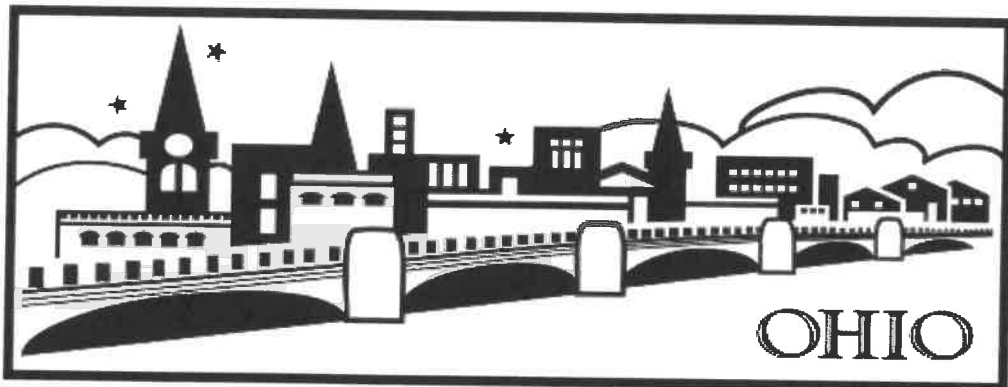


CITY OF FREMONT, OHIO  
STORM WATER MANAGEMENT PROGRAM

JUNE 2017



FREMONT

*Where People Come First.*®

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## List of Acronyms

In the preparation of this document, the following acronyms have been used:

BMP	Best Management Practices
EPA	Environmental Protection Agency
GIS	Geographical Information System
MCM	Minimum Control Measure
MOU	Memorandum of Understanding
MS4	Municipal Separate Storm Sewer System
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
SWMP	Storm Water Management Program
SWP3	Storm Water Pollution Prevention Plan
TMDL	Total Maximum Daily Load
TSS	Total Suspended Solids
WAU	Watershed Assessment Unit

## Executive Summary

The City of Fremont is required to develop and implement a Storm Water Management Program that satisfies the appropriate water quality requirements of Ohio Revised Code (ORC) 6111 and the Clean Water Act. This document must identify and describe the best management practices (BMPs) the City of Fremont has selected to address the six MCMs in the permit, why those particular BMPs were selected by the City in light of local water quality issues, and performance standards for BMP implementation. The six MCMs are:

1. Public Education and Outreach on Storm Water Impacts
2. Public Involvement/ Participation
3. Illicit Discharge Detection and Elimination
4. Construction Site Storm Water Runoff Control
5. Post-Construction Storm Water Management in New Development and Redevelopment
6. Pollution Prevention/Good Housekeeping for Municipal Operations

NPDES Small MS4 general permit #OHQ000003 requires that where applicable, BMPs shall be selected to address U.S. EPA approved TMDL recommendations for identified water quality problems associated with MS4 discharges within The City of Fremont's watershed(s). The plan also identifies the City's legal authority to implement the requirements of the OEPA's general permit.

## Legal Authorities to Implement the Storm Water Management Program

The City of Fremont has the legal authority to implement the following Storm Water Management Program under Article XVIII, Section 3 of the Ohio Constitution granting municipalities the authority to adopt land use and control measures for promoting the peace, health, safety and general welfare of their citizens.

## Financial Authorities to Implement the Storm Water Management Program

The City of Fremont will fund the additional activities necessary to implement its SWMP through dollars from the general fund. Periodically, The City of Fremont will evaluate the SWMP and, if necessary, suggest alternative funding arrangements.

## Overview of Community Storm Water System and TMDLs

The City of Fremont's SWMP covers all areas within the City's incorporated areas which covers an area of approximately 8.3 square miles. The population of Fremont, according to the 2010 census, is 16,734 with a population density of approximately 2,005 people per square mile. The City is located in the Sandusky River (lower) Watershed in the Muskellunge Creek-Sandusky River subwatershed (04100011 13). Sewers are mostly combined south of the Route 20 by-pass and any storm sewers are located mainly in residential areas with the exception of the Kessler Industrial Park. North of the Route 20 by-pass all sewers are separated and the area is mostly commercial and industrial.

The Sandusky River (lower and Bay tributaries) Watershed Total Maximum Daily Load (TMDL) report was approved by U.S. EPA on August 11, 2014. TMDL reports identify and evaluate water quality problems in impaired waterbodies and propose solutions to bring those waters into attainment with water quality standards. TMDLs were calculated for total phosphorus, nitrate plus nitrite, total suspended solids and bacteria.

The OEPA has completed the 2016 Ohio Integrated Water Quality Monitoring and Assessment Report and Fremont is included in three WAUs: Muskellunge Creek (04100011 13 01), Indian Creek-Sandusky River (04100011 13 02), and Mouth Sandusky River (04100011 13 03).

### Muskellunge Creek (04100011 13 01)

The results of the OEPA 2016 Integrated Report indicated that impairment of this WAU is due to bacteria, sedimentation/siltation, phosphorus (total) and nutrient/eutrophication biological indicators. The report states these impairments are due to crop production with subsurface drainage. The report does not list these sources as attributable to urban runoff/storm sewers.

### Indian Creek-Sandusky River (04100011 13 02)

The results of the OEPA 2016 Integrated Report indicated that impairment of this WAU is due to bacteria. The report does not list this source as attributable to urban runoff/storm sewers.

### Mouth Sandusky River (04100011 13 03)

The results of the OEPA 2016 Integrated Report indicated that impairment of this WAU is due to particle distribution (embeddedness), sedimentation/siltation, phosphorus (total), nutrient/eutrophication biological indicators and direct habitat alterations. The report states these impairments are due to channelization, sewage discharges in unsewered areas and crop production with subsurface drainage. The report does not list these sources as attributable to urban runoff/storm sewers.

Although the Integrated Report does not indicate that impairment is due to runoff/storm sewers the City will select BMPs that address the reasons for impairment to the best of its ability when addressing the six Minimum Control Measures (MCMs).

## Program Development and Decision Process

The City of Fremont is in the process of establishing its initial Storm Water Management Program. This document outlines this effort. The coordination of this effort and the overall implementation of the program is the responsibility of the City's Safety Service Director. Specific activities within the program will be coordinated by various department heads and those assignments will be discussed throughout this document.

In order for the City to have a successful SWMP it must first map and evaluate the storm water sewer system. There is currently an ongoing effort to establish a GIS of the City's assets which will include the storm water sewer system. When the storm water sewer system has been identified, a comprehensive evaluation of the system will be conducted that will include field surveys. These activities should be concluded by December 31, 2019.

The City must also establish the appropriate legal mechanisms for guidance and enforcement of the SWMP. This is discussed in more detail in various sections of this document and should be completed by December 31, 2019.

A kick off meeting will be scheduled September 2017 with City personnel, the WSOS Sandusky River Watershed Coalition, Sandusky County Soil and Water Conservation Office, Sandusky County Engineer and Sanitary Engineer and the Sandusky County Solid Waste/Recycling Office and any other interested parties. A memorandum of understanding will need to be developed with WSOS and the County Offices. At the kick off meeting the group will decide and assign specific responsibilities for fulfilling the requirements of the SWMP. After the initial kick off meeting the plan is to hold a meeting once a year in February. Memorandums of understanding will be obtained from the various participating groups after the initial kick off meeting. As program development progresses updates will be made to the SWMP and will be submitted with the Annual Report.

Following is a description of the six MCMs and how the City envisions initially addressing each one.

## MCM #1: Public Education and Outreach on Storm Water Impacts

Coordination of the Public Education Program will be the responsibility of the City of Fremont Water Reclamation Center. The Superintendent of this department will be the main contact. This choice was made due to the fact that this department already has several educational programs in place and has contacts with area schools, the Sandusky River Watershed Coalition and the Soil and Water Conservation District. Existing educational programs already touch on the impacts residents can have on storm water discharges and the plan is to expand on that base.

Target groups for the education program will be school age children, homeowners, the construction industry in the City and the general public.

Delivery mechanisms will include the City Website, distribution of brochures, posters, event booths and educational programs.

### Themes or Messages

The themes or messages that will be addressed are as follows:

1. Storm sewers and storm water catch basins are only for storm water.
2. Proper disposal of pet wastes.
3. Proper disposal of yard wastes.
4. Proper application of pesticides and fertilizers.
5. Control of runoff from construction activities.

The following will explain these activities in more detail:

#### 1. Storm sewers and storm water catch basins are only for storm water

This message will attempt to inform the public that storm sewers are only for storm water runoff. It will address illicit discharges and provide citizens with information for proper disposal of items that could end up in storm sewers such as old chemicals or used oil.

TMDL Addressed: TMDLS developed for the Sandusky River that are addressed by this message are total phosphorus, nitrate plus nitrite and bacteria. This message will help prevent dumping of waste fertilizer. It will also address the issue of cross connections.

Target Audience: School age children, homeowners, business owners, construction industry and the general public.

#### 2. Proper Disposal of Pet Wastes

This message will inform the public of proper ways to dispose of pet wastes.

TMDLs Addressed: TMDLs developed for the Sandusky River that are addressed by this message are total phosphorus, nitrate plus nitrite and bacteria.

Target Audience: Pet owners

### 3. Proper Disposal of Yard Wastes

This message will educate homeowners and the general public of the proper way to dispose of yard waste so these wastes do not end up in streams and storm sewers. It will educate homeowners on composting methods and inform them of City yard waste pick-ups and drop offs. Currently the City coordinates a free brush drop off twice a year at a local composting facility and has a leaf pick up in the fall. This program will expand on the existing services to help educate homeowners that debris should not be put in streets where it can be washed into storm sewers during rain events.

TMDLs Addressed: TMDLs developed for the Sandusky River that are addressed by this message are total phosphorus, nitrate plus nitrite and total suspended solids.

Target Audience: Homeowners and general public

### 4. Proper application of pesticides and fertilizers

This message will educate homeowners and the general public on the proper use of pesticides and fertilizers as well as offer alternatives to chemical pesticides and fertilizers.

TMDLs Addressed: TMDLs developed for the Sandusky River that are addressed by this message are total phosphorus and nitrate plus nitrite.

Target Audience: Homeowners and general public

### 5. Control of runoff from construction activities

This message will educate the construction industry about local and state regulations that are required to meet storm water regulations. It will also offer information on management practices that prevent construction site runoff from entering storm sewers and surface waters.

TMDLs Addressed: Total suspended solids

Target Audience: Construction Industry and Developers

## Delivery Mechanisms and Implementation Schedules

1. Exploring Your Backyard is an educational event coordinated by the Soil and Water Conservation District that occurs every fall at the County Fairgrounds. Area fourth graders attend this daylong event and learn about various topics such as agriculture and the environment. The Chemist for the City's Water Reclamation Center



participates in this event and presents a program on water that includes information about storm water. Information is presented with an oral presentation with visual aids, posters and audience participation.

Messages Delivered: The following messages will be delivered at this event from the list above: 1, 2

Implementation Schedule: This program has been going on for over ten years and will continue every fall.

Measurable Goal: Records will be kept of the number of students reached

2. The Water Reclamation Center's Laboratory Technician has developed a program for elementary age school children. It is an oral presentation with audience participation that covers the water cycle, wastewater treatment and pollution prevention which includes information on storm drains and sewers to ensure storm water runoff stays clean. 286 students plus faculty were reached in 2017

Messages Delivered: The following messages will be delivered at this event from the list above: 1, 2

Implementation Schedule: This program was started in May of 2017 and it is anticipated it will be an annual event. One grade school per year will be visited.

Measurable Goal: Records will be kept of the number of students reached

3. Inserts will be included in billing mailings that will contain information about storm water education. At a minimum, one insert per year will be distributed to water and sewer customers.

Messages Delivered: The following messages will be delivered at this event from the list above: 1, 2, 3, 4

Implementation Schedule: This activity will begin in 2018

Measurable Goal: 100 % of water and sewer customers will be reached

4. The City's website will be modified to include information on the City's Storm Water Management Program. Awareness of the website and information to be found there will be included in utility billing inserts and brochures and event booths.

Messages Delivered: The following messages will be delivered by this mechanism from the list above: 1, 2, 3, 4, 5

**Implementation Schedule:** This activity will begin in 2018

**Measurable Goal:** Website traffic will be monitored

5. Information will be available at a booth at the annual Home and Garden Show held every spring at the City's Recreation Center.

**Messages Delivered:** The following messages will be delivered at this event from the list above: 1, 2, 3, 4, 5

**Implementation Schedule:** This activity will begin in 2018

**Measurable Goal:** The number of attendees will be monitored

6. Information will be available at a booth at the annual County Fair held at the Sandusky County Fairgrounds located in Fremont, Ohio.

**Messages Delivered:** The following messages will be delivered at this event from the list above: 1, 2, 3, 4, 5

**Implementation Schedule:** This activity will begin no later than 2019

**Measurable Goal:** The number of attendees will be monitored

7. Brochures will be made available for distribution at the City's Utility Billing Office and City Engineer's Office that cover topics of the SWMP.

**Messages Delivered:** The following messages will be delivered by this mechanism from the list above: 1, 2, 3, 4, 5

**Implementation Schedule:** This activity will begin no later than 2019

**Measurable Goal:** The number of brochures distributed will be monitored.

The City will initially implement the listed activities and monitor their success. The program will be modified as needed to ensure its effectiveness. The City will also utilize new opportunities to educate the community of storm water issues if any become available.

## MCM # 2: Public Involvement/ Participation

The person responsible for coordinating this MCM will be the City's Safety Service Director. This MCM will be addressed initially by holding a kick-off meeting to be scheduled in September 2017 with City personnel, the WSOS Sandusky River Watershed Coalition, Sandusky County Soil and Water Conservation Office and the Sandusky County Solid Waste/Recycling Office and any other interested parties. This meeting will be open to the general public. A memorandum of understanding will need to be developed with WSOS and the County Agencies. At the kick off meeting the group will decide and assign specific responsibilities for fulfilling the requirements of the SWMP. After the initial kick-off meeting the plan is to hold meeting once per year in February.

The kickoff meeting will be posted on the City's website as well as being announced during City Council Meetings. Direct contact will be made with organizations such as the Sandusky River Watershed Coalition, Sandusky County Water and Soil Conservation District and Sandusky County Solid Waste/Recycling Office.

Activities for this MCM will include the following:

1. Initial Kick-off Meeting and Annual Meeting – This event will be coordinated by the City's Safety Service Director and will be open to all City residents. Participation will be measured by attendance records. Minutes of the meeting will be submitted with the annual report.
2. Household Hazardous Waste Collection – Currently being held twice per year in the spring and fall. This event is held by the Sandusky County Solid Waste/Recycling Office. This activity targets all county residents. Records of participation are kept for these events and will be included in the annual report.
3. River Cleanup - A river cleanup will be organized to clean the banks of the downtown area of the Sandusky River after the fishing activity of the walleye and white bass runs. This activity will be organized with the Sandusky River Watershed Coalition along with other interested organizations. Details of this event will be discussed during the kick-off meeting and it is anticipated that the first event will take place in 2019.
4. Storm Drain Stenciling – Local Boy Scout Troops will be contacted for participation in this activity. The Compliance Control Chemist at the Fremont Water Reclamation Center is very active in local Scouting and will coordinate this effort. It is anticipated that this activity will be an annual event starting in 2019 and continue until all catch basins are marked. Participation and number of catch basins marked will be reported in the annual report.

5. **Yard Refuse drop-off and Pick-up** – The city currently offers a brush drop off/pick-up and leaf pick-up program that City residents can participate in. The leaf collection event occurs every fall and takes approximately six weeks to complete. Residents are instructed to not put leaves in the street where they could be washed into storm drains in a rain event prior to pick-up. The brush drop off event occurs every spring and occurs for four hours on a Saturday with five additional days scheduled throughout the spring and summer. Brush is dropped off at a local composting facility and records are kept of number of loads disposed. During the second week of September there is a brush pick up by the Street Department. Residents are instructed to not put brush in the street where it could be washed into storm drains in a rain event prior to pick-up. The leaf and brush drop off and pick up programs are the responsibility of the Street Department Superintendent. Records are kept of volume of leaves and brush collected, fuel and manpower utilized. The public is notified of these events with inserts in utility bills, notification on the website, a press release as well as on the Mayor’s City Facebook page.

### MCM # 3: Illicit Discharge Detection and Elimination

The implementation of this MCM will be the responsibility of the City's Safety Service Director in conjunction with the City Engineer and Water Reclamation Center Superintendent and City Law Director.

The first order of business will be for the Law Director to develop an ordinance to prohibit illicit discharges to the City's MS4. The ordinance will include any exclusions that are allowed as listed in the MS4 general permit as well as any authorized occasional incidental non-storm water discharges. The ordinance will also give the City authorization to access private property to conduct IDDE investigations as well as contain provisions for enforcement mechanisms to eliminate illicit discharges. It is anticipated that the ordinance can be developed, passed by council and in force by December 31, 2019.

The City is developing a Geographical Information System (GIS) of its assets. A GIS map of the City's storm sewers will be developed by the end of 2018. A more detailed map including catch basins, pipes, ditches, flood control facilities and both public and private post-construction water quality practices will be developed by the end of 2020. The City's Engineering Department will be responsible for developing the GIS map as well as maintaining it and keeping it up to date on an annual basis. Once the map has been established and dry weather inspections have been conducted a layer will be added that identifies locations with dry weather flows and any other identified problem areas.

At the conclusion of the initial development of the storm sewer system map in 2019 the City will conduct field surveys of the system. The survey will be coordinated by the Engineering Department in conjunction with the Water Reclamation Center. Outfalls will be mapped and any dry weather flows will be noted as well as any adverse conditions such as stream bank erosion. Photographs of outfalls and stream conditions will be taken. Samples will be taken of any dry weather flow and analyses will be conducted in an effort to determine the source. Personnel from the Water Reclamation Center are experienced in sample collection, preservation and analysis. Dyeing of flows may also be utilized in an effort to identify illicit connections and the source of dry weather flows. Dry weather inspections will be conducted on an annual basis and the results will be recorded and tracked and noted in the annual report.

Following development of the GIS map and field survey, drainage basins will be prioritized based on the likelihood of illicit connections and/or storm runoff with higher quantities of pollutants. This activity will occur during 2020 during development of the detailed GIS map and will be the responsibility of the City's Engineering Department.

In 2019 the City will conduct a training session with the City's service departments (Streets, Parks, Water and Sewer Maintenance) on how to recognize illicit discharges. Any reports of illicit discharges by City personnel or citizens will be investigated by the Engineering Department with aid from the Water Reclamation Center.

## MCM # 4: Construction Site Storm Water Runoff Control

The City Engineer will be responsible for the implementation of this MCM and its requirements such as issuing permits, reviewing Storm Water Pollution Prevention Plans (SWP3), inspections and recommending enforcement action to the Safety Service Director.

An ordinance shall be developed by the City's Law Director and passed by City Council by December 31, 2019 that meets or exceeds requirements set forth in the Ohio EPA NPDES General Storm Water Permit for Storm Water Discharges Associated With Construction Activity OHC000004. An ordinance was chosen as the regulatory mechanism as ordinances are an established regulatory and enforcement procedure in the City. The ordinance will include:

- Requirements for construction site erosion and sediment control.
- Requirements for control of construction waste that may have adverse impacts on water quality.
- Submission of a SWP3.
- Enforcement mechanism to ensure compliance with the requirements of the ordinance.

At a minimum the following BMPs will be established:

1. Information will be available on the City's website detailing the construction site runoff control program. Coordination of this BMP will be the responsibility of the City Engineer in conjunction with the website administrator. Information available will include requirements for pre-construction, construction and post construction activities. Also, BMPs on reducing construction site impacts on water quality. A mechanism will be available for the public to submit comments to the City Administration. The implementation of this BMP will begin in July of 2018 with more detailed information becoming available after the GIS map is established and the ordinance for construction site runoff is passed by Council. The effectiveness of this BMP will be measured by monitoring website traffic.
2. Review of a SWP3 will be conducted prior to all construction activity for sites greater than 1 acre. Review of SWP3s will be the responsibility of the City Engineer. The City Engineer may require a SWP3 be submitted for smaller construction sites at his discretion based on the potential for adverse impacts on water quality due to site runoff. The City Engineer may also require a pre-construction meeting with the developer, engineer and contractor prior to any soil disturbing activity at the site. A record will be kept of all submitted SWP3s as well as all meetings held. The City Engineer will issue SWP3 approval. This BMP will be implemented by July 2020 or within six months of the passage of the construction site runoff control ordinance by Council.
3. Inspection of construction sites will be the responsibility of the City Engineer's Office. All sites will be inspected prior to any construction or soil disturbing activity with

monthly follow-up inspections at a minimum. More frequent inspections may occur based on the potential for adverse impacts to water quality from site runoff. Sites will be prioritized based on information that is gathered during the development of the GIS maps and field surveys of the storm water system and the potential for adverse impacts on water quality from specific sites. Inspections will ensure compliance with the submitted and approved SWP3. This BMP will be implemented by July 2020 or within six months of the passage of the construction site runoff control ordinance by Council.

## MCM # 5: Post-Construction Storm Water Management in New Development and Redevelopment

The City Engineer will be responsible for the implementation of this MCM and its requirements and for recommending when enforcement action should take place to the Safety Service Director.

An ordinance shall be developed by the City's Law Director and passed by City Council by December 31, 2019 that meets or exceeds requirements set forth in the Ohio EPA NPDES General Storm Water Permit for Storm Water Discharges Associated with Construction Activity OHC000004. An ordinance was chosen as the regulatory mechanism as ordinances are an established regulatory and enforcement procedure in the City. The ordinance will include:

- Requirements to ensure adequate long-term operation and maintenance of BMPs.

At a minimum the following BMPs will be established:

1. Information will be available on the City's website detailing the Post Construction Storm Water Management in New Development and Redevelopment Program. Coordination of this BMP will be the responsibility of the City Engineer in conjunction with the website administrator. Information available will include a combination of structural and non-structural BMPs. The implementation of this BMP will begin in July of 2018 with more detailed information becoming available after the GIS map is established and the ordinance for Post Construction Storm Water Management in New Development and Redevelopment Runoff Control is passed by Council. The effectiveness of this BMP will be measured by monitoring website traffic.
2. Review of a SWP3 will be conducted prior to all construction activity for sites greater than 1 acre. Review of SWP3s will be the responsibility of the City Engineer. The City Engineer may require a SWP3 be submitted for smaller construction sites at his discretion based on the potential for adverse impacts on water quality due to site runoff. A record will be kept of all submitted SWP3s as well as long term operation and maintenance (O & M) plans. This BMP will be implemented by July 2020 or within six months of the passage of the Post-construction Storm Water Management in New Development and Redevelopment Runoff Control ordinance by Council.
3. Inspection of post-construction sites will be the responsibility of the City Engineer's Office. Sites will be inspected after construction is complete to ensure all control measures were properly constructed. Sites will be prioritized based on information that is gathered during the development of the GIS maps and field surveys of the storm water system and the potential for adverse impacts on water quality from specific sites to determine if and at what frequency follow-up inspections will take place to ensure the submitted O & M plan is being followed. This BMP will be implemented by July 2020 or within six months of the passage of the Post-construction Storm Water Management in New Development and Redevelopment Runoff Control ordinance by Council.



## MCM # 6: Pollution Prevention/Good Housekeeping for Municipal Operations

The City has a variety of programs and activities already in place that provide pollution prevention and good housekeeping measures for City property and infrastructure. Coordination of this MCM is the responsibility of the Safety Service Director with the implementation of various BMPs assigned to specific City Department Heads as listed below. Currently only two City facilities are serviced by storm sewer systems, the Street Department and the Water Reclamation Center. The rest are located in areas of combined sewers. The Street Department will be covered under the MS4 permit and an SWP3 will be developed that complies with the Ohio EPA General NPDES Permit for Storm Water Associated with Industrial Activities #OHR000005. This will be completed by January 1, 2020. The Fremont Water Reclamation Center will be covered under its NPDES permit and a SWP3 will be developed that meets the requirements of that permit which is currently in the renewal process. Below is information for the City's Street Department:

City of Fremont Street Department  
711 South Front Street  
Fremont, Ohio 43420  
Phone 419-332-0696  
Superintendent – Bill Guhn

The following BMPs are currently being implemented. Additional measures will be investigated as necessary to ensure that City activities are not having an adverse impact on water quality. TMDLs addressed by the City's BMPs are total phosphorus, nitrate and nitrite, total suspended solids and bacteria.

1. The City currently has a street sweeping program. The entire City is swept every spring over an approximately seven week period. Downtown areas are also swept prior to any special events. High visibility areas and trouble areas are swept as needed. The street sweeping program is the responsibility of the Street Department Superintendent. This activity addresses the TMDL concern of total suspended solids.
2. In an effort to prevent leaves from entering waterways during runoff events the City has a leaf collection program. This event occurs every fall and takes approximately six weeks to complete. Residents are instructed to not put leaves in the street where they could be washed into storm drains in a rain event prior to pick-up. The leaf collection program is the responsibility of the Street Department Superintendent. Records are kept of the volume of leaves collected, fuel and manpower utilized. The public is notified of this event with an insert in the utility bill, notification on the website, a press release as well as on the Mayor's City Facebook page. This activity addresses the TMDL concern of total suspended solids.
3. In an effort to prevent brush from entering waterways during runoff events the City has a brush drop off and collection program. The brush drop off event occurs every

spring and occurs for four hours on a Saturday with five additional days scheduled throughout the spring and summer. Brush is dropped off at a local composting facility and records are kept of number of loads disposed. During the second week of September there is a brush pick up. Residents are instructed to not put brush in the street where they could be washed into storm drains in a rain event prior to pick-up. The brush drop off and pick up program is the responsibility of the Street Department Superintendent. Records are kept of volume of brush collected, fuel and manpower utilized. The public is notified of this event with an insert in the utility bill, notification on the website, a press release as well as on the Mayor's City Facebook page. This activity addresses the TMDL concern of total suspended solids.

4. The City's Park Department utilizes fertilizer on baseball fields. This activity is conducted in a manner to minimize any negative impact on water quality. Applications are conducted at times when precipitation is not forecast. Records are kept of application rates. Training of personnel conducting the application will be established so that personnel understand the potential negative impacts on water quality that the application could have and records of that training will be kept. The fertilizer application program is the responsibility of the Parks Superintendent and all training and applications records will be maintained by that individual. This activity addresses the TMDL concern of total phosphorus and nitrate/nitrite.
5. The City's Water & Sewer Maintenance Department currently cleans a quarter of the City's sewers and catch basins every year if inspections indicate it necessary. The sewers are cleaned through a contract with a local company. The catch basins are done with City staff. Other areas of the City's sewer system and catch basins are cleaned as needed by City staff. Records of these activities are kept and this program is the responsibility of the Water & Sewer Department Superintendent. This activity addresses the TMDL concern of total suspended solids and bacteria (clean sewers in the combined sewer system lessen the chance of combined sewer overflows).
6. Currently the City conducts annual safety inspections of all City Departments. The inspections are conducted by the City's Safety Committee Chairperson, a Fire Department Representative and the City's Compliance Control Chemist. The Compliance Control Chemist conducts a Spill Prevention and Countermeasure Control inspection during these events to ensure proper storage of chemicals and that measures are being taken to prevent prohibited materials from entering storm and sanitary sewers.

An annual training program will be developed that will begin in 2018. The training will be provided to the service departments and cover topics such as spill prevention and countermeasure plans, proper application of pesticides and how to identify illicit discharges to storm sewers. Water Reclamation Center personnel will assist in the development of Spill

Prevention and Countermeasure Plans and the education programs. Training on other topics will be developed as the need or interest arises.