the Assistant City Engineer in the Civil Division of the Engineering Department is the primary contact for the SWMP and responsible for preparing annual reports, the Service Director is responsible for the overall management and implementation of the City of Canton's Pollution Prevention/Good Housekeeping Program. However, each BMP listed below identifies the particular City department or entity and position primarily responsible for the implementation of the respective BMP. Depending on the nature of the BMP, some may list more than one responsible position. Each responsible position is to maintain all records of supporting information for respective BMP implementation.

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Permit Part III.B.6.d.v.: How [City of Canton] will evaluate the success of this minimum measure, including how [City of Canton] selected the measurable goals for each of the BMPs.

Response: In time, the City of Canton is to measure the success of this MCM by determining if the measurable goals for the BMPs are met (through annual reports) as well as by implementing the BMPs in accordance with applicable recommendations as identified on USEPA's National Menu of Stormwater Best Management Practices. Each identified responsible position is to provide the respective information for Annual Reports to the Assistant City Engineer in the Civil Division of the City Engineering Department by no later than February 15th, annually. Ideally, the success of the City's SWMP may be evaluated based on the results of field monitoring in the Nimishillen Creek and/or other indicators. Each BMP listed below describes an associated measurable goal or goals. The goals were selected based on some practical and/or quantifiable (if possible) aspect of their implementation and the ease of measuring such aspect which provides simple indication of whether the BMP is successfully implemented.

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PERFORMANCE STANDARDS:

Permit Part III.B.6.e.: [City of Canton's] pollution prevention/good housekeeping program shall include, at a minimum, annual employee training. [City of Canton's] operation and maintenance program shall include appropriate procedures, controls, maintenance schedules, and recordkeeping to address Part III.B.6.d.iii of this permit.

ANNUAL REPORTING:

Permit Part III.B.6.f.: Annual Reports shall document the following: (1) summary of employee training program(s) implemented with number of employees that attended and (2) summary of activities and procedures implemented for O&M Program.

Table 6

Minimum Control Measure (MCM)#6: Pollution Prevention/Good Housekeeping for Municipal Operations

MCM#6 DEPARTMENTAL INVOLVEMENT

Summary of Departments/Responsible Positions with Considerable Involvement in MCM#6 and Associated Best Management Practices (BMPs)

Overall Authority	Department	Division	Responsible Position ¹	BMP #s ²	Total BMPs in MCM#6
Mayor	Mayor's Administration		Mayor	Not applicable	0
Mayor	Mayor's Administration		Management Assistant	Not applicable	0
Mayor	Mayor's Administration		Service Director	21	1
Service Director	Building Maintenance		Supervisor	18, 22	2
Service Director	Civic Center		Manager	18, 22	2
Service Director	Collection Systems		Superintendent	7, 18, 21, 22, 35	5
Service Director	Development		Director	Not applicable	0
Service Director	Division of Motor Vehicles		Superintendent	2, 19, 20, 21, 22, 24	6
Service Director	Sanitation		Superintendent	22	1
Service Director	Street		Superintendent	5, 6, 18, 21, 22, 23, 25, 26, 27, 28, 34	11
Service Director	Water		Superintendent	18, 19, 21, 22, 28	5
Service Director	Water Reclamation Facility		Superintendent	18, 19, 21, 22, 28	5
Service Director	Engineering		City Engineer	18, 36	2
City Engineer	Engineering	Civil	Assistant City Engineer	Not applicable	0
City Engineer	Engineering	Traffic	Assistant City Engineer	6, 22, 28	3
Mayor	Mayor's Administration		Safety Director	Not applicable	0
Safety Director	Building	Zoning	Zoning Inspector	Not applicable	0
Safety Director	Fire		Chief	3, 18, 20, 21, 22, 24	6
Safety Director	Police	Impound	Lieutenant	4, 22	2
Board of Health	Health	Environmental Health	Environmental Health Director	Not applicable	0
Judges	Judges	Community Service	Community Service Director	Not applicable	0
Park Commission	Park		Director	18, 21, 22, 28	4
Joint Recreation District	Recreation		Director	18, 22	2
Stark County	SWCD		Urban Resource Coordinator	Not applicable	0

Footnotes:

1 – See Table B for Responsible Position contact information

2 – Refer to identified BMPs within this Minimum Control Measure section of the Storm Water Management Program for details

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Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations

“Pollution Prevention/Good Housekeeping (Operation and Maintenance) Program”: Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

1. **BMP#:** 1
2. **Permit Requirement:** Government employee training to prevent and reduce pollutant runoff from municipal operations
3. **BMP Name (Permit Part III.A.1.a.):** Government employee training/education
4. **BMP Description (Permit Part III.A.1.a.):** (Such training is required per Part III.B.6.a. and b. and Part III.B.6.e. This requirement is addressed under MCM#1. See "Government employee training/education" BMP under MCM#1 for details.)
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** (See BMP Description)
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** (See BMP Description)
7. **City Departments/Facilities with Significant Involvement:** (See BMP Description)
8. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** (See BMP Description)
9. **Agreement Needed for Implementation (Permit Part III.C.)?** (See BMP Description)
10. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):** (See BMP Description)
11. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** (See BMP Description)
12. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.6.f.):** (See BMP Description)
13. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):** (See BMP Description)
14. **For Further BMP Guidance:** (See BMP Description)

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Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations

“Pollution Prevention/Good Housekeeping (Operation and Maintenance) Program”: Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

1. **BMP#:** 2
2. **Permit Requirement:** Storm Water Pollution Prevention Plans (SWP3s) for municipal facilities that conduct activities described in 40 CFR 122.26(b)(14) that are not required to obtain Industrial Storm Water General Permit coverage, including: Vehicle maintenance facilities
3. **BMP Name (Permit Part III.A.1.a.):** Division of Motor Vehicles SWP3
4. **BMP Description (Permit Part III.A.1.a.):** The City's Division of Motor Vehicles (DMV) is the City vehicle maintenance facility located at the City Service Center (2436 30th St NE, Canton, OH 44705). This facility falls within the designated categories of "industrial facilities" that the City owns or operates. However, per Ohio EPA's June 2009 "Guidance for MS4 Operated Industrial Facilities" flowchart and answering "No" to all eleven questions of the "Exposure Checklist" based on the descriptions of "industrial materials and activities" on USEPA's "No Exposure Certification", this facility can certify "No Exposure". Therefore, an SWP3 is not required to be prepared and implemented in accordance with the SWP3 requirements of Ohio EPA's Industrial Storm Water General Permit (OHR000004).
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** Required per Part III.B.6.c.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **City Departments/Facilities with Significant Involvement:** Division of Motor Vehicles (DMV)
8. **Entry/Position Responsible for Implementation (Permit Part III.A.1.d.):** DMV/Superintendent
9. **Agreement Needed for Implementation (Permit Part III.C.)?** No
10. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):** Annually ensure USEPA's "No Exposure Certification" applies
11. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
12. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.6.f.):** Indication if "No Exposure" can be certified
13. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):** Completed "No Exposure Certification"
14. **For Further BMP Guidance:** Refer to Ohio EPA's June 2009 "Guidance for MS4 Operated Industrial Facilities" flowchart, USEPA's "No Exposure Certification for Exclusion from NPDES Stormwater Permitting", and Industrial Storm Water General Permit (OHR000004) at <http://www.epa.ohio.gov/dsw/storm/index.aspx>

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Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations

“Pollution Prevention/Good Housekeeping (Operation and Maintenance) Program”: Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

1. **BMP#:** 3
2. **Permit Requirement:** Storm Water Pollution Prevention Plans (SWP3s) for municipal facilities that conduct activities described in 40 CFR 122.26(b)(14) that are not required to obtain Industrial Storm Water General Permit coverage, including: Vehicle maintenance facilities
3. **BMP Name (Permit Part III.A.1.a.):** Fire Station #1 SWP3
4. **BMP Description (Permit Part III.A.1.a.):** City Fire Station #1 is located at 110 7th St SW, Canton, OH 44702. Fire Station #1 falls within the designated categories of "municipal facilities" that the City owns or operates because it has a vehicle maintenance facility where Fire Department owned/operated vehicles are serviced/maintained. However, per Ohio EPA's June 2009 "Guidance for MS4 Operated Industrial Facilities" flowchart and answering "No" to all eleven questions of the "Exposure Checklist" based on the descriptions of "industrial materials and activities" on USEPA's "No Exposure Certification", this facility can certify "No Exposure". Therefore, an SWP3 is not required to be prepared and implemented in accordance with the SWP3 requirements of Ohio EPA's Industrial Storm Water General Permit (OHR000004).
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** Required per Part III.B.6.c.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **City Departments/Facilities with Significant Involvement:** Fire Station #1
8. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Fire Department/Chief
9. **Agreement Needed for Implementation (Permit Part III.C.)?** No
10. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):** Annually ensure USEPA's "No Exposure Certification" applies
11. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
12. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.6.f.):** Indication if "No Exposure" can be certified
13. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):** Completed "No Exposure Certification"
14. **For Further BMP Guidance:** Refer to Ohio EPA's June 2009 "Guidance for MS4 Operated Industrial Facilities" flowchart, USEPA's "No Exposure Certification for Exclusion from NPDES Stormwater Permitting", and Industrial Storm Water General Permit (OHR000004) at <http://www.epa.ohio.gov/dsw/storm/index.aspx>

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Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations

“Pollution Prevention/Good Housekeeping (Operation and Maintenance) Program”: Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

1. **BMP#:** 4
2. **Permit Requirement:** Storm Water Pollution Prevention Plans (SWP3s) for municipal facilities that conduct activities described in 40 CFR 122.26(b)(14) that are not required to obtain Industrial Storm Water General Permit coverage, including: Impoundment Lots
3. **BMP Name (Permit Part III.A.1.a.):** Impound Lot SWP3
4. **BMP Description (Permit Part III.A.1.a.):** The City's Police Department Impound Lot falls within the designated categories of "municipal facilities" (impound lots) that the City owns or operates. The Impound Lot is where impounded vehicles are taken and stored until the vehicle owners pay to retrieve the vehicles or the vehicles are sold via auction. The Impound Lot is located at the City Service Center: 2436 30th St NE, Canton, OH 44705). However, per footnote #2 on Ohio EPA's June 2009 "Guidance for MS4 Operated Industrial Facilities" flowchart, the City Impound Lot does not have a vehicle maintenance shop, does not perform equipment cleaning operations, and does not perform airport deicing operations. Therefore, an SWP3 is not required to be prepared and implemented in accordance with the SWP3 requirements of Ohio EPA's Industrial Storm Water General Permit (OHR000004).
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** Required per Part III.B.6.c.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **City Departments/Facilities with Significant Involvement:** Impound Lot (Police Department)
8. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Police Department/Lieutenant
9. **Agreement Needed for Implementation (Permit Part III.C.)?** No
10. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):** Annually verify status of Impound Lot with current Ohio EPA Industrial Facility SWP3 applicability
11. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
12. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.6.f.):** Indication if SWP3 must be developed and implemented
13. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):** Supporting documentation, as applicable
14. **For Further BMP Guidance:** Refer to Ohio EPA's June 2009 "Guidance for MS4 Operated Industrial Facilities" flowchart, USEPA's "No Exposure Certification for Exclusion from NPDES Stormwater Permitting", and Industrial Storm Water General Permit (OHR000004) at <http://www.epa.ohio.gov/dsw/storm/index.aspx>

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Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations

“Pollution Prevention/Good Housekeeping (Operation and Maintenance) Program”: Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

1. **BMP#:** 5
2. **Permit Requirement:** Maintenance activities, schedules, and long-term inspection procedures for controls to reduce floatables and other pollutants to [and from] [City of Canton’s] MS4: Maintenance activities
3. **BMP Name (Permit Part III.A.1.a.):** Street sweeping
4. **BMP Description (Permit Part III.A.1.a.):** Streets, roads, highways and parking lots accumulate significant amounts of pollutants that contribute to stormwater pollutant runoff to surface waters. Pollutants, including sediment, debris, trash, road salt, and trace metals can be minimized by street sweeping. Street sweeping can also improve the aesthetics of municipal roadways, control dust and decrease the accumulation of pollutants in catch basins. An effective municipal street sweeping program can meet regulatory requirements, assess street sweeping effectiveness, and minimize pollutants in roadways. Street sweeping is a maintenance activity the City performs to reduce floatables and other pollutants to and from the MS4. The Street Department performs routine sweeping of city streets throughout the year. Maintenance and inspection schedules have been developed for certain City streets.
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** BMP assists in satisfying Parts III.B.6.d.iii.1. and 2.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **City Departments/Facilities with Significant Involvement:** Street Department
8. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Street Department/Superintendent
9. **Agreement Needed for Implementation (Permit Part III.C.)?** No
10. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):**
 - a. Annually review referenced USEPA BMP descriptions with appropriate department/ facility employees (see item#14)
 - b. Continue to perform street sweeping to reduce floatables and other pollutants to and from the MS4
 - c. Sweep City streets in accordance with maintenance schedules, as applicable
11. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
12. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.6.f.):**
 - a. Indication if referenced USEPA BMP descriptions were reviewed with appropriate department/ facility employees
 - b. Total # of lane-miles swept
 - c. Indication if streets are swept in accordance with maintenance schedules, as applicable
13. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):**
 - a. Printout of current referenced USEPA BMP descriptions; and date(s) reviewed with employees; and # of employees reviewed with
 - b. Sweeping records documenting lane-miles swept
 - c. Copy of maintenance schedules indicating sweeping schedules, as applicable
14. **For Further BMP Guidance:** Refer to "Parking Lot and Street Cleaning" BMP (under USEPA MCM#6: Pollution Prevention/Good Housekeeping for Municipal Operations) on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations

“Pollution Prevention/Good Housekeeping (Operation and Maintenance) Program”: Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

1. **BMP#:** 6
2. **Permit Requirement:** Maintenance activities, schedules, and long-term inspection procedures for controls to reduce floatables and other pollutants to [and from] [City of Canton’s] MS4: Maintenance activities
3. **BMP Name (Permit Part III.A.1.a.):** Lot sweeping
4. **BMP Description (Permit Part III.A.1.a.):** Municipal parking lots accumulate significant amounts of pollutants that contribute to stormwater pollutant runoff to surface waters. Pollutants, including sediment, debris, trash, road salt, and trace metals can be minimized by lot sweeping. Lot sweeping can also improve the aesthetics of municipal lots, control dust and decrease the accumulation of pollutants in catch basins. Lot sweeping is a maintenance activity the City performs, as necessary, to reduce floatables and other pollutants to and from the MS4.

Municipal (City-owned) parking lots can be classified into 2 categories: those used for public parking (2 decks, 3 lots) and those used for City employee parking (various locations throughout City). All public-use parking lots are maintained by the Traffic: Parking Division of the City Engineering Department, while the maintenance of all City employee parking lots is typically the responsibility of the respective departments utilizing the lots.

Scheduled sweepings are typically performed on public-use lots, while visual inspections are used to determine the need for lot sweeping on City employee lots. The Engineering Traffic: Parking Division and Street Department both have street sweepers that are used as necessary, for public-use and City employee lots, respectively, or lot sweeping may be contracted out if desired.

5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** BMP assists in satisfying Parts III.B.6.d.iii.1. and 2.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **City Departments/Facilities with Significant Involvement:**
 - Engineering Department (Traffic Division: Parking)
 - Street Department
8. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):**
 - Engineering Department (Traffic Division: Parking)/Assistant City Engineer
 - Street Department/Superintendent
9. **Agreement Needed for Implementation (Permit Part III.C.)?** No
10. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):**
 - a. Annually review referenced USEPA BMP descriptions with appropriate department/ facility employees (see item#14)
 - b. Engineering Department (Traffic Division: Parking): Sweep all public-use parking lots/decks a minimum of 4 times per year;
Street Department: Perform lot sweeping as requested by respective departments utilizing lots
11. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
12. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.6.f.):**
 - a. Indication if referenced USEPA BMP descriptions were reviewed with appropriate department/ facility employees
 - b. Engineering Department (Traffic Division: Parking): Locations/names of public-use lots/decks and # of times swept per year

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Street Department: Locations of City employee lots swept and # of times swept per year

13. Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):

- a. Printout of current referenced USEPA BMP descriptions; and date(s) reviewed with employees; and # of employees reviewed with
- b. Respective sweeping records documenting lots/decks swept

14. For Further BMP Guidance: Refer to "Parking Lot and Street Cleaning" BMP (under USEPA MCM#6: Pollution Prevention/Good Housekeeping for Municipal Operations) on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations

“Pollution Prevention/Good Housekeeping (Operation and Maintenance) Program”: Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

1. **BMP#:** 7
2. **Permit Requirement:** Maintenance activities, schedules, and long-term inspection procedures for controls to reduce floatables and other pollutants to [and from] [City of Canton’s] MS4: Maintenance activities
3. **BMP Name (Permit Part III.A.1.a.):** Storm drain system cleaning
4. **BMP Description (Permit Part III.A.1.a.):** Storm drain system cleaning is a maintenance activity the City performs to reduce floatables and other pollutants to and from the MS4. The Collection Systems (Sewer) Department performs catch basin, manhole, and storm line cleaning throughout the year. Priority is typically given to certain storm sewer systems (such as those serving main streets and highways) while others are cleaned based on responses to complaints.
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** BMP assists in satisfying Parts III.B.6.d.iii.1. and 2.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **City Departments/Facilities with Significant Involvement:** Collection Systems (Sewer) Department
8. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Collection Systems (Sewer) Department/Superintendent
9. **Agreement Needed for Implementation (Permit Part III.C.)?** No
10. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):**
 - a. Annually review referenced USEPA BMP descriptions with appropriate department/ facility employees (see item#14)
 - b. Continue to perform storm sewer system cleaning to reduce floatables and other pollutants to and from the MS4
11. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
12. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.6.f.):**
 - a. Indication if referenced USEPA BMP descriptions were reviewed with appropriate department/ facility employees
 - b. # of manholes and catch basins cleaned; and footage of storm lines cleaned
13. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):**
 - a. Printout of current referenced USEPA BMP descriptions; and date(s) reviewed with employees; and # of employees reviewed with
 - b. Storm sewer system cleaning records
14. **For Further BMP Guidance:** Refer to "Storm Drain System Cleaning" BMP (under USEPA MCM#6: Pollution Prevention/Good Housekeeping for Municipal Operations) on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations

“Pollution Prevention/Good Housekeeping (Operation and Maintenance) Program”: Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

1. **BMP#:** 8
2. **Permit Requirement:** Maintenance activities, schedules, and long-term inspection procedures for controls to reduce floatables and other pollutants to [and from] [City of Canton’s] MS4: Inspection procedures
3. **BMP Name (Permit Part III.A.1.a.):** Dry-weather field screening of storm water outfalls
4. **BMP Description (Permit Part III.A.1.a.):** (Maintenance activities, schedules, and long-term inspection procedures for controls to reduce floatables and other pollutants to [and from] [City of Canton’s] MS4 are required per Part III.B.6.d.iii.1. This BMP is an inspection procedure that assists in satisfying the permit requirement and is also performed to help satisfy requirements of MCM#3. See "Dry-weather field-screening of storm water outfalls" BMP under MCM#3 for details.)
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** (See BMP Description)
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** (See BMP Description)
7. **City Departments/Facilities with Significant Involvement:** (See BMP Description)
8. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** (See BMP Description)
9. **Agreement Needed for Implementation (Permit Part III.C.):** (See BMP Description)
10. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):** (See BMP Description)
11. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** (See BMP Description)
12. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.6.f.):** (See BMP Description)
13. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):** (See BMP Description)
14. **For Further BMP Guidance:** (See BMP Description)

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Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations

“Pollution Prevention/Good Housekeeping (Operation and Maintenance) Program”: Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

1. **BMP#:** 9
2. **Permit Requirement:** Maintenance activities, schedules, and long-term inspection procedures for controls to reduce floatables and other pollutants to [and from] [City of Canton’s] MS4: Inspection procedures
3. **BMP Name (Permit Part III.A.1.a.):** Televising storm sewers
4. **BMP Description (Permit Part III.A.1.a.):** (Maintenance activities, schedules, and long-term inspection procedures for controls to reduce floatables and other pollutants to [and from] [City of Canton’s] MS4 are required per Part III.B.6.d.iii.1. This BMP is an inspection procedure that assists in satisfying the permit requirement and is also performed to help satisfy requirements of MCM#3. See "Televising storm sewers" BMP under MCM#3 for details.)
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** (See BMP Description)
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** (See BMP Description)
7. **City Departments/Facilities with Significant Involvement:** (See BMP Description)
8. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** (See BMP Description)
9. **Agreement Needed for Implementation (Permit Part III.C.):** (See BMP Description)
10. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):** (See BMP Description)
11. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** (See BMP Description)
12. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.6.f.):** (See BMP Description)
13. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):** (See BMP Description)
14. **For Further BMP Guidance:** (See BMP Description)

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Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations

“Pollution Prevention/Good Housekeeping (Operation and Maintenance) Program”: Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

1. **BMP#:** 10
2. **Permit Requirement:** Maintenance activities, schedules, and long-term inspection procedures for controls to reduce floatables and other pollutants to [and from] [City of Canton’s] MS4: Inspection procedures
3. **BMP Name (Permit Part III.A.1.a.):** Sewer dye-testing
4. **BMP Description (Permit Part III.A.1.a.):** (Maintenance activities, schedules, and long-term inspection procedures for controls to reduce floatables and other pollutants to [and from] [City of Canton’s] MS4 are required per Part III.B.6.d.iii.1. This BMP is an inspection procedure that assists in satisfying the permit requirement and is also performed to help satisfy requirements of MCM#3. See "Sewer dye-testing" BMP under MCM#3 for details.)
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** (See BMP Description)
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** (See BMP Description)
7. **City Departments/Facilities with Significant Involvement:** (See BMP Description)
8. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** (See BMP Description)
9. **Agreement Needed for Implementation (Permit Part III.C.):** (See BMP Description)
10. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):** (See BMP Description)
11. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** (See BMP Description)
12. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.6.f.):** (See BMP Description)
13. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):** (See BMP Description)
14. **For Further BMP Guidance:** (See BMP Description)

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Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations

“Pollution Prevention/Good Housekeeping (Operation and Maintenance) Program”: Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

1. **BMP#:** 11
2. **Permit Requirement:** Maintenance activities, schedules, and long-term inspection procedures for controls to reduce floatables and other pollutants to [and from] [City of Canton’s] MS4: Inspection procedures
3. **BMP Name (Permit Part III.A.1.a.):** Long-term maintenance of post-construction BMPs
4. **BMP Description (Permit Part III.A.1.a.):** (Maintenance activities, schedules, and long-term inspection procedures for controls to reduce floatables and other pollutants to [and from] MS4 are required per Part III.B.6.d.iii.1. This BMP includes an inspection procedure that assists in satisfying the permit requirement and is also performed to help satisfy requirements of MCM#5. See "Long-term maintenance of post-construction BMPs" BMP under MCM#5 for details.)
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** (See BMP Description)
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** (See BMP Description)
7. **City Departments/Facilities with Significant Involvement:** (See BMP Description)
8. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** (See BMP Description)
9. **Agreement Needed for Implementation (Permit Part III.C.):** (See BMP Description)
10. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):** (See BMP Description)
11. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** (See BMP Description)
12. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.6.f.):** (See BMP Description)
13. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):** (See BMP Description)
14. **For Further BMP Guidance:** (See BMP Description)

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Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations

“Pollution Prevention/Good Housekeeping (Operation and Maintenance) Program”: Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

1. **BMP#:** 12
2. **Permit Requirement:** Controls for reducing or eliminating the discharge of pollutants from: Streets, roads, highways
3. **BMP Name (Permit Part III.A.1.a.):** Street sweeping
4. **BMP Description (Permit Part III.A.1.a.):** (Controls for reducing or eliminating the discharge of pollutants from streets, roads, and highways are required per Part III.B.6.d.iii.2. The identified BMP is implemented by the City to assist in satisfying this permit requirement as well as others. See BMP#5 “Street sweeping” under MCM#6 for details.)
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** (See BMP Description)
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** (See BMP Description)
7. **City Departments/Facilities with Significant Involvement:** (See BMP Description)
8. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** (See BMP Description)
9. **Agreement Needed for Implementation (Permit Part III.C.)?** (See BMP Description)
10. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):** (See BMP Description)
11. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** (See BMP Description)
12. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.6.f.):** (See BMP Description)
13. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):** (See BMP Description)
14. **For Further BMP Guidance:** (See BMP Description)

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Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations

“Pollution Prevention/Good Housekeeping (Operation and Maintenance) Program”: Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

1. **BMP#:** 13
2. **Permit Requirement:** Controls for reducing or eliminating the discharge of pollutants from: Streets, roads, highways
3. **BMP Name (Permit Part III.A.1.a.):** Storm drain system cleaning
4. **BMP Description (Permit Part III.A.1.a.):** (Controls for reducing or eliminating the discharge of pollutants from streets, roads, and highways are required per Part III.B.6.d.iii.2. The identified BMP is implemented by the City to assist in satisfying this permit requirement as well as others. See BMP#7 “Storm drain system cleaning” under MCM#6 for details.)
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** (See BMP Description)
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** (See BMP Description)
7. **City Departments/Facilities with Significant Involvement:** (See BMP Description)
8. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** (See BMP Description)
9. **Agreement Needed for Implementation (Permit Part III.C.)?** (See BMP Description)
10. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):** (See BMP Description)
11. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** (See BMP Description)
12. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.6.f.):** (See BMP Description)
13. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):** (See BMP Description)
14. **For Further BMP Guidance:** (See BMP Description)

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Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations

“Pollution Prevention/Good Housekeeping (Operation and Maintenance) Program”: Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

1. **BMP#:** 14
2. **Permit Requirement:** Controls for reducing or eliminating the discharge of pollutants from: Streets, roads, highways
3. **BMP Name (Permit Part III.A.1.a.):** Proper winter materials management
4. **BMP Description (Permit Part III.A.1.a.):** (Controls for reducing or eliminating the discharge of pollutants from streets, roads, and highways are required per Part III.B.6.d.iii.2. The identified BMP is implemented by the City to assist in satisfying this permit requirement as well as others. See BMP#27 “Proper winter materials management” under MCM#6 for details.)
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** (See BMP Description)
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** (See BMP Description)
7. **City Departments/Facilities with Significant Involvement:** (See BMP Description)
8. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** (See BMP Description)
9. **Agreement Needed for Implementation (Permit Part III.C.)?** (See BMP Description)
10. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):** (See BMP Description)
11. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** (See BMP Description)
12. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.6.f.):** (See BMP Description)
13. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):** (See BMP Description)
14. **For Further BMP Guidance:** (See BMP Description)

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Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations

“Pollution Prevention/Good Housekeeping (Operation and Maintenance) Program”: Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

1. **BMP#:** 15
2. **Permit Requirement:** Controls for reducing or eliminating the discharge of pollutants from: Municipal parking lots (including parking garages)
3. **BMP Name (Permit Part III.A.1.a.):** Lot sweeping
4. **BMP Description (Permit Part III.A.1.a.):** (Controls for reducing or eliminating the discharge of pollutants from municipal parking lots (including parking garages) are required per Part III.B.6.d.iii.2. The identified BMP is implemented by the City to assist in satisfying this permit requirement as well as others. See BMP#6 “Lot sweeping” under MCM#6 for details.)
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** (See BMP Description)
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** (See BMP Description)
7. **City Departments/Facilities with Significant Involvement:** (See BMP Description)
8. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** (See BMP Description)
9. **Agreement Needed for Implementation (Permit Part III.C.)?** (See BMP Description)
10. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):** (See BMP Description)
11. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** (See BMP Description)
12. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.6.f.):** (See BMP Description)
13. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):** (See BMP Description)
14. **For Further BMP Guidance:** (See BMP Description)

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Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations

“Pollution Prevention/Good Housekeeping (Operation and Maintenance) Program”: Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

1. **BMP#:** 16
2. **Permit Requirement:** Controls for reducing or eliminating the discharge of pollutants from: Municipal parking lots (including parking garages)
3. **BMP Name (Permit Part III.A.1.a.):** Storm drain system cleaning
4. **BMP Description (Permit Part III.A.1.a.):** (Controls for reducing or eliminating the discharge of pollutants from municipal parking lots (including parking garages) are required per Part III.B.6.d.iii.2. The identified BMP is implemented by the City to assist in satisfying this permit requirement as well as others. See BMP#7 “Storm drain system cleaning” under MCM#6 for details.)
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** (See BMP Description)
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** (See BMP Description)
7. **City Departments/Facilities with Significant Involvement:** (See BMP Description)
8. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** (See BMP Description)
9. **Agreement Needed for Implementation (Permit Part III.C.)?** (See BMP Description)
10. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):** (See BMP Description)
11. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** (See BMP Description)
12. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.6.f.):** (See BMP Description)
13. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):** (See BMP Description)
14. **For Further BMP Guidance:** (See BMP Description)

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Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations

“Pollution Prevention/Good Housekeeping (Operation and Maintenance) Program”: Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

1. **BMP#:** 17
2. **Permit Requirement:** Controls for reducing or eliminating the discharge of pollutants from: Municipal parking lots (including parking garages)
3. **BMP Name (Permit Part III.A.1.a.):** Proper winter materials management
4. **BMP Description (Permit Part III.A.1.a.):** (Controls for reducing or eliminating the discharge of pollutants from municipal parking lots (including parking garages) are required per Part III.B.6.d.iii.2. The identified BMP is implemented by the City to assist in satisfying this permit requirement as well as others. See BMP#27 “Proper winter materials management” under MCM#6 for details.)
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** (See BMP Description)
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** (See BMP Description)
7. **City Departments/Facilities with Significant Involvement:** (See BMP Description)
8. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** (See BMP Description)
9. **Agreement Needed for Implementation (Permit Part III.C.)?** (See BMP Description)
10. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):** (See BMP Description)
11. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** (See BMP Description)
12. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.6.f.):** (See BMP Description)
13. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):** (See BMP Description)
14. **For Further BMP Guidance:** (See BMP Description)

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Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations

“Pollution Prevention/Good Housekeeping (Operation and Maintenance) Program”: Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

1. **BMP#:** 18
2. **Permit Requirement:** Controls for reducing or eliminating the discharge of pollutants from: [Municipal properties and/or facilities &] maintenance and storage yards
3. **BMP Name (Permit Part III.A.1.a.):** Proper municipal landscaping
4. **BMP Description (Permit Part III.A.1.a.):** Municipal lawn and garden and landscaping activities can contaminate stormwater with pesticide, soil, herbicide, and fertilizer runoff. Proper landscape management, however, can effectively reduce water use and contaminant runoff, and enhance a property's aesthetics. Environmentally friendly landscape management protects the environment through careful planning and design, routine soil analysis, appropriate plant selection, use of practical turf areas and mulches, efficient water use, the reduction, elimination or judicious use of fertilizers, herbicides, and pesticides, and appropriate maintenance. As applicable, City departments that have a role in municipal landscaping are to implement use such practices accordingly.
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** BMP assists in satisfying Part III.B.6.d.iii.2.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **City Departments/Facilities with Significant Involvement:**
 - Collection Systems (Sewer) Department
 - Engineering Department
 - Parks Department
 - Recreation Department
 - Water Reclamation Facility
 - Street Department
 - Fire Department
 - Water Department
 - Building Maintenance Department
 - Civic Center
8. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):**
 - Collection Systems (Sewer) Department/Superintendent
 - Engineering Department/City Engineer
 - Parks Department//Director
 - Recreation Department/Director
 - Water Reclamation Facility/Superintendent
 - Street Department/Superintendent
 - Fire Department/Chief
 - Water Department/Superintendent
 - Building Maintenance Department/Superintendent
 - Civic Center/Manager
9. **Agreement Needed for Implementation (Permit Part III.C.)?** No
10. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):**
 - a. Annually review referenced USEPA BMP descriptions with appropriate department/ facility employees (see item#14)
 - b. Identify current municipal landscaping practices that are in conformance with applicable USEPA recommendations
 - c. Identify any deficiencies in current practices and investigate corresponding BMPs to implement to be in better conformance with USEPA recommendations

- 11. Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
- 12. Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.6.f.):**
- a. Indication if referenced USEPA BMP descriptions were reviewed with appropriate department/facility employees
 - b. Summary of current respective landscaping responsibilities/ practices that are in conformance with applicable USEPA recommendations
 - c. Summary of any deficiencies in current practices and corresponding status of investigation and implementation of additional BMPs to implement to be in better conformance with USEPA recommendations, as applicable
- 13. Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):**
- a. Printout of current referenced USEPA BMP descriptions; and date(s) reviewed with employees; and # of employees reviewed with
 - b. List of current applicable department landscaping responsibilities/ practices and description of their conformance with USEPA recommendations
 - c. Supporting documentation of status of additional BMP investigation and implementation, as applicable
- 14. For Further BMP Guidance:** Refer to "Municipal Landscaping" BMP (under USEPA MCM#6: Pollution Prevention/Good Housekeeping for Municipal Operations) on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations

“Pollution Prevention/Good Housekeeping (Operation and Maintenance) Program”: Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

1. **BMP#:** 19
2. **Permit Requirement:** Controls for reducing or eliminating the discharge of pollutants from: [Municipal properties and/or facilities &] maintenance and storage yards
3. **BMP Name (Permit Part III.A.1.a.):** Proper municipal vehicle fueling
4. **BMP Description (Permit Part III.A.1.a.):** Fueling fleets of municipal vehicles can generate spills and leaks of fuel (gasoline and diesel fuel) and heavy metals - disproportionately toxic compounds that if washed into the storm drain system by stormwater runoff can seriously impair the water quality of nearby waterbodies. Various BMPs can be implemented at fueling stations to reduce or prohibit fuels from washing into adjacent storm drainage systems. The City of Canton operates 4 municipal vehicle fueling stations. To discourage illicit discharges from the Service Center fueling station, the City provides the following BMPs: covered fuel area (prohibits direct rainfall contact) and catch basins with water quality inserts (see BMP#23 "Catch basins with water quality inserts" under MCM#6 for details). Spill cleanup materials are to be available at all four vehicle fueling stations. In cases of fuel spills on the ground surface, trained employees are to attempt to utilize absorbant materials accordingly to ensure no fuels wash into storm drainage systems.
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** BMP assists in satisfying Part III.B.6.d.iii.2.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **City Departments/Facilities with Significant Involvement:**
 - Division of Motor Vehicles (for City Service Center)
 - Division of Motor Vehicles (for Sign & Paint Shop)
 - Water Reclamation Facility
 - Water Department (for Sugarcreek WTP)
8. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):**
 - Division of Motor Vehicles (for City Service Center)/Superintendent
 - Division of Motor Vehicles (for Sign & Paint Shop)/Superintendent
 - Water Reclamation Facility/Superintendent
 - Water Department (for Sugarcreek WTP)/Superintendent
9. **Agreement Needed for Implementation (Permit Part III.C.)?** No
10. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):**
 - a. Annually review referenced USEPA BMP descriptions with appropriate department/ facility employees (see item#14)
 - b. Identify current fueling station practices/ features that are in conformance with USEPA recommendations
 - c. Identify any deficiencies in current practices/ features and investigate corresponding BMPs/ features to implement at respective fueling stations to be in better conformance with USEPA recommendations
 - d. Ensure spill prevention plans and cleanup materials are readily available at each fueling station
 - e. Ensure appropriate employees are trained to properly respond to fuel spills
11. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
12. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.6.f.):**
 - a. Indication if referenced USEPA BMP descriptions were reviewed with appropriate department/ facility employees
 - b. Summary of current facility practices/ features that are in conformance with USEPA recommendations

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- c. Summary of any deficiencies in current practices/ features and corresponding status of investigation of additional BMPs/ features to implement to be in better conformance with USEPA recommendations, as applicable
- d. Indication if spill prevention plans and cleanup materials are provided at fueling station
- e. # of employees properly trained to respond to fuel spills

13. Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):

- a. Printout of current referenced USEPA BMP descriptions; and date(s) reviewed with employees; and # of employees reviewed with
- b. Description of respective fueling station; and list of current practices/ features at station and description of their conformance with USEPA recommendations
- c. Supporting documentation of status of additional BMP/ features investigation and implementation, as applicable
- d. Summary of implementation status of spill prevention plans and cleanup materials; and copy of spill prevention plan
- e. description of respective training, dates, and employee names

14. For Further BMP Guidance: Refer to "Municipal Vehicle Fueling" BMP (under USEPA MCM#6: Pollution Prevention/Good Housekeeping for Municipal Operations) on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations

“Pollution Prevention/Good Housekeeping (Operation and Maintenance) Program”: Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

1. **BMP#:** 20
2. **Permit Requirement:** Controls for reducing or eliminating the discharge of pollutants from: [Municipal properties and/or facilities &] maintenance and storage yards
3. **BMP Name (Permit Part III.A.1.a.):** Proper municipal vehicle and equipment maintenance
4. **BMP Description (Permit Part III.A.1.a.):** Common activities at municipal maintenance shops include parts cleaning, vehicle fluid replacement, and equipment replacement and repair. Automotive maintenance facilities are considered to be stormwater "hot spots." Hotspots are areas that generate significant loads of hydrocarbons, trace metals, and other pollutants that can affect the quality of stormwater. Some of the wastes generated at automobile maintenance facilities include: solvents (degreasers, paint thinners, etc.); and antifreeze; and brake fluid and brake pad dust; and battery acid; and motor oil; and fuel (gasoline, diesel, kerosene); and lubricating grease; and etc. Fluid spills and improper disposal of materials result in pollutants, heavy metals, and toxic materials entering ground and surface water supplies, which can create public health and environmental risks.

The City of Canton has two main municipal vehicle and equipment maintenance facilities (at Division of Motor Vehicles and Fire Station #1). Various BMPs are in place at each facility to discourage or prevent the possibility of illicit discharges into the MS4 as a result of municipal vehicle and equipment maintenance.

5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** BMP assists in satisfying Part III.B.6.d.iii.2.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **City Departments/Facilities with Significant Involvement:**
 - Division of Motor Vehicles
 - Fire Station (Fire Station #1)
8. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):**
 - Division of Motor Vehicles/Superintendent
 - Fire Department/Chief
9. **Agreement Needed for Implementation (Permit Part III.C.)?** No
10. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):**
 - a. Annually review referenced USEPA BMP descriptions with appropriate department/ facility employees (see item#14)
 - b. Identify current vehicle and equipment maintenance practices that are in conformance with USEPA recommendations
 - a. Identify any deficiencies in current practices and investigate corresponding BMPs to implement at respective maintenance garages to be in better conformance with USEPA recommendations
 - b. Ensure spill prevention plans and cleanup materials are readily available at each maintenance garage
 - c. Ensure appropriate employees are trained to properly respond to fuel spills
11. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
12. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.6.f.):**
 - a. Indication if referenced USEPA BMP descriptions were reviewed with appropriate department/ facility employees
 - b. Summary of current practices in conformance with USEPA recommendations

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- c. Summary of any deficiencies in current practices and corresponding status of investigation of additional BMPs to implement to be in better conformance with USEPA recommendations, as applicable
- d. Indication if spill prevention plans and cleanup materials are provided at maintenance facilities
- e. # of employees properly trained to respond to spills

13. Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):

- a. Printout of current referenced USEPA BMP descriptions; and date(s) reviewed with employees; and # of employees reviewed with
- b. List of current practices and description of their conformance with USEPA recommendations
- c. Supporting documentation of status of additional BMP investigation and implementation, as applicable
- d. Summary of implementation status of spill prevention plans and cleanup materials; and copy of spill prevention plan
- e. Description of respective training, dates, and employee names

14. For Further BMP Guidance: Refer to "Municipal Vehicle and Equipment Maintenance" BMP (under USEPA MCM#6: Pollution Prevention/Good Housekeeping for Municipal Operations) on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations

“Pollution Prevention/Good Housekeeping (Operation and Maintenance) Program”: Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

1. **BMP#:** 21
2. **Permit Requirement:** Controls for reducing or eliminating the discharge of pollutants from: [Municipal properties and/or facilities &] maintenance and storage yards
3. **BMP Name (Permit Part III.A.1.a.):** Proper municipal vehicle and equipment washing
4. **BMP Description (Permit Part III.A.1.a.):** Municipal vehicle washing can generate dry weather runoff contaminated with detergents, oils, grease, and heavy metals. Vehicle washing BMPs can eliminate contaminated wash water discharges to the storm sewer system. Such BMPs include installing wash racks that discharge wash water to the sanitary sewer, and contracting the services of commercial car washes, which are permitted to discharge wash water to the sanitary sewer system.

The City Service Center has 4 indoor vehicle washing bays (at Division of Motor Vehicles, Street Department, Parks Department, and Collection Systems (Sewer) Department). The City Water Reclamation Facility and Water Department also have indoor vehicle washing bays. All of these indoor bays have floor drains that connect to sanitary sewers.

The City Service Center has an outdoor wash area that is sometimes used by various departments to rinse off vehicles and equipment. In an attempt to reduce pollutant discharges into the adjacent storm sewer system, in 2007 the Street Department installed jersey barriers at the outdoor wash area just upstream from the adjacent catch basin that drains the area. In addition, hay bales are placed adjacent to the jersey barriers. The combination of the jersey barriers and hay bales slows down the wash runoff and helps to filter out large debris and floatables. Any smaller debris that enters the catch basin is treated by a water quality insert (see "Catch basins with water quality inserts" BMP).

All Fire Department vehicles are washed indoor at each station. The cleaning solution uses biodegradable surfactants, containing no soap or caustic agents.

The City annually contracts with local commercial car washes for washing of other City vehicles used by various departments, as necessary. All commercial car washes are required to have wash water treated via sanitary sewer.

5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** BMP assists in satisfying Part III.B.6.d.iii.2.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **City Departments/Facilities with Significant Involvement:**
 - Division of Motor Vehicles (indoor washing)
 - Street Department (indoor washing)
 - Street Department (outdoor washing)
 - Parks Department (indoor washing)
 - Collection Systems (Sewer) Department (indoor washing)
 - Water Reclamation Facility (indoor washing)
 - Water Department (indoor washing)
 - Fire Department (washing at all Fire Stations)
 - Various departments (washing at private car washes)
8. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):**
 - Division of Motor Vehicles (indoor washing)/Superintendent
 - Street Department (indoor washing)/Superintendent
 - Street Department (outdoor washing)/Superintendent
 - Parks Department (indoor washing)/Director

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- Collection Systems (Sewer) Department (indoor washing)/Superintendent
- Water Reclamation Facility (indoor washing)/Superintendent
- Water Department (indoor washing)/Superintendent
- Fire Department (washing at all Fire Stations)/Chief
- Various departments (washing at private car washes)/Service Director

9. Agreement Needed for Implementation (Permit Part III.C.)? No (except for washing at private car washes)

10. Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):

For DMV, Street Department, Parks Department, Collection Systems (Sewer) Department, Water Reclamation Facility, and Fire Department only:

- a. Annually review referenced USEPA BMP descriptions with appropriate department/ facility employees (see item#14)
- b. Identify current municipal vehicle and equipment washing practices/ features that are in conformance with USEPA recommendations
- c. Identify any deficiencies in current practices/ features and investigate corresponding BMPs/ features to implement at respective washing facilities to be in better conformance with USEPA recommendations

For Service Director only: Continue to annually contract with local car washes for washing of City vehicles.

11. Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.): Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations

12. Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.6.f.):

For DMV, Street Department, Parks Department, Collection Systems (Sewer) Department, Water Reclamation Facility, and Fire Department only:

- a. Indication if referenced USEPA BMP descriptions were reviewed with appropriate department/ facility employees
- b. Summary of current practices in conformance with USEPA recommendations
- c. Summary of any deficiencies in current practices and corresponding status of investigation of additional BMPs to implement to be in better conformance with USEPA recommendations, as applicable

For Service Director only: Indication if annual contract with commercial car washes is in place.

13. Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):

For DMV, Street Department, Parks Department, Collection Systems (Sewer) Department, Water Reclamation Facility, and Fire Department only:

- a. Printout of current referenced USEPA BMP descriptions; and date(s) reviewed with employees; and # of employees reviewed with
- b. List of current practices and description of their conformance with USEPA recommendations
- c. Supporting documentation of status of additional BMP investigation and implementation, as applicable

For Service Director only: Copy of contract

14. For Further BMP Guidance: Refer to "Municipal Vehicle and Equipment Washing" BMP (under USEPA MCM#6: Pollution Prevention/Good Housekeeping for Municipal Operations) on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations

“Pollution Prevention/Good Housekeeping (Operation and Maintenance) Program”: Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

1. **BMP#:** 22
2. **Permit Requirement:** Controls for reducing or eliminating the discharge of pollutants from: [Municipal properties and/or facilities &] maintenance and storage yards
3. **BMP Name (Permit Part III.A.1.a.):** Proper materials management
4. **BMP Description (Permit Part III.A.1.a.):** Responsible management of common chemicals, such as fertilizers, solvents, paints, cleaners, automotive products, and hazardous materials can significantly reduce polluted runoff. Such products must be handled properly in all stages of development, use, and disposal. Proper materials management entails the selection of the individual product, the correct use and storage of the product, the responsible disposal of associated waste(s), and the proper responses to spills. Proper materials management reduces the likelihood of accidental spills or releases of hazardous materials during storm or flooding events. In addition, health and safety conditions at the facility will improve.

Simple practices for proper materials management include improving maintenance of machinery; using drip pans for leaky containers or equipment until repairs can be made; establishing material storage and inventory controls (especially for hazardous materials); improving routine cleaning and inspection of facilities where materials are stored or processed; storing materials indoors or under roof; ensuring fueling areas are under roof; providing tarps for materials that must be kept outside; ensuring dumpsters have lids; maintaining organized workplaces; securing lids on containers; stacking containers in accordance with the manufacturers' directions to avoid damaging the container or the product itself; storing containers on pallets or equivalent structures (this facilitates inspection for leaks and prevents the containers from coming into contact with wet floors; and which can cause corrosion (this consideration also reduces the incidence of damage by pests); delegating the responsibility for management of hazardous materials to personnel trained and experienced in hazardous substance management; etc., and educating employees about the benefits of such practices.

5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** BMP assists in satisfying Part III.B.6.d.iii.2.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **City Departments/Facilities with Significant Involvement:**
 - Division of Motor Vehicles
 - Street Department
 - Parks Department
 - Collection Systems (Sewer) Department
 - Water Reclamation Facility
 - Fire Department
 - Engineering Department (Traffic Division: Signal; Sign & Paint; Parking)
 - Police Department (Impound Lot)
 - Recreation Department
 - Sanitation Department
 - Water Department
 - Building Maintenance Department
 - Civic Center
8. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):**
 - Division of Motor Vehicles/Superintendent
 - Street Department/Superintendent
 - Parks Department/Director

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- Collection Systems (Sewer) Department/Superintendent
- Water Reclamation Facility/Superintendent
- Fire Department/Chief
- Engineering Department (Traffic Division: Signal; Sign & Paint; Parking)/Assistant City Engineer
- Police Department (Impound Lot)/Lieutenant
- Recreation Department/Director
- Sanitation Department/Superintendent
- Water Department/Superintendent
- Building Maintenance Department/Superintendent
- Civic Center/Manager

9. Agreement Needed for Implementation (Permit Part III.C.)? No

10. Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):

- Annually review referenced USEPA BMP descriptions with appropriate department/ facility employees (see item#14)
- Identify current materials management practices that are in conformance with USEPA recommendations, as applicable
- Identify any deficiencies in current practices and investigate corresponding BMPs to implement to be in better conformance with USEPA recommendations
- Ensure spill prevention plans and cleanup materials are readily available at each department/ facility
- Ensure appropriate employees are trained to properly respond to spills

11. Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.): Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations

12. Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.6.f.):

- Indication if referenced USEPA BMP descriptions were reviewed with appropriate department/ facility employees
- Summary of current practices that are in conformance with USEPA recommendations
- Summary of any deficiencies in current practices and corresponding status of investigation of additional BMPs to implement to be in better conformance with USEPA recommendations, as applicable
- Indication if spill prevention plans and cleanup materials are provided at respective department/ facility
- # of employees properly trained to respond to spills

13. Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):

- Printout of current referenced USEPA BMP descriptions; and date(s) reviewed with employees; and # of employees reviewed with
- List of current practices and description of their conformance with USEPA recommendations
- Supporting documentation of status of additional BMP investigation and implementation, as applicable
- Summary of implementation status of spill prevention plans and cleanup materials; and copy of spill prevention plan
- Description of respective training, dates, and employee names

14. For Further BMP Guidance: Refer to "Materials Management", "Hazardous Materials Storage", "Municipal Facilities Management", and "Spill Response and Prevention" BMPs (under USEPA MCM#6: Pollution Prevention/Good Housekeeping for Municipal Operations) on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations

“Pollution Prevention/Good Housekeeping (Operation and Maintenance) Program”: Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

1. **BMP#:** 23
2. **Permit Requirement:** Controls for reducing or eliminating the discharge of pollutants from: [Municipal properties and/or facilities &] maintenance and storage yards
3. **BMP Name (Permit Part III.A.1.a.):** Catch basins with water quality inserts
4. **BMP Description (Permit Part III.A.1.a.):** In 2007, two Nyloplast Catch Basin Insert Storm Pure Infiltration Systems were installed at two critical storm sewer catch basin locations (downstream from the vehicle fuel pumps and the outdoor vehicle washout area) in the Service Center parking lot. These systems consist of features that capture sediment, debris, and tiny particles of hydrocarbons and oil-bound pollutants and therefore prevent or reduce such pollutants from discharging into the MS4 and ultimately into surface waters. The systems are inspected monthly and cleaned by the Street Department accordingly.
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** BMP assists in satisfying Part III.B.6.d.iii.2.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **City Departments/Facilities with Significant Involvement:** Street Department
8. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Street Department/Superintendent
9. **Agreement Needed for Implementation (Permit Part III.C.)?** No
10. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):**
 - a. Continue to utilize catch basins with water quality inserts at critical locations
 - b. Inspect such catch basins monthly and clean/ maintain as needed
11. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
12. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.6.f.):**
 - a. Indication if such catch basins are continually utilized at critical locations
 - b. Frequency of inspections and summary of associated maintenance
13. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):** Supporting documentation, as applicable
14. **For Further BMP Guidance:** Refer to "Manufactured Products for Stormwater Inlets" BMP (under USEPA MCM#6: Pollution Prevention/Good Housekeeping for Municipal Operations) on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations

“Pollution Prevention/Good Housekeeping (Operation and Maintenance) Program”: Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

1. **BMP#:** 24
2. **Permit Requirement:** Controls for reducing or eliminating the discharge of pollutants from: Fleet or maintenance shops with outdoor storage areas
3. **BMP Name (Permit Part III.A.1.a.):** Indoor storage areas for fleet maintenance garages
4. **BMP Description (Permit Part III.A.1.a.):** Due to the exposure to weather, fleet or maintenance shops with outdoor materials storage areas have a much higher likelihood of contributing to pollutant runoff than those with indoor storage areas only. The City of Canton owns/operates two fleet maintenance shops (garages). These garages are located at the Division of Motor Vehicles (at City Service Center: 2436 30th St NE, Canton, OH 44705) and at Fire Station #1 (at 110 7th St SW, Canton, OH 44702). However, neither of these maintenance garages store any materials outdoors. All fleet maintenance materials are stored indoor.
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** BMP assists in satisfying Part III.B.6.d.iii.2.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **City Departments/Facilities with Significant Involvement:**
 - Division of Motor Vehicles
 - Fire Department (Fire Station#1)
8. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):**
 - Division of Motor Vehicles/Superintendent
 - Fire Department/Chief
9. **Agreement Needed for Implementation (Permit Part III.C.)?** No
10. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):**
 - a. Annually review referenced USEPA BMP descriptions with appropriate department/ facility employees (see item#14)
 - b. Continue to store all respective respective fleet maintenance materials and equipment indoors
11. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
12. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.6.f.):**
 - a. Indication if referenced USEPA BMP descriptions were reviewed with appropriate department/ facility employees
 - b. Indication if all respective fleet maintenance materials and equipment are continually stored indoors
13. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):**
 - a. Printout of current referenced USEPA BMP descriptions; and date(s) reviewed with employees; and # of employees reviewed with
 - b. Supporting documentation, as applicable
14. **For Further BMP Guidance:** Refer to "Municipal Vehicle and Equipment Maintenance", "Materials Management", and "Hazardous Materials Storage" BMPs (under USEPA MCM#6: Pollution Prevention/Good Housekeeping for Municipal Operations) on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations

“Pollution Prevention/Good Housekeeping (Operation and Maintenance) Program”: Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

1. **BMP#:** 25
2. **Permit Requirement:** Controls for reducing or eliminating the discharge of pollutants from: Salt/sand storage locations
3. **BMP Name (Permit Part III.A.1.a.):** Proper storage of road salt
4. **BMP Description (Permit Part III.A.1.a.):** Many of the problems associated with contamination of local waterways stem from the improper storage of deicing materials. Salts are very soluble when they come into contact with stormwater. They can migrate into ground water used for public water supplies and also contaminate surface waters. The City of Canton has 6 salt domes of which 1 is inactive and another is utilized by ODOT. All salt utilized by the City is stored under roof in the salt domes.
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** BMP assists in satisfying Part III.B.6.d.iii.2.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **City Departments/Facilities with Significant Involvement:** Street Department
8. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Street Department/Superintendent
9. **Agreement Needed for Implementation (Permit Part III.C.)?** No
10. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):**
 - a. Annually review referenced USEPA BMP descriptions with appropriate department/ facility employees (see item#14)
 - b. Continue to store all de-icing salt in salt domes
11. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
12. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.6.f.):**
 - a. Indication if referenced USEPA BMP descriptions were reviewed with appropriate department/ facility employees
 - b. Indication if all de-icing salt is stored in salt domes
13. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):**
 - a. Printout of current referenced USEPA BMP descriptions; and date(s) reviewed with employees; and # of employees reviewed with
 - b. Supporting documentation, as applicable
14. **For Further BMP Guidance:** Refer to "Road Salt Application and Storage" and "Roadway and Bridge Maintenance" BMPs (under USEPA MCM#6: Pollution Prevention/Good Housekeeping for Municipal Operations) on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations

“Pollution Prevention/Good Housekeeping (Operation and Maintenance) Program”: Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

1. **BMP#:** 26
2. **Permit Requirement:** Controls for reducing or eliminating the discharge of pollutants from: Snow disposal areas
3. **BMP Name (Permit Part III.A.1.a.):** Proper disposal of snow
4. **BMP Description (Permit Part III.A.1.a.):** The City of Canton Street Department plows snow from City streets. Snow is typically plowed to the side of the streets. Upon heavier snowfalls, parking bans can be issued to make more room for plowed snow. In extremely rare circumstances, excess snow from downtown streets is transported to and disposed of at a City maintenance outpost where, after snow melt, remaining debris are swept up as needed.
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** BMP assists in satisfying Part III.B.6.d.iii.2.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **City Departments/Facilities with Significant Involvement:** Street Department
8. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Street Department/Superintendent
9. **Agreement Needed for Implementation (Permit Part III.C.)?** No
10. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):**
 - a. Annually review referenced USEPA BMP descriptions with appropriate department/ facility employees (see item#14)
 - b. Continue to dispose of snow as described
11. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
12. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.6.f.):**
 - a. Indication if referenced USEPA BMP descriptions were reviewed with appropriate department/ facility employees
 - b. Summary description of snow disposal practices; and indication if any snow was disposed at outposts and the corresponding practices used to control pollutant runoff, as applicable
13. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):**
 - a. Printout of current referenced USEPA BMP descriptions; and date(s) reviewed with employees; and # of employees reviewed with
 - b. Supporting documentation, as applicable
14. **For Further BMP Guidance:** Refer to "Road Salt Application and Storage", "Roadway and Bridge Maintenance", and "Parking Lot and Street Cleaning" BMPs (under USEPA MCM#6: Pollution Prevention/Good Housekeeping for Municipal Operations) on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations

“Pollution Prevention/Good Housekeeping (Operation and Maintenance) Program”: Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

1. **BMP#:** 27
2. **Permit Requirement:** Descriptions of materials used for roadway and municipal parking lot winterization (use of salt, sand, bottom ash, etc or a combination thereof), associated application rates, and the rationale for the selected application rates: Roadway
3. **BMP Name (Permit Part III.A.1.a.):** Proper winter materials management
4. **BMP Description (Permit Part III.A.1.a.):** The application and storage of deicing materials, most commonly salts such as sodium chloride, can lead to water quality problems for surrounding areas. Salts lower the melting point of ice, allowing roadways to stay free of ice buildup during cold winters. The City of Canton Street Department annually prepares a written "Snow & Ice Control Program" which describes the City's philosophy of addressing hazardous driving conditions created by winter weather and the means by which the City addresses snow and ice accumulation on City streets. The Snow & Ice Control Program describes rock salt as being a very effective chemical de-icer in temperatures above 20oF. To enhance the melting capability of rock salt, the City uses magnesium chloride or Geomelt at temperatures below 20oF. Application rates of treated rock salt are approximately 6 gallons per ton of rock salt.
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** BMP assists in satisfying Part III.B.6.d.iii.2.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **City Departments/Facilities with Significant Involvement:** Street Department
8. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Street Department/Superintendent
9. **Agreement Needed for Implementation (Permit Part III.C.)?** No
10. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):**
 - a. Annually review referenced USEPA BMP descriptions with appropriate department/ facility employees (see item#14)
 - b. Identify current de-icing/ anti-icing materials and application practices that are in conformance with USEPA recommendations
 - c. Identify any deficiencies in current de-icing/ anti-icing materials and/or practices and investigate corresponding materials BMPs to implement to be in better conformance with USEPA recommendations
 - d. Track the annual usage of de-icing/ anti-icing management materials and application rates
11. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
12. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.6.f.):**
 - a. Indication if referenced USEPA BMP descriptions were reviewed with appropriate department/ facility employees
 - b. Summary of current de-icing/ anti-icing materials and practices that are in conformance with USEPA recommendations
 - c. Summary of any deficiencies in current de-icing/ anti-icing materials and/or practices and corresponding status of investigation of additional materials and/or BMPs to implement to be in better conformance with USEPA recommendations, as applicable
 - d. Summary of annual usage of de-icing/ anti-icing materials, application rates, and rationale for rates
13. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):**
 - a. Printout of current referenced USEPA BMP descriptions; and date(s) reviewed with employees; and # of employees reviewed with

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- b. List of current de-icing/ anti-icing materials and practices and description of their conformance with USEPA recommendations
 - c. Supporting documentation of status of additional BMP investigation and implementation, as applicable
 - d. Supporting documentation, as applicable
- 14. For Further BMP Guidance:** Refer to "Road Salt Application and Storage" and "Roadway and Bridge Maintenance" BMPs (under USEPA MCM#6: Pollution Prevention/Good Housekeeping for Municipal Operations) on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations

“Pollution Prevention/Good Housekeeping (Operation and Maintenance) Program”: Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

1. **BMP#:** 28
2. **Permit Requirement:** Descriptions of materials used for roadway and municipal parking lot winterization (use of salt, sand, bottom ash, etc or a combination thereof), associated application rates, and the rationale for the selected application rates: Municipal parking lots
3. **BMP Name (Permit Part III.A.1.a.):** Proper winter materials management
4. **BMP Description (Permit Part III.A.1.a.):** The application and storage of de-icing materials, most commonly salts such as sodium chloride, can lead to water quality problems for surrounding areas. Salts lower the melting point of ice, allowing parking lots to stay free of ice buildup during cold winters. Municipal (City-owned) parking lots can be classified into 2 categories: those used for public parking (2 decks, 3 lots) and those used for City employee parking (various locations throughout City). All public-use parking lots are maintained by the Traffic: Parking Division of the City Engineering Department, while the maintenance of all City employee parking lots is typically the responsibility of the respective departments utilizing the lots. This maintenance includes snow-plowing and application of de-icing materials, as necessary. There are 5 City departments (Engineering, Park, Street, Water, WRF) that utilize trucks with spreaders for application of de-icing materials (typically salt) on municipal parking lots. Other department apply de-icing agents by hand, as necessary.
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** BMP assists in satisfying Part III.B.6.d.iii.2.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **City Departments/Facilities with Significant Involvement:**
 - Lots used for public parking:
 - Engineering Department (Traffic Division: Parking)
 - Lots used for City employee parking:
 - Park Department
 - Street Department
 - Water Department
 - Water Reclamation Facility
8. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):**
 - Lots used for public parking:
 - Engineering Department (Traffic Division: Parking)/Assistant City Engineer
 - Lots used for City employee parking:
 - Park Department/Director
 - Street Department/Superintendent
 - Water Department/Superintendent
 - Water Reclamation Facility/Superintendent
9. **Agreement Needed for Implementation (Permit Part III.C.)?** No
10. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):**
 - a. Annually review referenced USEPA BMP descriptions with appropriate department/ facility employees (see item#14)
 - b. Identify current de-icing/ anti-icing materials and application practices that are in conformance with USEPA recommendations
 - c. Identify any deficiencies in current de-icing/ anti-icing materials and/or practices and investigate corresponding materials BMPs to implement to be in better conformance with USEPA recommendations
 - d. Track the annual usage of de-icing/ anti-icing management materials and application rates
11. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations

12. Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.6.f.):

- a. Indication if referenced USEPA BMP descriptions were reviewed with appropriate department/facility employees
- b. Summary of current de-icing/ anti-icing materials and practices that are in conformance with USEPA recommendations
- c. Summary of any deficiencies in current de-icing/ anti-icing materials and/or practices and corresponding status of investigation of additional materials and/or BMPs to implement to be in better conformance with USEPA recommendations, as applicable
- d. Summary of annual usage of de-icing/ anti-icing materials, application rates, and rationale for rates

13. Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):

- a. Printout of current referenced USEPA BMP descriptions; and date(s) reviewed with employees; and # of employees reviewed with
- b. List of current de-icing/ anti-icing materials and practices and description of their conformance with USEPA recommendations
- c. Supporting documentation of status of additional BMP investigation and implementation, as applicable
- d. Supporting documentation, as applicable

14. For Further BMP Guidance: Refer to "Road Salt Application and Storage" and "Roadway and Bridge Maintenance" BMPs (under USEPA MCM#6: Pollution Prevention/Good Housekeeping for Municipal Operations) on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations

“Pollution Prevention/Good Housekeeping (Operation and Maintenance) Program”: Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

1. **BMP#:** 29
2. **Permit Requirement:** Controls or practices to be used for reducing or eliminating discharges of pollutants resulting from roadway and municipal parking lot winterization activities
3. **BMP Name (Permit Part III.A.1.a.):** Street sweeping
4. **BMP Description (Permit Part III.A.1.a.):** (Controls or practices to be used for reducing or eliminating discharges of pollutants resulting from roadway and municipal parking lot winterization activities are required per permit Part III.B.6.d.iii.2. The identified BMP is implemented by the City to assist in satisfying this permit requirement as well as others. See BMP#5 “Street sweeping” under MCM #6 for details.)
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** (See BMP Description)
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** (See BMP Description)
7. **City Departments/Facilities with Significant Involvement:** (See BMP Description)
8. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** (See BMP Description)
9. **Agreement Needed for Implementation (Permit Part III.C.):** (See BMP Description)
10. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):** (See BMP Description)
11. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** (See BMP Description)
12. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.6.f.):** (See BMP Description)
13. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):** (See BMP Description)
14. **For Further BMP Guidance:** (See BMP Description)

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Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations

“Pollution Prevention/Good Housekeeping (Operation and Maintenance) Program”: Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

1. **BMP#:** 30
2. **Permit Requirement:** Controls or practices to be used for reducing or eliminating discharges of pollutants resulting from roadway and municipal parking lot winterization activities
3. **BMP Name (Permit Part III.A.1.a.):** Lot sweeping
4. **BMP Description (Permit Part III.A.1.a.):** (Controls or practices to be used for reducing or eliminating discharges of pollutants resulting from roadway and municipal parking lot winterization activities are required per permit Part III.B.6.d.iii.2. The identified BMP is implemented by the City to assist in satisfying this permit requirement as well as others. See BMP#6 “Lot sweeping” under MCM #6 for details.)
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** (See BMP Description)
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** (See BMP Description)
7. **City Departments/Facilities with Significant Involvement:** (See BMP Description)
8. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** (See BMP Description)
9. **Agreement Needed for Implementation (Permit Part III.C.):** (See BMP Description)
10. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):** (See BMP Description)
11. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** (See BMP Description)
12. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.6.f.):** (See BMP Description)
13. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):** (See BMP Description)
14. **For Further BMP Guidance:** (See BMP Description)

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Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations

“Pollution Prevention/Good Housekeeping (Operation and Maintenance) Program”: Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

1. **BMP#:** 31
2. **Permit Requirement:** Controls or practices to be used for reducing or eliminating discharges of pollutants resulting from roadway and municipal parking lot winterization activities
3. **BMP Name (Permit Part III.A.1.a.):** Proper storage of road salt
4. **BMP Description (Permit Part III.A.1.a.):** (Controls or practices to be used for reducing or eliminating discharges of pollutants resulting from roadway and municipal parking lot winterization activities are required per permit Part III.B.6.d.iii.2. The identified BMP is implemented by the City to assist in satisfying this permit requirement as well as others. See BMP#25 “Proper storage of road salt” under MCM #6 for details.)
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** (See BMP Description)
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** (See BMP Description)
7. **City Departments/Facilities with Significant Involvement:** (See BMP Description)
8. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** (See BMP Description)
9. **Agreement Needed for Implementation (Permit Part III.C.)?** (See BMP Description)
10. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):** (See BMP Description)
11. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** (See BMP Description)
12. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.6.f.):** (See BMP Description)
13. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):** (See BMP Description)
14. **For Further BMP Guidance:** (See BMP Description)

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Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations

“Pollution Prevention/Good Housekeeping (Operation and Maintenance) Program”: Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

1. **BMP#:** 32
2. **Permit Requirement:** Controls or practices to be used for reducing or eliminating discharges of pollutants resulting from roadway and municipal parking lot winterization activities
3. **BMP Name (Permit Part III.A.1.a.):** Proper disposal of snow
4. **BMP Description (Permit Part III.A.1.a.):** (Controls or practices to be used for reducing or eliminating discharges of pollutants resulting from roadway and municipal parking lot winterization activities are required per permit Part III.B.6.d.iii.2. The identified BMP is implemented by the City to assist in satisfying this permit requirement as well as others. See BMP#26 “Proper disposal of snow” under MCM #6 for details.)
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** (See BMP Description)
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** (See BMP Description)
7. **City Departments/Facilities with Significant Involvement:** (See BMP Description)
8. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** (See BMP Description)
9. **Agreement Needed for Implementation (Permit Part III.C.)?** (See BMP Description)
10. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):** (See BMP Description)
11. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** (See BMP Description)
12. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.6.f.):** (See BMP Description)
13. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):** (See BMP Description)
14. **For Further BMP Guidance:** (See BMP Description)

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Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations

“Pollution Prevention/Good Housekeeping (Operation and Maintenance) Program”: Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

1. **BMP#:** 33
2. **Permit Requirement:** Controls or practices to be used for reducing or eliminating discharges of pollutants resulting from roadway and municipal parking lot winterization activities
3. **BMP Name (Permit Part III.A.1.a.):** Proper winter materials management
4. **BMP Description (Permit Part III.A.1.a.):** (Controls or practices to be used for reducing or eliminating discharges of pollutants resulting from roadway and municipal parking lot winterization activities are required per permit Part III.B.6.d.iii.2. The identified BMP is implemented by the City to assist in satisfying this permit requirement as well as others. See BMP#27 “Proper winter materials management” under MCM #6 for details.)
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** (See BMP Description)
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** (See BMP Description)
7. **City Departments/Facilities with Significant Involvement:** (See BMP Description)
8. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** (See BMP Description)
9. **Agreement Needed for Implementation (Permit Part III.C.):** (See BMP Description)
10. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):** (See BMP Description)
11. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** (See BMP Description)
12. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.6.f.):** (See BMP Description)
13. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):** (See BMP Description)
14. **For Further BMP Guidance:** (See BMP Description)

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Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations

“Pollution Prevention/Good Housekeeping (Operation and Maintenance) Program”: Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

1. **BMP#:** 34
2. **Permit Requirement:** Procedures for the proper disposal of waste removed from: Municipal operations
3. **BMP Name (Permit Part III.A.1.a.):** Proper disposal of street sweepings
4. **BMP Description (Permit Part III.A.1.a.):** The City identifies that street sweeping is a municipal operation in which waste is removed and requires procedures for proper disposal. Street sweepings are considered by Ohio EPA to be "solid wastes". Therefore, proper disposal of street sweepings is crucial to meeting permit requirements and expectations of Ohio EPA. The City of Canton takes street sweepings to a local waste transfer station for proper disposal.
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** BMP assists in satisfying Part III.B.6.d.iii.3.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **City Departments/Facilities with Significant Involvement:** Street Department
8. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Street Department/Superintendent
9. **Agreement Needed for Implementation (Permit Part III.C.)?** No
10. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):**
 - a. Annually review referenced USEPA BMP descriptions with appropriate department/ facility employees (see item#14)
 - b. Continue to dispose of wastes resulting from street sweeping as described until further notice requires other procedures
11. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
12. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.6.f.):**
 - a. Indication if referenced USEPA BMP descriptions were reviewed with appropriate department/ facility employees
 - b. Indication if street sweepings are properly disposed of in accordance with EPA solid waste requirements; and summary of waste disposed
13. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):**
 - a. Printout of current referenced USEPA BMP descriptions; and date(s) reviewed with employees; and # of employees reviewed with
 - b. Supporting documentation, as applicable
14. **For Further BMP Guidance:** Refer to "Parking Lot and Street Cleaning" BMP (under USEPA MCM#6: Pollution Prevention/Good Housekeeping for Municipal Operations) on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations

“Pollution Prevention/Good Housekeeping (Operation and Maintenance) Program”: Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

1. **BMP#:** 35
2. **Permit Requirement:** Procedures for the proper disposal of waste removed from: The MS4 (including dredge spoil, accumulated sediments, floatables, and other debris)
3. **BMP Name (Permit Part III.A.1.a.):** Proper disposal of MS4 wastes
4. **BMP Description (Permit Part III.A.1.a.):** The City identifies that typical waste removed from the MS4 results from practices such as storm line cleaning (including catch basins and manholes) and roadside ditching. Material removed from storm line cleaning is considered by EPA to be "solid waste". Therefore, proper disposal such material is crucial to meeting permit requirements and expectations of Ohio EPA. The City temporarily places materials from storm line cleaning on a dewatering slab that drains to sanitary sewer. After dewatering, the remaining waste is then taken to a landfill. Material removed from roadside ditching typically consists of accumulated sediments (assuming no street sweepings or trash are mixed in), and are not considered by EPA to be solid waste. Sometimes this material is disposed on sight if conditions are favorable such that the material will not wash back into the ditch. In other cases it is taken to a fill location.
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** BMP assists in satisfying Part III.B.6.d.iii.3.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **City Departments/Facilities with Significant Involvement:** Collection Systems (Sewer) Department
8. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Collection Systems (Sewer) Department/Superintendent
9. **Agreement Needed for Implementation (Permit Part III.C.)?** No
10. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):**
 - a. Annually review referenced USEPA BMP descriptions with appropriate department/ facility employees (see item#14)
 - b. Continue to dispose of wastes removed from the MS4 as described until further notice requires other procedures
11. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
12. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.6.f.):**
 - a. Indication if referenced USEPA BMP descriptions were reviewed with appropriate department/ facility employees
 - b. Indication if MS4 wastes are properly disposed of as described; and summary of waste disposed
13. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):**
 - a. Printout of current referenced USEPA BMP descriptions; and date(s) reviewed with employees; and # of employees reviewed with
 - b. Supporting documentation, as applicable
14. **For Further BMP Guidance:** Refer to "Storm Drain System Cleaning" BMP (under USEPA MCM#6: Pollution Prevention/Good Housekeeping for Municipal Operations) on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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Minimum Control Measure (MCM) #6: Pollution Prevention/Good Housekeeping for Municipal Operations

“Pollution Prevention/Good Housekeeping (Operation and Maintenance) Program”: Best Management Practices (BMPs)/Requirements used to Satisfy MCM Requirements

1. **BMP#:** 36
2. **Permit Requirement:** Procedures to ensure that new flood management projects are assessed for impacts on water quality and current projects are assessed for incorporation of additional water quality protection devices or practices
3. **BMP Name (Permit Part III.A.1.a.):** Water quality considerations for flood management projects
4. **BMP Description (Permit Part III.A.1.a.):** Any public "flood management projects" that occur in the City of Canton are coordinated through the City Engineering Department. In cooperation with NPDES storm water permitting requirements, qualifying land disturbances (including flood management projects) of one acre or more in the City are assessed for proper water quality practices (See MCM #4 and MCM #5). The Engineering Department has staff that are trained in storm water quantity and quality management. Water quality practices are therefore ensured to be incorporated into all applicable new and redevelopment projects. The incorporation of water quality protection devices or practices on current sites/projects are to be evaluated on a case-by-case basis.
5. **Rationale for BMP Selection (Permit Part III.A.1.e.):** BMP assists in satisfying Part III.B.6.d.iii.4.
6. **Does MS4 Operator have Legal Authority to Implement BMP/Requirement (Permit Part III.A.1.b.)?** Yes
7. **City Departments/Facilities with Significant Involvement:** Engineering Department
8. **Entity/Position Responsible for Implementation (Permit Part III.A.1.d.):** Engineering Department/City Engineer
9. **Agreement Needed for Implementation (Permit Part III.C.)?** No
10. **Measurable Goal(s) for Each Responsible Position/Entity (Permit Part III.A.1.c.):** Continue to implement required procedures as necessary; and identify any applicable new or current flood management projects in which water quality impacts are assessed for water quality protection devices or practices
11. **Rationale for Measurable Goal(s) Selection (Permit Part III.A.1.e.):** Stated goals are easily measurable and/or demand indication if BMP implementation is in accordance with permit expectations
12. **Information for Responsible Position/Entity to Document for Annual Reports (Permit Part III.B.6.f.):** Summary of any applicable new or current flood management projects in which water quality impacts are assessed for water quality protection devices or practices
13. **Information for Responsible Position/Entity to Maintain for Audits (Permit Part IV.B.&C.):** Supporting documentation, as applicable
14. **For Further BMP Guidance:** Refer to "Ordinances for Post-Construction Runoff" BMP (under USEPA MCM#6: Pollution Prevention/Good Housekeeping for Municipal Operations) on USEPA's National Menu of Best Management Practices Website at <http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm>.

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