City of Mount Vernon
*NPDES Phase II Ohio Facility Permit 4GQ00028*G*
Program Years 2009-2013
Storm Water Management Plan (SWMP)
Program Update

The City of Mount Vernon, Ohio

December, 2010
Rev April, 2011

Introduction

This document outlines City of Mount Vernon goals and objectives in implementing and enforcing a Storm Water Management Program (SWMP) to reduce pollutants discharged into nearby water systems, to protect water quality to and to meet requirements of the Clean Water Act per NPDES Phase II Permit Facility Number 4GQ00028*G.

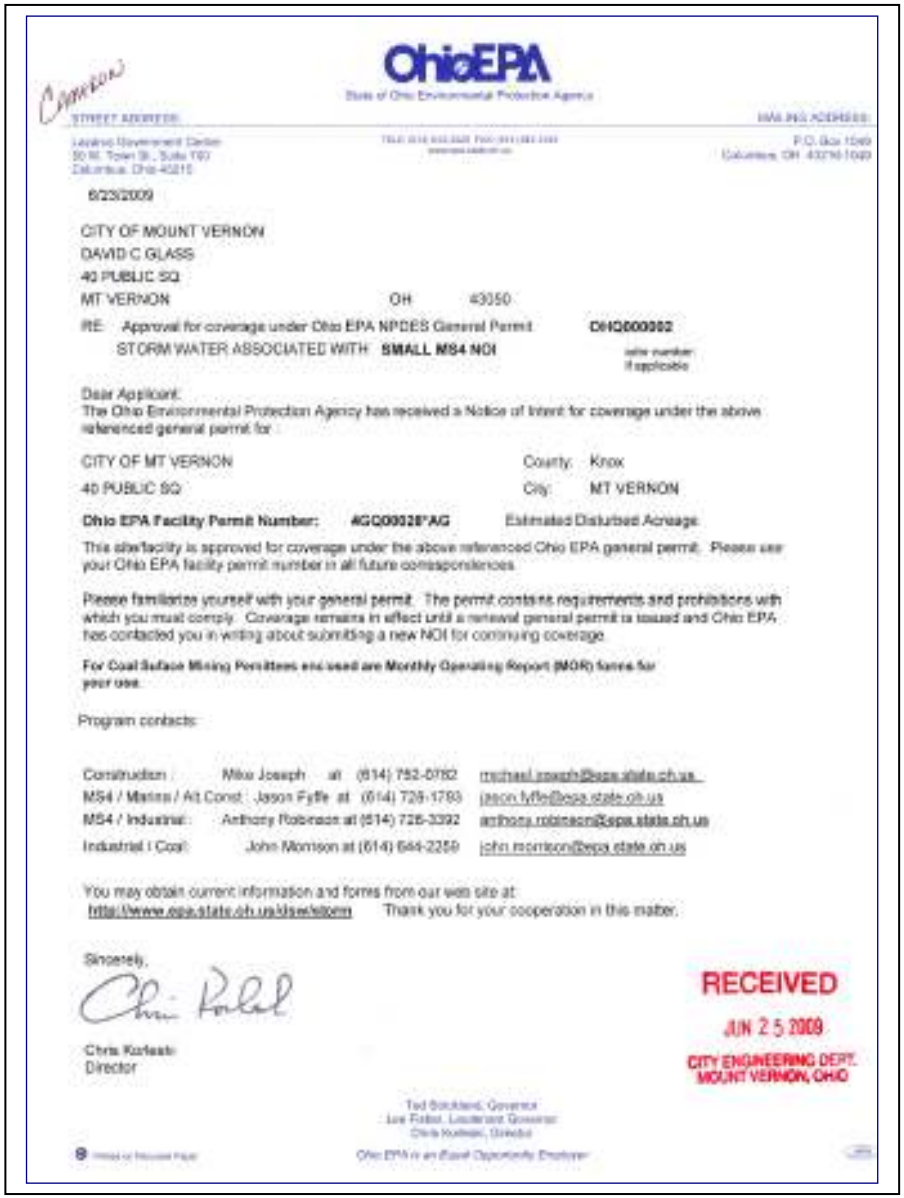
This SWMP cover all areas within Mount Vernon corporation limits, an area of 8.4 square miles and an approximate population of 15,000 (the 2000 census recorded 14,375; the 2008 census estimates 16,037). The City of Mount Vernon lies in the Glaciated Allegheny Plateau and is surrounded by rolling hills and valleys. The Kokosing River and U.S. Route 36 pass through the city. The City's elevation is approximately 1000' above MSL.

This SWMP will address the six minimum control measures necessary to meet the requirements for the NPDES Phase II Permit from 2009 through 2013. It will be updated regularly.

This document, completed in late 2010 is an update to the City's Stormwater Management Plan Phase II prepared for the April 2007. The updates primarily reflect the new MS4 requirements that resulted from the new generation NPDES MS4 Permit OHQ000002 issued January 30, 2009. The significant revisions address the following major permit modifications:

- A Table of Organization *(Part III.A.1.d)*
- Minimum performance standards for each MCM *(Part III.B.1.c, Part III.B.2.c, Part III.B.3.j, Part III.B.4.c, Part III.B.5.g and Part III.B.6.e)*
- Expanded mapping requirements for MS4 infrastructure *(Part III.B.3.b)*
- Complete location and mapping of home sewage treatment systems (HSTS) *(Part III.B.3.e)*
- Review and update local ordinances to be consistent with the most recent OEPA Construction General Permit (CGP) *(Part III.B.4.a.i and Part III.B.5.d)*
- Expanded inspections of construction sites (minimum monthly) *(Part III.B.4.c)*
- Long-term O&M plans for water quality BMPs *(Part III.B.5.f)*
- Development of Storm Water Pollution Prevention Plans (SWP3s) for vehicle maintenance facilities, composting facilities, impoundment lots, bus terminals and waste transfer stations per OEPA guidance *(Part III.B.6.c)*
- Use of a standardized annual report form and requiring specific information for each minimum control measure to be included within annual reports *(Part III.B.1.d, Part III.B.2.d, Part III.B.3.k, Part III.B.4.d, Part III.B.5.h and Part III.B.6.f)*

To the right is an image of a June 23, 3009 letter from the OEPA Director, received by the City of Mount Vernon, acknowledging Small MS4 permit coverage. It is our understanding that the City of Mount Vernon is an "Appendix 7" MS4 – an MS4 area having a population greater than 10,000 people and a population density of 1,000 people per square mile, but not in the major urban areas - added to the overall permit program later in the process. As such, the MS4 permit requirement for the Mount Vernon MS4 begin as of the date of this letter. Beginning in 2011, permitting requirements will be on a calendar year schedule.



OhioEPA

State of Ohio Environmental Protection Agency

6/23/2009

CITY OF MOUNT VERNON
DAVID C GLASS
40 PUBLIC SQ
MT VERNON OH 43050

RE: Approval for coverage under Ohio EPA NPDES General Permit OHQ000002
STORM WATER ASSOCIATED WITH SMALL MS4 NOI

Dear Applicant:
The Ohio Environmental Protection Agency has received a Notice of Intent for coverage under the above referenced general permit for:

CITY OF MT VERNON — County: Knox
40 PUBLIC SQ — City: MT VERNON

Ohio EPA Facility Permit Number: AGQ00028*AG Estimated Disturbed Acreage

This site/facility is approved for coverage under the above referenced Ohio EPA general permit. Please use your Ohio EPA facility permit number in all future correspondences.

Please familiarize yourself with your general permit. The permit contains requirements and prohibitions with which you must comply. Coverage remains in effect until a renewal general permit is issued and Ohio EPA has contacted you in writing about submitting a new NOI for continuing coverage.

For Coal Surface Mining Permittees enclosed are Monthly Operating Report (MOR) forms for your use.

Program contacts:

Construction: Mike Joseph at (614) 752-0782 michael.joseph@epa.state.oh.us
MS4 / Marina / Ag Const: Jason Fyffe at (614) 728-1783 jason.fyffe@epa.state.oh.us
MS4 / Industrial: Anthony Robinson at (614) 728-3392 anthony.robinson@epa.state.oh.us
Industrial / Coal: John Morrison at (614) 644-2259 john.morrison@epa.state.oh.us

You may obtain current information and forms from our web site at: http://www.epa.state.oh.us/dsw/storm Thank you for your cooperation in this matter.

Sincerely,

Chris Korleski
Director

RECEIVED
JUN 25 2009
CITY ENGINEERING DEPT.
MOUNT VERNON, OHIO

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

Ohio EPA is an Equal Opportunity Employer

Evaluation, Record Keeping and Reporting

The City of Mount Vernon, in accordance with NPDES Phase II requirements will conduct yearly evaluations of program compliance, the appropriateness of identified BMP's, and progress toward achieving identified measurable goals and satisfying performance standards.

The City retains copies of reports required by this permit, a copy of the NPDES permit itself and records of pertinent data. These records are kept in the office of the City Engineer. These are public records, and as such will be made available to the public upon receipt of written request.

Annual reports are submitted on April 1 following the end of each year of the permit cycle. The Ohio EPA provided format is used. The reports include:

- Table of Organization for program development and implementation, with primary contact information.
- The status of compliance with the permit conditions and performance standards, assessment of the appropriateness of Minimum Control Measures (MCMs), assessment of achievement of the goals, progress toward reducing the discharge of pollutants to the maximum extent practical (MEP) and the measurable goals for each of the six required MCMs. The report includes summaries of the specific annual reporting requirements identified for each MCM.
- Results of information collected and analyzed during the reporting period, including monitoring data used to assess the success of the program.

- A summary of the storm water activities the City plans to undertake during the next annual reporting cycle, including a planned implementation schedule.
- Any proposed changes to the City's SWMP including changes to any BMP's or any identified measurable goals that apply to the program elements.
- The annual reports will be signed by the City Engineer, or his designated authorized representative. Authorization of a representative must be only for a person having responsibility for the overall operation of the regulated facility or activity, and will be submitted to the Ohio EPA.

Responsible Parties

The City Engineer will serve as the administrator of Mount Vernon's stormwater program and is the primary contact. The Safety-Service Director is also closely involved with all aspects of the program. As appropriate, the Street Superintendent, Administrator of Billing and customer Service, the Public Parks, Public Buildings and Land Administrator, the Cemetery Administrator and the Law Director will provide additional assistance. The City intends to continue to work with the Knox Soil and Water Conservation District and the Knox County Health Department, and Woolpert, Inc. will serve as the City's consultant for the stormwater program.

Refer to the organizational chart on the following page, along with the following text for details of individual roles within the program.

The City of Mount Vernon, Ohio

One of Ohio's Most Livable Communities

Storm Water Management Program Organizational Chart

Coordination and Administration of Storm Water Management Program
Cameron Keaton, PE, City Engineer

Storm Water and Water Quality Engineering Consultant
Woolpert, Inc.

Public Outreach and Education	Public Participation and Outreach	Illicit Discharge Detection and Elimination	Construction Site Runoff Control	Post-Construction Runoff Control	Pollution Prevention/Good Housekeeping
MCM #1	**MCM #2**	**MCM #3**	**MCM #4**	**MCM #5**	**MCM #6**
David Glass, Safety Service Director	David Glass, Safety Service Director	David Glass, Safety Service Director	David Glass, Safety Service Director	David Glass, Safety Service Director	David Glass, Safety Service Director
Cameron Keaton, City Engineer	Cameron Keaton, City Engineer	Cameron Keaton, City Engineer	Cameron Keaton, City Engineer	Cameron Keaton, City Engineer	Cameron Keaton, City Engineer
Pam Muralt, Administrator Billing / Customer Service	David Carpenter, Street Superintendent	*Knox County Health Department*	*Knox County Soil & Water Conservation District*	Mount Vernon Municipal Planning Commission	David Carpenter, Street Superintendent
		William D. Smith, Law Director	William D. Smith, Law Director	David Carpenter, Street Superintendent	Judy Scott, Administrator of Treatment and Distribution
				William D. Smith, Law Director	Geoff Oliver, Public Parks, Buildings and Lands
					Deb Briscoe, Mound View Cemetery

Cameron Keaton	*City Engineer*	*engineer@mountvernonohio.org*	*740.393.9528*
David Glass	*Safety Service Director*	*mtvssd@mountvernonohio.org*	*740.393.9520*
David Carpenter	*Street Superintendent*	*mtvstreet@mountvernonohio.org*	*740.393.9501*
Pam Muralt	*Administrator Billing / Cust Service*	*pmuralt@mountvernonohio.org*	*740.393.9504*
Judy Scott	*Administrator of Treatment and Distribution*	*treatdistadmin@mountvernonohio.org*	*740.393.9504*
Paul G. (Geoff) Oliver	*Public Parks, Public Buildings and Lands*	*mtvpbl1@mountvernonohio.org*	*740.393.9577*
William D. Smith	*Law Director*	*lawdirector@mountvernonohio.org*	*740.393.9562*
Deb Briscoe	*Mound View Cemetery*	*moundviewcemetery@mountvernonohio.org*	*740.393.9581*
Dan Whited	*Consultant - Woolpert, Inc*	*dan.whited@woolpert.com*	*614.827.6172*

Storm Water Management Program

This plan outlines the six MCMs required for the SWMP as listed below.

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

MCM 1 through MCM 6 Compliance

The City of Mount Vernon's planned activities related to each of the six MCMs for the remainder of the permit term are addressed in this report. The activities are addressed as specifically as possible with emphasis on the OEPA's performance measures per the most recent generation of the permit. Items presented in the 2007 SWMP have been revised to address the new requirements. The overall plan for each MCM is presented in tabular form in OEPA annual report form for ease of use.

MCM 1 - Public Education and Outreach

The City of Mount Vernon will continue to use a mix of BMPs to address MCM 1. This MCM requires targeting homeowners, school children and commercial / industrial business owners (including restaurants) with educational materials. The City is not known to have major problems with pollutants contained in storm water runoff, however, it is understood that public outreach helps counteract increased impacts on the quality of the environment within our corporation limits as growth and development occur.

Methods and BMPs noted in the 2007 plan included an ambitious plan of stormwater web pages, newsletters, utility bill notes, partnerships with neighboring communities, bi-lingual materials, info to commercial industrial dischargers, newspaper articles, TV PSAs and classroom activities. Now that the Mount Vernon program has been initiated and the new generation permit is in place, the City has chosen to modify its MCM1 activities to focus its resources in a more targeted way to key audiences with multiple specific messages as required by the permit. This approach would be expected to be more impactful and cost effective than the previous approach due to its targeted nature. This plan is reflected in Table 1 below.

Resources available to the City to apply toward this effort include a City website and community newsletters (which may be both distributed in print form and posted on the website). There are also methods of direct distribution of materials that may be employed for MCM #1 through City offices and via community leadership (civic) organizations. Another readily available method of distribution of material is inclusion with utility bills. As practical, the City of Mount Vernon may also participate in local festivals, with booths, informational brochures and literature being distributed and displayed. This may be part of MCM 1 or MCM 2.

The Mount Vernon City School District will also be targeted with MCM 1 activities. It is hoped that the Knox County Soil and Water Conservation District will be available to help in the implementation of this measure with classroom presentations regarding storm water runoff and proper pollution prevention and other programs they currently offer.

TABLE 1 – MCM 1 (Public Education and Outreach) PERMIT PLAN

BMP (mechanism) & Responsible Party	Measurable Goal	Theme or Message	Target Audience	% of Target Audience to be Reached	Summary of Planned Activities	Proposed Schedule
Distribute educational Information for local public education - <u>hard copy media</u> Safety-Service Director City Engineer	Provision of information to the public through flyers, brochures, utility billing inserts) to build Awareness of Storm Water and Water Quality benefits within the Mount Vernon area	1 Stormwater Management Plan (incl 6 MCMS) 2 Water quality 3 Storm water management regulations and permitting 4 Illicit Discharge, Detection and Elimination 5 Home Sewer Treatment Systems	1 General Public 2 General Public 3 Developers / Consultants 4 General Public 5 General Public	To the Maximum Extent Practical	1 The SWMP available to public at City offices and linked (hard copy media) on web page (internet media). 2 Flyers, Bill stuffers 3 Targeted newsletter 4 Flyers or Brochure 5 Bill stuffers	1 Early 2011 2 Late 2011 3 2011 thru 2012 (post regs revisions) 4 Early 2013 5 Late 2013 / Early 2014
Distribute educational Information for local public education - <u>internet media</u> Safety-Service Director City Engineer	Build Awareness of Storm Water and Water Quality Benefits within the Mount Vernon area through City's web page	1 Stormwater Management Plan 2 Water quality 3 Storm water management regulations and permitting 4 Illicit Discharge, Detection and Elimination 5 Home Sewer Treatment Systems	All web site visitors. Two primary focused groups would be the general public (re the Stormwater Management Plan) and Developers / Consultants (re Stormwater Management regulations and permitting) Remaining themes would mimic the hard copy info	To the Maximum Extent Practical	Web site improvement to include the general public and the development community through web site information.	Ongoing – schedule to mirror the hard copy media schedule Immediate focus as noted in Target Audience Column
Educational Curriculum Material in City School System Safety-Service Director Knox Co SWCD	Elementary School Classroom Education	1 Stormwater Management Plan 2 Water quality 3 Litter 4 Pet Waste 5 Car Washing	Providing stormwater education at schools reaches not only to students but parents also	To the Maximum Extent Practical	Partner with educators to implement storm water-related programs for the classroom – themes will be as appropriate, possibly based on those in the themes column	Ongoing – minimum once annually
Community Meetings Safety-Service Director City Engineer	Provide storm water education information to local community groups (e.g – Lions or Rotary)	Storm Water Master Plan, Water Quality, IDDE	Businesses Owners and Community Leaders	To the Maximum Extent Practical	Lunch presentation with "take away" literature	Ongoing – once annually

MCM 2 - Public Involvement / Participation

The City of Mount Vernon continues its commitment to increasing public involvement and participation as one of the key components of its SWMP. The more public involvement that can occur in the early stages, the less chance the City takes in dealing with potential future challenges.

Methods and BMPs noted in the 2007 plan included Storm Drain Stenciling, an Adopt-A-Stream Program, and establishing / maintaining a Stormwater Advisory Team (SWAT). The MCM 2 section of the 2007 SWMP also references City Ordinances, Public Hearings, Public Hearings, Annual Stormwater Meetings, and Watershed Organizations.

The City proposes to modify the 2007 MCM 2 BMP by employing a defined and more focused approach. The stenciling and stream programs remain in the plan, and have already been initiated. The remainder of the items will be rolled into the Stormwater Advisory Group BMPs. Details are reflected in TABLE 2 - MCM 2 PLAN below. These details are subject to review as the SWAT develops and organizes it's activities.

TABLE 2 – MCM 2 (Public Involvement / Participation) PERMIT PLAN

BMP (Activity) & Responsible Party	Measurable Goal	Theme or Message	Target Audience	Estimate of People to Participate	Summary of Planned Activities	Proposed Schedule
Stormwater Advisory Team Safety-Service Director City Engineer	Build and maintain local involvement and participation efforts in the Mount Vernon Community through public involvement. Raise citizen awareness of water quality and allow for public participation.	Maintaining public awareness in watershed based activities in Mount Vernon through focused and hands-on participation.	General Public and Businesses	Team members: ▪ City Engineer ▪ Safety Service Director ▪ Superintendents of Water and Wastewater, Parks, Streets, etc. ▪ Knox SWCD Other to the extent practical	Organize Team and create a plan to include: 1) Regular team meetings and Public "Town-hall" meetings on the SWMP 2) Participation in local Watershed Group (e.g. Kokosing Scenic River Advisory Council, the Muskingum Watershed Conservancy District), etc.) 3) Provide opportunity to a) implement SWCD Public Participation Programs b) maintain an "Adopt-A-Stream" Program (possible via a civic organization) c) maintain "Storm Drain Stenciling" Program 4) Provide CIP input related to Storm Water and Water Quality	Formalize team in early 2011, initiate plan in mid 2011 and then maintain ongoing activity
Rain Garden Demonstration Project City Engineer	Demonstrate to citizens within the MS4 what a rain garden is and how it benefits water quality, water quantity and the environment.	Rain gardens are an inexpensive, simple way to implement and environmentally sound solutions to urban stormwater runoff. Rain gardens can filter runoff pollution, recharge groundwater, improve water quality, protect rivers and streams, remove standing water, reduce mosquito breeding, etc.	Residents of MS4.	To the extent practical	A demonstration rain garden project is planned for the Hiawatha Park. The park is being funded by a SWIF grant. Building of the rain garden is expected to include participation of the public. This activity will also enhance MCM I opportunities.	2011 / Ongoing
Public Input Safety-Service Director City Engineer	Maintain availability of the City's storm water management plan to the public and allow easy opportunity for input and comment on the plan – hard copy and website.	Storm Water Master Planning, how it affects YOU. .	General public, residents and businesses.	To the extent practical	Announce (on web site and in council meetings) that a copy of the storm water management plan is available for public comment. Make the plan available for public comment.	2011 / Ongoing

MCM 3 - Illicit Discharge Detection and Elimination (IDDE)

MCM 3 BMPs and activities outlined here are generally the same as outlined in 2007. However, a more specific implementation plan has been provided here. This control measure will continue involve City staff, the Knox County Health Department and possibly consulting engineers.

The City of Mount Vernon has storm sewers that may be susceptible to illegal dumping or unintentional contamination issues, such as car washing, oil and grease from restaurants, pet waste and household chemical spills. The City will work to locate pollutant problems through citizen complaints, visual screening and visual assessment in dry weather conditions.

Although many developments within the City are served by public water and sewer systems, some older homes are on larger lots in more rural type areas with home sewer treatment systems (HSTS). These systems are regulated and approved by the Health Department. The Health Department will be a key resource in identifying the locations of properly permitted HSTS, whether they outfall to the MS4, and their ongoing monitoring results.

As part of this plan, the City will work closely with the Health Department to locate possible HSTS that due to their age may have not been properly permitted in the past. The City will work to the extent practical with the Health Department to coordinate actions to ensure that systems are being monitored on a systematic basis and follow-up steps are taken to ensure illicit discharges to the MS4 are not occurring due to failed septic systems.

The City of Mount Vernon has begun an inventory of known storm water structures and will continue to update it per the original 2007 plan and additional requirements of the second generation permit (e.g – full system inventory, including post construction best management practices.

During the permit period, the City will continue to review and modify or create ordinances relative to prohibiting non-storm water discharges into its storm water system. This will include the enforcement and penalties associated with violations of these policies. The City must continue to explore whether it can establish policing authority allowing staff to enter parts of private property in order to alleviate and eliminate pollutant problems that may be illegally occurring along water ways.

As required by permit, annual reports will include progress on each of the MCM activities, as well as provide available data including: the number of outfalls dry-weather screened, the number of dry-weather flows identified, the number of illicit discharges identified, the number of illicit discharges eliminated, schedules for continued elimination of illicit connections that have been identified but have yet to be eliminated and a summary of updates to the storm sewer system mapping.

Strategies and measurable goals that will be implemented for this control measure during the permit term are shown in Table 3.

TABLE 3 – MCM 3 (Illicit Discharge Detection and Elimination (IDDE)) PERMIT PLAN

MCM 3 BMP & Responsible Party	Measurable Goal	Summary of Planned Activities	Proposed Schedule
Ordinance or Other Regulatory Mechanism City Engineer Administrator of Treatment and Distribution City Law Director	Adopt an ordinance prohibiting illicit discharges into the storm sewer system.	1.Adopt IDDE ordinance using OEPA model ordinance as template 2. Post the ordinance on the City's website. 3. Develop a procedure to enforce the illicit discharges ordinance (post inventory).	1.early 2011 2. 2011 3. 2012
Storm Sewer System Map City Engineer	Develop and maintain storm system inventory that locates outfalls including catch basins, pipes, ditches, flood control facilities, and post construction best management practices	1. Convert existing maps to ACAD / GIS 2. Develop complete inventory mapping of the City storm sewer system. 3. Update and edit stream database with new storm water system information. Review map of outfall locations.	1. Early 2011 2. Late 2011 / Early 2012 3. Ongoing
HSTS Mapping and List City Engineer Know County Health Department	Develop a list showing addresses and the parcel ID's as available of all HSTSs and develop a map of on-site sewage disposal systems within the City	1. Perform records search and obtain a list of on-site sewage disposal systems from the Board of Health. 2.Map the location of all known home sewage treatment systems connected to the City's MS4. 3.Continue to update the map and list of HSTSs as information becomes available.	1. 2011 2. 2012 3. Ongoing
IDDE Plan City Engineer Administrator of Treatment and Distribution	Develop a plan to eliminate significant sources of pollution	1. Work with Board of Health to identify priority areas of that have significant sources of pollutants. 2. Develop an on-going IDDE plan and schedule that prioritizes illicit discharges for detection and elimination. 3. Develop a schedule of eliminating illicit connections to the storm sewer system.	1. 2011 2.Late 2012 / Early 2013 3. 2013
Dry-Weather Screening of Outfalls City Engineer Administrator of Treatment and Distribution	Dry weather screen all known outfalls within the City per the IDDE Plan developed in above listed BMP	1. Collect water quality samples from all outfalls. 2. Identify potential sources of pollution. 3. Include this information in the City's system inventory.	2013

MCM 4 - Construction Site Runoff Control

The City of Mount Vernon reviews construction storm water and grading plans prior to the allowing construction to commence. The City Engineer and his staff check the adequacy of construction site runoff control as part of the site plan review process.

The City Engineer's staff responsibility includes performing on-site inspections during all phases of construction any development affecting more than 1 acre of land disturbance. Per OEPA requirements, these are to occur at a minimum-at construction onset and at least monthly thereafter.

The City has adopted regulations within its Codified Ordinances requiring storm water management plans and construction activity that control erosion and sedimentation.

The current ordinances will require some modification to be consistent with the most recent generation OEPA Construction General Permit. The City intends to use its contracted engineering consultant to assist with recommending revisions to the storm water and ESC ordinances, along with enhancements to the site inspections, complaint and enforcement procedures.

Revisions to regulations and ordinances are anticipated to include the following items by the end of 2011:

- consideration of potential water quality impacts of each project
- possibly include requirements for construction site operators to control waste such as (but not limited) to discarded building materials, concrete truck washout, chemicals, liter and sanitary waste at construction sites, that could adversely impact to water quality
- possibly include procedures for the receipt and consideration of information submitted by the public
- includes procedures for regular site inspection and enforcement of additional control measures
- consider adding bonding requirements and fines specific to compliance with the Storm Water Management and Pollution Control plan as appropriate

Strategies and measurable goals that will be implemented for this control measure during the permit term are shown in Table 4.

Each annual report for this MCM includes and documents the number of applicable sites in the City of Mount Vernon, the number of pre-construction storm water pollution prevention plan reviews performed, the number and frequency of site inspections, the number of violation letters issued, the number of enforcement actions taken and the number of complaints received and number followed up on. This information is provided for the report by City Staff and reflected in the standard format report.

TABLE 4 – MCM 4 (Construction Site Runoff Control) PERMIT PLAN

MCM 4 BMP & Responsible Party	Measurable Goal	Summary of Planned Activities	Proposed Schedule
Ordinance or Other Regulatory Mechanism City Engineer Mount Vernon Municipal Planning Commission City Law Director	Adopt (revised) ordinance requiring permit coverage, erosion and sedimentation controls, and waste controls at construction sites that disturbing one or more acres.	1. Adopt and maintain a regulatory mechanism that is at least as stringent as current state mandated rules. 2. Develop a procedure to enforce the erosion and sedimentation controls ordinance. 3. Coordinate the implementation of ordinance.	1. 2011 2. 2011 /2012 3. Ongoing
Sediment and Erosion Control Requirements City Engineer Mount Vernon Municipal Planning Commission City Law Director	Adopt (revised) ordinance requiring permit coverage, erosion and sedimentation controls, and waste controls at construction sites that disturbing one or more acres.	1. Adopt and maintain a regulatory mechanism that is at least as stringent as current state mandated rules. 2. Develop a procedure to enforce the erosion and sedimentation controls ordinance. 3. Coordinate the implementation of ordinance.	1. 2011 2. 2011 / 2102 3. Ongoing
Complaint Process City Engineer Mount Vernon Municipal Planning Commission City Law Director	Improve the process for receiving and processing complaints.	1.Develop a system for receiving and processing complains.	2011
Site Plan Review Procedures City Engineer Mount Vernon Municipal Planning Commission	Review the process for pre-construction storm water pollution prevention plan review. Include all residential and commercial projects that disturb one or more acres.	1. Review the existing procedures for site plan review. 2. Track the number of site plans reviewed.	1. 2011 2. Ongoing
Site Inspection Procedures City Engineer	Ensure construction sites are inspected to ensure compliance with SW3P's.	Track the number of construction sites within the City, the number of inspections performed, and the average frequency of inspections.	2011 / 2012 and ongoing
Enforcement Procedures City Engineer Mount Vernon Municipal Planning Commission City Law Director	Develop and enforce City regulations.	Enforce City ordinances and regulations for all construction activity that disturbs one or more acres.	2011 / 2012 and ongoing

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

City of Mount Vernon Public Works staff coordinates the plan review process to identify and manage the containment of runoff on-site as part of the site plan review process per OEPA requirements. As part of the staff's responsibility, on-site inspections will be conducted during construction as part of any development that disturbs one acre or more. The City will work to ensure that the approved site plan is adhered to in order to prevent post-construction runoff of pollutants. The City staff is responsible for general oversight of the development process and ensuring that long term operation and maintenance plans are enforced. This may be accomplished with annual inspections of the control structures or devices for operational integrity.

The City reviews and recommends the use of either detention or retention controls as appropriate with any new development to help control the rate at which water discharges off site, in compliance with the water quality standards of the OEPA NPDES permit. The City intends to update its storm water management regulations and ordinances to address the management of post-construction runoff, and make them meet or exceed the technical requirements of the OEPA NPDES General Constriction Permit.

The City may adopt "preferred" BMPs for water quality control and offer printed guidance to consultants, developers and the general public on OEPA approved best management practices (BMPs). Ultimately, constructed and accepted BMP's will be kept in a data base that includes the contact information and maintenance responsibility on the primary private operator of the site. The City will maintain these records. Failure by the owner to properly maintain or operation the BMP will be documented and followed up with.

Strategies and measurable goals that will be implemented for this control measure during the permit term are shown in Table 5.

Annual reporting on MCM 5 by the City of Mount Vernon will include the number of applicable sites in Mount Vernon requiring post-construction controls, the number of pre-construction storm water pollution prevention plan reviews performed, the number of inspections performed to ensure as built per requirements, and the number of long-term operation and maintenance (O&M) plans developed and the number of agreements in place.

TABLE 5 – MCM 5 (Post-Construction Storm Water Management in New Development and Redevelopment) PERMIT PLAN

MCM 5 BMP & Responsible Party	Measurable Goal	Summary of Planned Activities	Proposed Schedule
Ordinance or Other Regulatory Mechanism City Engineer Mount Vernon Municipal Planning Commission City Law Director	Adopt (revised) ordinance addressing storm water runoff from new development / redevelopment projects disturbing one or more acres.	1. Adopt ordinance 2. Educate the development community as practical 3. Coordinate the implementation of ordinance.	1. 2011 2. 2011 /2012 3. Ongoing
Post-Construction Requirements City Engineer Mount Vernon Municipal Planning Commission City Law Director	Adopt (revised) ordinance that requires post construction storm water management per OEPA general construction permit.	1. Adopt an ordinance 2. Continue to educate development community regarding approved BMPs 3. Continue to review and evaluate BMP alternatives	1. 2011 2. 2011 / 2102 3. Ongoing
Site Plan Review Procedures City Engineer Mount Vernon Municipal Planning Commission	Adopt (revised) ordinance that requires post construction storm water management per OEPA general construction permit.	1. Review every site plan for post construction requirements. 2. Meet with developers and engineers during design process to encourage the use of non-structural BMPs / green infrastructure. 3. Report the number of sites / plans reviewed.	1. 2011 2. 2011 / 2012 3. Ongoing
Site Inspection Procedures City Engineer	All post construction (structural and non structural) BMPs will be inspected prior to acceptance of the project by the City to ensure the BMPs are functioning properly.	1. Develop an inspection schedule for structural and nonstructural BMPs. 2. Report the number of sites inspected, number of inspections performed, and average frequency of inspections.	1. 2011 2. Ongoing
Enforcement Procedures City Engineer City Law Director	Adopt and implement enforcement procedures	1.Adopt an ordinance that addresses storm water runoff from new development and redevelopment projects that disturb one acre or greater. 2. Enforce ordinance	1. 2011 2. Ongoing
Long-Term O&M Plans/Agreements City Engineer Mount Vernon Municipal Planning Commission City Law Director	All sites will have an O&M plan.	1.Adopt a requirement within the ordinances that requires projects to have and an operations and maintenance plan identifying responsibility for private BMP O&M. 2.Report the number of sites with agreements.	1. 2012 2. Ongoing

MCM 6 - Pollution Prevention / Good Housekeeping for Municipal Operations

The City of Mount Vernon will continue / improve its efforts to prevent or reduce pollution from its municipal operations by several methods including:

- Continuation of vehicle maintenance procedures. This maintenance program will include a schedule of regular maintenance tasks and inspections of city vehicles to eliminate the occurrence of oil, grease and fluid leaks. Vehicle maintenance logs should be tracked. Vehicle maintenance and washing will be conducted indoors whenever possible.

- City vehicle and equipment storage will be conducted in accordance with appropriate BMPs and per Municipal facility SWP3s which will be developed in early 2011.

- The City Engineer, as coordinator of the activities of the NPDES permit should monitor and record weather conditions and Street Department's application of salt distributed along roadways during snow emergencies. As a matter of budget, the City attempts to minimize the amount of salt used.

- The City will continue training programs for street and utility personnel once per year. This practice will be continued as required per permit.

- City staff should minimize pest control and herbicide use on City owned properties, including City Parks.

- Any flood management projects proposed in the future (none are currently planned) to be carried out in or by the City will automatically be assessed for impacts on water quality during the review of the project by the City Engineer. They will conduct hydrologic analysis and review the scope of the project for the need for any additional water quality protection devices or practices and recommend those as appropriate.

Strategies and measurable goals that will be implemented for this control measure during the permit term are shown in Table 6.

Each year the annual report shall include documentation and summary of employee training programs-the number of employees and others attended and a summary of activities implemented for the City's operation and maintenance program each year.

TABLE 6 – MCM 6 (Pollution Prevention / Good Housekeeping for Municipal Operations) PERMIT PLAN

MCM 6 BMP & Responsible Party	Measurable Goal	Summary of Planned Activities	Proposed Schedule
Employee Training Program City Engineer, Street Superintendent Administrator of Treatment and Distribution, Public Parks, Buildings and Lands Superintendent, Mound View Cemetery Superintendent	Train key staff on issues related to MS4 permit in general, possible emphasis on MCMs #3 and #6	1. Conduct In-house training of appropriate staff, 2. Participate in WMAO and other local training, 3. Distribute storm water information to employees	Ongoing / Annually
List of Facilities Subject to Program City Engineer, Street Superintendent, Administrator of Treatment and Distribution, Public Parks, Buildings and Lands Superintendent, Mound View Cemetery Superintendent	Completed SW3Ps for subject facilities	1. Complete list of sites requiring SWP3s 2, Complete SWP3s for facilities	1. January 2011 2. July 2011
MS4 Maintenance City Engineer, Street Superintendent Administrator of Treatment and Distribution, Public Parks, Buildings and Lands Superintendent, Mound View Cemetery Superintendent	Maintain ongoing schedule for MS4 maintenance. Incorporate pollution prevention and good housekeeping techniques at municipal facilities. Ensure storm structures are maintained.	1. Develop schedule for cleaning catch basins 2. Summarize maintenance activities in the annual report.	1. 2011 / 2012 (post inventory) 2. Ongoing
Disposal of Wastes City Engineer, Street Superintendent, Administrator of Treatment and Distribution, Public Parks, Buildings and Lands Superintendent, Mound View Cemetery Superintendent	Properly manage and dispose of wastes	1. Maintain annual list of wastes disposed. 2. Document how wastes are disposed with amounts. 3. Develop procedures for proper waste disposal.	1. Ongoing 2. Ongoing 3. 2011
Road Salt City Engineer , Street Superintendent	Properly apply salt in a way that minimizes usage	1. Document existing street deicing procedures. 2. Document tons of salt used each year. 3. Develop procedures for reducing salt use	1. 2011 2. Ongoing 3. 2011 / 2012
Pesticide & Herbicide Usage City Engineer, Public Parks, Buildings and Lands Superintendent Mound View Cemetery Superintendent	Properly manage use of pesticides and herbicides.	1. Record existing pesticide and herbicide procedures. 2. Document amount of pesticide and herbicide used. 3. Develop procedures for reducing pesticide and herbicide use.	1. 2011 / Ongoing 2. Ongoing 3. 2011 / Ongoing
Fertilizer Usage City Engineer, Public Parks, Buildings and Lands Superintendent Mound View Cemetery Superintendent	Decrease use of fertilizer.	1. Record existing fertilizer procedures. 2. Documents general areas where fertilizer is applied. 3. Document amount of fertilizer used. 4. Develop procedures for reducing pesticide and herbicide use.	1. 2011 2. Ongoing 3. Ongoing 4. 2011 2012
Street Sweeping City Engineer , Street Superintendent	Minimize trash, grits and other pollutants in the street which may be transferred to the storm sewer system.	1. Document and maintain a street sweeping schedule. 2. Record amount of material collected and disposed.	1. 2011 / 2012 2. Ongoing
Flood Management Projects City Engineer , Street Superintendent	Ensure storm water management is considered for all flood management projects.	Incorporate water quality protection devices.	Ongoing