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**CITY OF WOOSTER**  
**STORMWATER MANAGEMENT PLAN**  
**2022**

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**Ohio EPA MS4 Permit OHQ000004**

**2021-2026**

**Version: v4.0**



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# City of Wooster

## CERTIFICATION

"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 gathered and evaluated 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, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of a fine and imprisonment for knowing violations."

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Roger Kobilarcsik  
Engineering Division Manager  
City of Wooster, Ohio

## EXECUTIVE SUMMARY

The City of Wooster must develop, implement, and enforce a Stormwater Management Plan (SMP) designed to reduce the discharge of pollutants to protect water quality and satisfy the requirements of the Federal Water Pollution Control Act and the Ohio Water Pollution Control Act. This document outlines the City's program to meet these requirements under the Ohio Environmental Protection Agency (OEPA) National Pollutant Discharge Elimination System (NPDES) program. Dischargers of stormwater are authorized by the Ohio Environmental Protection Agency (Ohio EPA) from Small Municipal Separate Storm Sewer Systems (MS4) to discharge from the outfalls and to the receiving surface waters of the State under the conditions outlined in the most recent general MS4 permit (OHQ000004) and construction stormwater permit (OHC000005).

Federal Water Pollution Control Act: [33 USC 1251 et. seq.](#)

Ohio Water Pollution Control Act: [Ohio Revised Code - Chapter 6111](#)

Small Municipal Separate Storm Sewer Systems (MS4s): [General Permit OHQ000004](#)

Stormwater Discharges from Small and Large Construction Activities: [General Permit OHC000005](#)

The plan identifies the City's legal authority to implement the OEPA's general permit requirements and addresses the six minimum control Measures required by state regulations. The program's overall goal is to protect water quality by reducing or preventing pollutants from mixing with stormwater runoff, to the maximum extent practicable, flowing into the City's owned and operated small municipal storm sewer system (MS4) into waterways. An MS4 system is a conveyance or system of conveyances owned and operated by the City designed or used to collect and convey solely stormwater into the State's surface waters.

## PERMIT COVERAGE AREA

The City of Wooster covers approximately 17.49 square miles in the Upper Killbuck Creek Watershed near the confluence of Killbuck Creek, Apple Creek, and Christmas Run, with a population of 26,751 based on 2021 data<sup>(1)</sup>. The City is mainly residential, with commercial areas in the downtown area, centered on the intersection of Liberty and Market Streets and the north end of the town along SR 83 north of the DIX. The Stormwater Management Plan traverses all areas within the incorporated City limits. The stormwater system consists of storm sewer pipes, catch basins, stormwater outfalls, roadway curbs and gutters, ditches, constructed channels, and post-construction permanent stormwater controls.

## REPORTING REQUIREMENTS

The City of Wooster shall submit a report and update annually during each five-year term of the permit cycle. The report shall include the status of compliance with the permit conditions, an assessment of the appropriateness of the stormwater management practices (SMPs), and progress toward achieving measurable goals for each of the six minimum control measures. The City shall also summarize all data collected and analyzed during the permit cycle and include said summary as part of the annual report.

The annual report shall include a summary of the City's activities during the annual reporting cycles and any changes to the SMPs or measurable goals. The City shall evaluate the overall SWMP annually to determine if modifications are necessary to meet each MCM's goals. Program modifications shall be identified within the modification log located within the Appendix and summarized within the annual reports submitted to the OEPA.

## LEGAL AUTHORITY

The Charter and Code of the City of Wooster give the City authority to control the quality of separate stormwater discharge to its storm sewer system. The City of Wooster has the financial resources and legal authority to implement its stormwater management plan fully. The City's established stormwater utility provides funding for operating and maintaining the system and funding NPDES compliance activities. The City has adopted this stormwater management plan.

The City has implemented stormwater ordinances in Section 925 of the City of Wooster Codified Ordinances. Because of the complexity and breadth of stormwater regulation, the City of Wooster has elected to adopt a [Site Development and Improvement Manual](#) per City of Wooster, Codified Ordinance - [Section 925.05](#). The *Site Development and Improvement Manual* integrates the requirements of the Ohio EPA Small MS4 permit (OHQ000004) and General Construction Stormwater permit (OHC000005) while providing the City flexibility in maintaining compliance as these permits are updated, or requirements change. The current version of the manual is organized into fourteen sections.

- Section 1: Regulations Overview
- Section 2: Definitions
- Section 3: General Provisions
- Section 4: Permitting
- Section 5: Drainage Plan
- Section 6: Stormwater Management Plan (SMP)
- Section 7: Construction
- Section 8: Post-Construction
- Section 9: Operation and Maintenance of Stormwater Controls
- Section 10: Protection of Watercourses and Wetlands
- Section 11: Prohibited Discharges
- Section 12: Illicit Discharge
- Section 13: Inspection, Enforcement Action, and Penalties
- Section 14: Fees, Bonding, and Estimated Stormwater Units (ESU)

## HYDROGRAPHIC INFORMATION

The City is located within or adjoins four (4) sub-watersheds of the Upper Killbuck Creek Watershed. These include the Clear Creek-Killbuck Creek, Apple Creek, and Little Apple Creek watersheds, which flow into the Jennings Ditch-Killbuck Creek Watershed south of Wooster. The following information is based on the OEPA Integrated Water Quality Monitoring and Assessment Reports for the Killbuck Creek Watershed and related sub-watersheds.

### ***Clear Creek-Killbuck Creek (OH050400030505)***

The Clear Creek-Killbuck Creek watershed is 22.58 square miles, rated as impaired, and comprises 33% row crops, 32% developed land, 17% grass/pasture, 16% forest, and 2% unclassified. The watershed is 303(d) listed, indicating that the waterbody is impaired or threatened and needs a TMDL restoration plan. The aquatic life use assessment is rated good for both exceptional warmwater habitat/coldwater habitat and warmwater habitat. Human health regarding fish consumption was not assessed, and recreational use involving primary contact is rated impaired because of bacteria levels.

### ***Little Apple Creek (OH050400030601)***

The Little Apple Creek watershed is 12.82 square miles rated as impaired and comprises 38% developed land, 29% row crops, 19% grass/pasture, 13% forest, and 1% unclassified. The watershed is 303(d) listed, indicating that the waterbody is impaired or threatened and needs a TMDL restoration plan. The aquatic life use assessment is rated impaired for warmwater habitats because of fish passage barriers. Human health regarding fish consumption was not assessed, and recreational use involving primary contact is rated impaired because of bacteria levels.

### ***Apple Creek (OH050400030602)***

The Apple Creek watershed is 38.87 square miles rated as impaired and comprises 51% row crops, 20% developed land, 16% grass/pasture, 12% forest, and 1% unclassified. The watershed is 303(d) listed, indicating that the waterbody is impaired or threatened and needs a TMDL restoration plan. The aquatic life use assessment is rated good for both exceptional warmwater habitat/coldwater habitat and warmwater habitat. Human health regarding fish consumption was not assessed, and recreational use involving primary contact is rated impaired because of bacteria levels.

### ***Jennings Ditch-Killbuck Creek (OH050400030604)***

The Jennings Ditch-Killbuck Creek watershed is 38.87 square miles, rated as impaired, and comprises 34% row crops, 21% grass/pasture, 26% forest, 14% developed, and 5% unclassified. The watershed is 303(d) listed, indicating that the waterbody is impaired or threatened and needs a TMDL restoration plan. The aquatic life use assessment is rated as good for coldwater habitats. Warmwater habitat is impaired because of dissolved oxygen levels, habitat alterations, and organic enrichment. Human health regarding fish consumption was not assessed, and recreational use involving primary contact is rated impaired because of bacteria levels.

The Killbuck Marsh Wildlife Area, owned by ODNR, is 3 miles south of the Wooster wastewater treatment plant. This area has been identified as critical habitat.

### ***Total Maximum Daily Load (TMDL)***

The current permit requires Stormwater Management Practices SMPs to be selected to address USEPA-approved total maximum daily loads (TMDL) recommendations for identified water quality problems associated with MS4 discharges when identified and assigned. Waterways in the Wooster area currently do not have TMDL requirements assigned by the Ohio EPA; however, these are pending ODNR/USEPA review and are expected in the future. The City of Wooster has made provisions to address TMDL requirements once released.

## **STORMWATER MANAGEMENT PLAN (SMP)**

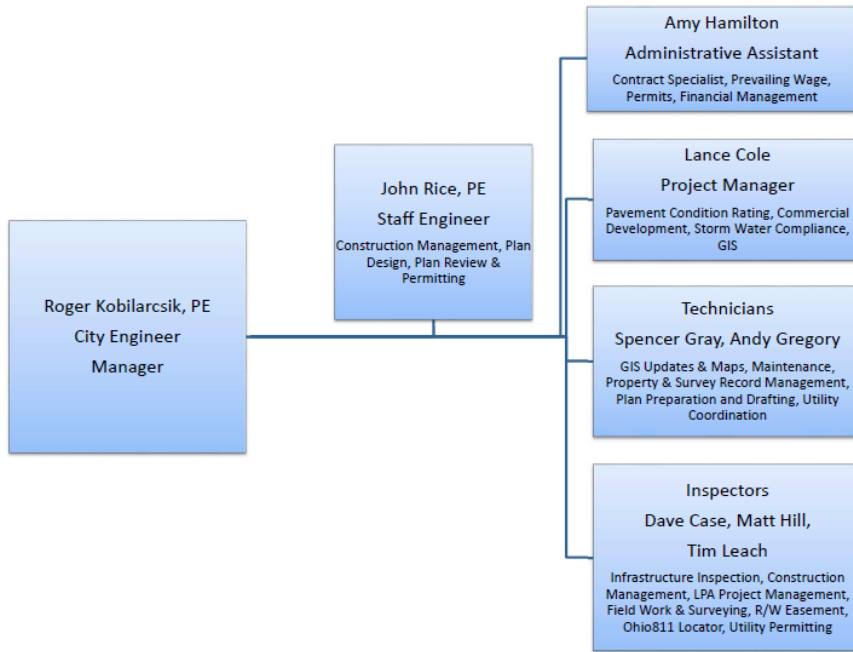
The NPDES Small MS4 permit was reissued on April 1, 2021 (OHQ000004). The new permit requires MS4 Communities to renew coverage and update their SMP consistent with the current permit requirements. The permit further outlines Six Minimum Control Measures (MCM) the City is expected to utilize in developing our SMP. Generally, the City plan identifies the strategies, existing programs, and proposed programs for each minimum control measure. Each measure is addressed separately in the following sections.

The Six Minimum Control Measures required by the Ohio EPA are:

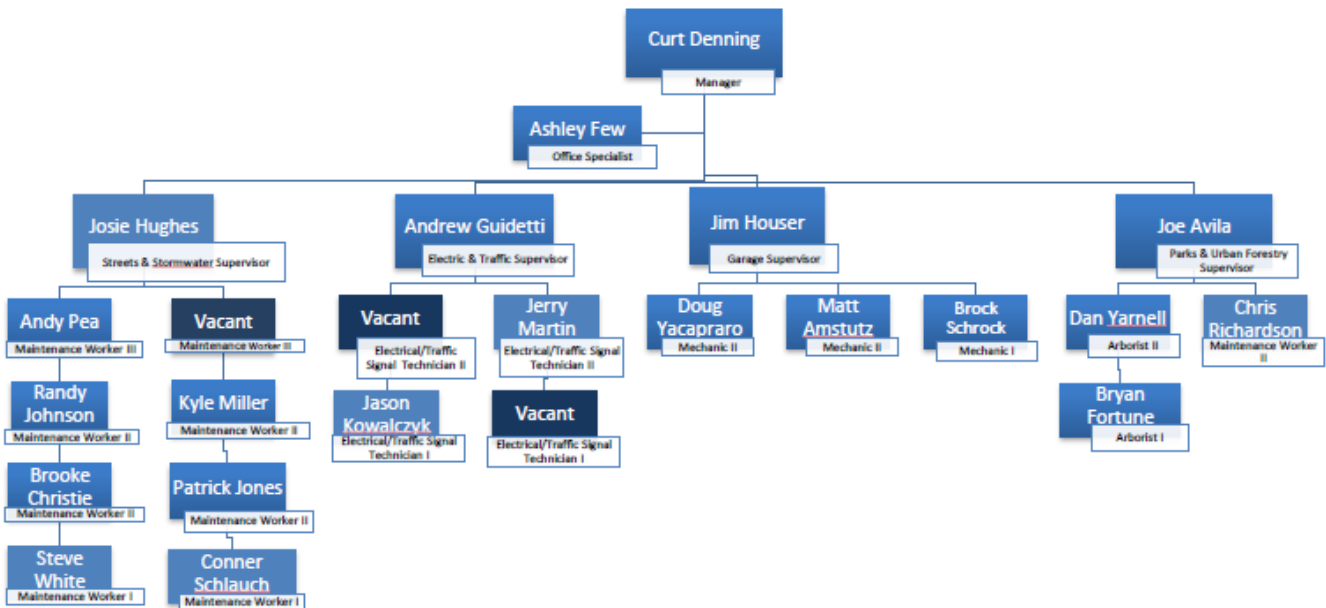
- MCM\_1. Public Education and Outreach
- MCM\_2. Public Participation/Involvement
- MCM\_3. Illicit Discharge Detection and Elimination
- MCM\_4. Construction Site Storm Water Runoff Control
- MCM\_5. Post-Construction Runoff Control
- MCM\_6. Pollution Prevention/Good Housekeeping for Municipal Operations

# Organization Chart:

## Engineering



## PPM





## MCM1: PUBLIC EDUCATION/OUTREACH

The SMPs for this control “*implement public education programs to distribute educational materials to the community or conduct equivalent outreach activities about the impacts of stormwater discharges on water bodies and the steps the public can take to reduce pollutants in stormwater runoff.*” The City of Wooster has chosen SMPs for public education and outreach, focusing on areas that can be quantifiable, utilizing more than one outreach mechanism, and covering at least five different stormwater themes or messages over the permit term. At least one stormwater public education program shall attempt to reach at least 50 percent of the City population over the permit term.

This control measure shall target students, homeowners, homeowner associations, commercial property owners, the general public (those visiting Wooster and non-homeowners), design firms, contractors, and developers. The City shall utilize the resources currently available to disseminate information, including but not limited to the following:

- The [City Internet Website](#);
- The [City GIS Website](#), including stormwater-themed maps;
- The [City Online Applications Portal](#);
- The [Online Reporting Center](#);
- Social media such as [Facebook](#), [Twitter](#), and [Instagram](#);
- Utility bill flyers and direct mailers;
- Topic-specific checklists, guides, handouts, or mailers;
- In-person events, meetings, or workshops;

The City has selected utility bill mailers as the primary quantifiable mechanism to reach at least 50 percent of the City population over the permit term. Currently, the City has approximately 14,000 residential utility accounts that a stormwater insert shall be included annually. The remaining public education/outreach SMPs were selected to address narrower focus groups that could substantially impact reducing pollutants in stormwater runoff, including but not limited to students, residents, commercial businesses, HOAs, contractors, developers, and design firms.

The education materials and strategies that the City shall implement over the permit period shall cover a variety of themes or messages, including but not limited to the following:

- Construction site, stormwater runoff management;
- Urban stormwater runoff pollution prevention;
- Water quality improvement associated with household/residential activities;
- Commercial activities, including restaurants, stormwater pollution prevention;
- Illicit discharge detection and elimination (IDDE).

The distribution of educational material addressing the abovementioned themes shall assist with stormwater pollution prevention and improving water quality by targeting the following pollutant sources:

- Sediment within construction site runoff;
- Inspection and maintenance of stormwater controls;
- Sanitary sewer/HSTS illicit discharges;
- Illicit discharges from commercial properties/activities;
- Litter and other debris are typical within urban areas.

The City has extended its stormwater education program for the public through a cooperative venture with the Wayne County SWCD via a memorandum of understanding related to stormwater education at the Wayne County Fair and in public schools. The Wayne County SWCD has a strong history of assisting local schools with environmental and water resource education and outreach programs. The City shall meet with Wayne County

SWCD to evaluate additional partnership opportunities to extend stormwater education within the City and through additional events and school programs.

<b>MCM1(a): Utility Bill Mailer, Stormwater Flyer</b>			
<b>Description of SMP:</b> The City shall include a stormwater flyer in all residential utility account mailings to increase Awareness of the City stormwater management program and the steps the public can take to reduce pollutants in stormwater runoff. Themes may include: Dump No Waste – Drains to Stream, landscaping and lawn care, pet waste management, residential car washing and maintenance, protection and maintenance of natural vegetative buffers along waterways, composting and management of grass clippings or yard wastes, and reporting stormwater issues or illicit discharges.			
<b>Mechanism</b>	<b>Responsible Party</b>	<b>Measurable Goal</b>	<b>TMDL</b>
Direct utility bill mailer	The City of Wooster, Engineering Division	Number of direct utility mailers	n/a
<b>Implementation Schedule</b>	<b>% Target Audience</b>	<b>Theme</b>	<b>Frequency</b>
2021-2026 (ongoing)	100% residential utility accounts, 50% percent of the City population	TBD on an annual basis	Annually
<b>The rationale for SMP:</b> Direct mailers to residential utility account holders present the highest probability of reaching at least 50 percent of the City population over the permit term—themes to be selected based upon a rotating schedule or prevalent need.			
<b>Target Audience:</b> Residential utility accounts and their families.			

<b>MCM1(b): Home Septic Treatment System (HSTS) Letter &amp; Flyer</b>			
<b>Description of SMP:</b> Annually, the City shall mail a letter or flyer to all property owners with a Home Septic Treatment System (HSTS) on their site. The flyer or letter shall address the importance of regular maintenance and inspection of their HSTS, good septic ownership practices, and points of contact with the City and Wayne County Environmental Health Department.			
<b>Mechanism</b>	<b>Responsible Party</b>	<b>Measurable Goal</b>	<b>TMDL</b>
Direct Mailing	The City of Wooster, Engineering Division	Number of direct HSTS letters	n/a
<b>Implementation Schedule</b>	<b>% Target Audience</b>	<b>Theme</b>	<b>Frequency</b>
2021-2026 (ongoing)	100% Residential, HSTS owners	TBD on an annual basis	Annually
<b>The rationale for SMP:</b> Home Septic Treatment Systems only account for a small percentage of the City population; however, a septic system is a potential point source that could substantially impact many downstream residents in the event of failure or improper maintenance.			
<b>Target Audience:</b> All HSTS owners			

<b>MCM1(c): Social Media, Stormwater &amp; Special Event Posts</b>			
<b>Description of SMP:</b> The City shall make social media posts quarterly utilizing platforms such as Facebook, Twitter, or Instagram. The post shall be stormwater-related links, cartoons, videos, or upcoming educational or participation event notices.			
<b>Mechanism</b>	<b>Responsible Party</b>	<b>Measurable Goal</b>	<b>TMDL</b>
Social Media Posts Facebook, Twitter, or Instagram	The City of Wooster, Engineering Division	One Post per Quarter, Number of hits per post	n/a
<b>Implementation Schedule</b>	<b>Target Audience</b>	<b>Theme</b>	<b>Frequency</b>
July 2022 – 2026 (evaluation)	General Public	Stormwater Awareness	Quarterly
<b>The rationale for SMP:</b> Previously, the City has attempted to disseminate information via mailers, brochures, and static web postings; however, it is challenging to quantify the number of readers. Social media presents a means to convey information to the public while receiving real-time input and quantifiable data.			
<b>Target Audience:</b> General public, residents			

**MCM1(d): Permanent Stormwater Control Inspection and Maintenance Letter**

**Description of SMP:** The City shall mail each private permanent stormwater control owner a reminder letter that inspections must be performed annually and the control regularly maintained. The letter shall also remind the owner that: a copy of the inspections and maintenance log shall be provided to the City no later than December 31<sup>(2)</sup> each year; a professional inspection is required once every five years; and reported non-routine maintenance addressed promptly. The first self-inspection annual maintenance logs shall be required to be provided to the City no later than December 2023, and the first professional Inspection by December 31, 2028.

Mechanism	Responsible Party	Measurable Goal	TMDL
Direct Mailing	The City of Wooster, Engineering Division	Number of direct letters	n/a
Implementation Schedule	% Target Audience	Theme	Frequency
2022 – Complete Inventory 2023 – First group of letters to Owners 2024 – First Owner Self-Inspection Due by December 31, 2024 2028 – First Professional Inspections	100% of stormwater control owners Estimated – total 408 <sup>(1)</sup> contols	Inspection and Maintenance	Annually

**The rationale for SMP:** Over 400<sup>(1)</sup> permanent stormwater controls have been identified in the City MS4 area. Many of the controls were constructed before the City became an MS4. Therefore, the City is still working on determining ownership and responsible parties on 15 to 20 percent of the controls. The inventory shall be completed in the Fall of 2022, and initial letters shall be sent to the responsible parties for each control or group of controls. Each owner shall be notified of their responsibilities per Ohio EPA requirements for permanent stormwater controls. Subsequently, the owners shall be responsible for completing a self-inspection each year, performing regular maintenance on the permanent control, and a professional inspection every 5-years.

Notifications shall be staged over the permit term beginning in the Spring of 2023, with the first group focusing on residential stormwater controls for private and public residential developments and accounting for about 60 permanent stormwater controls.

**Target Audience:** Permanent Stormwater Control Owners (Residential and Commercial), HOAs

**MCM1(e): Student and Adult Education Programs**

**Description of SMP:** Through a cooperative with the Wayne County SWCD, the City offers educational programs to students and adults. The School programs are for K through 12 and are adjusted to meet any specific grade, topic, or class size. Topics can pertain to the importance of clean water, the value of trees, helping the environment through one’s actions, and groundwater movement. Adult programs are offered at the Wayne County Fair for 5 to 6 days in August each year.

Mechanism	Responsible Party	Measurable Goal	TMDL
Student/Adult Education Programs	Wayne County SWCD	5 to 10 programs per year	n/a
Implementation Schedule	Target Audience	Theme	Frequency
2021-2026 (ongoing)*	2000-3000 Participants	Stormwater Education	As Requested

**The rationale for SMP:** The Wayne County SWCD has an excellent track record for providing educational opportunities to students and adults. They have developed numerous programs that address steps the public can take to reduce pollutants in stormwater runoff.

**Target Audience:** Students (k-12) and adult residents

\*COVID-19 heavily impacted 2020/2021 participation

### MCM1(f): Web-based Informational Systems

**Description of SMP:** The City is finalizing updates to our GIS system and websites and shall make available themed stormwater information to the public. The information shall be available on the [City](#) or the [City GIS Website](#).

Mechanism	Responsible Party	Measurable Goal	TMDL
Web-Based Information Systems	The City of Wooster, Engineering Division	Number of hits per site or stormwater theme	n/a
Implementation Schedule	% Target Audience	Theme	Frequency
2022-2026 (in development)	TBD	Stormwater Information	As Requested

**The rationale for SMP:** The Internet provides a means to reach a diverse audience using readily available means. The City shall develop themed stormwater information for the public that can be easily customized to meet the users' needs. Specific maps and themes shall be developed and deployed as needed or based on user feedback.

**Target Audience:** students, homeowners, homeowner associations, commercial property owners, the general public, design firms, contractors, and developers

## MCM2: PUBLIC PARTICIPATION/INVOLVEMENT

The City of Wooster recognizes that a successful stormwater program relies not only on the MS4 owners, operators, and the regulatory community but also on the general public's input, assistance, and understanding. The City's program includes means and methods to give the public opportunity to play an active role in both the development and implementation of the NPDES Phase II program.

The SMPs for this section *"require public involvement/participation efforts to 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."* The City's public involvement/participation programming must include at least five (5) public involvement activities over the permit term (one per permit year). The permit requires documentation of the number of people participating in events.

To evaluate the success of this portion of the overall program, the City shall annually review the number of people participating in the public events and the tracking of water quality-related concerns and complaints received by the City from the public. The program can be modified based on the annual review results and determine if additional public events are needed to target specific audiences or stormwater themes.

### MCM2(a): Community Stream or Park Cleanup

**Description of SMP:** The City Parks and Recreation Division shall work with groups of volunteers to complete the stream or park cleanup projects.

Mechanism	Responsible Party	Measurable Goal	TMDL
Cleanup Events	The City of Wooster, Parks and Recreation	1 to 2 programs per year, Number of participants	n/a
Implementation Schedule	% Target Audience	Theme/Message	Frequency
2021-2026 (ongoing)*	50-100 Participants	Community Cleanup	Annually

**The rationale for SMP:** Engaging the public in a stream or park cleanup provides an opportunity for education and outreach while also cleaning up the areas.

**Target Audience:** General public, citizen/student groups

\*COVID-19 heavily impacted 2020/2021 participation

**MCM2(b): Citizen Reporting Center (Stormwater Issues)/Direct Reports via Phone or Email**

**Description of SMP:** The City shall maintain an [Online Reporting Center](#) and direct reporting methods (such as phone or email) that can be utilized to report stormwater-related issues by the community or City employees.

Mechanism	Responsible Party	Measurable Goal	TMDL
Web Reporting	The City of Wooster, Engineering Division	Number of reports	n/a
Implementation Schedule	% Target Audience	Theme/Message	Frequency
2021-2026 (ongoing/under review)	10-15 Reports per year (est)	Stormwater Awareness	As Reported

**The rationale for SMP:** A reporting center provides a method to engage the public and City employees in monitoring and reporting stormwater or other issues. This program is currently under review to improve public participation or consider alternatives because of low participation or promotion of the service.

**Target Audience:** General public, citizen/student groups, City employees

**MCM2(c): Commercial Awareness Program**

**Description of SMP:** The City is implementing a new program focusing on commercial businesses within the City of Wooster that could potentially impact stormwater. The program shall initially include residential and commercial contractors, developers and design firms, and commercial businesses that can most directly impact the MS4 but shall be expanded and modified over the permit term.

Mechanism	Responsible Party	Measurable Goal	TMDL
Direct or Electronic Mailing	The City of Wooster, Engineering Division	The number of flyers, notices, letters, or emails.	n/a
Implementation Schedule	% Target Audience	Theme/Message	Frequency
2022-2026 (in development)	Commercial Businesses	TBD	TBD

**The rationale for SMP:** In reviewing the City MS4 plan for the new permit renewal, several areas were noted that provide excellent opportunities to address point sources that could substantially impact City MS4. Preliminary areas to be addressed for entities working or operating within the MS4 include,

- Carpet cleaning and the proper disposal of waste at the City treatment facility;
- Developers and design firms regarding Awareness of the City stormwater program, program modifications, and the current program requirements;
- Residential building contractors and requirements for site controls;
- Commercial building contractors and typical issues and common topics about building site inspections;
- Commercial developments and preventative maintenance to reduce stormwater impacts and long-term issues.

**Target Audience:** contractors, design firms, developers, commercial businesses

**MCM2(d): Residential Awareness Program**

**Description of SMP:** The City shall request feedback and input from the design and development community, city divisions, and the general public regarding proposed changes to the City stormwater management plan.

Mechanism	Responsible Party	Measurable Goal	TMDL
Public Awareness Program	The City of Wooster, Engineering Division	The number of flyers, notices, letters, or emails	n/a
Implementation Schedule	Target Audience	Theme/Message	Frequency
2021-2026 (in development)	Residential Property Owners	TBD	TBD

**The rationale for SMP:** The City shall provide the public with information focused on areas that most substantially can impact the MS4. Topics may include Home Septic Treatment Systems (HSTS), properties adjoining riparian/wetland areas, yard waste and debris disposal, household hazardous waste disposal and

**Target Audience:** General public, citizen groups, HOA/POAs

## MCM3: ILLICIT DISCHARGE DETECTION AND ELIMINATION

The City of Wooster has developed an Illicit Discharge Detection and Elimination (IDDE) Plan based on six key factors. The plan is intended to meet the Ohio EPA MS4 permit requirement to “*develop, implement and enforce a program to detect and eliminate illicit discharges, as defined in Part VI of this permit, into your small MS4. For illicit discharges to your small MS4 via an adjacent, outside of your jurisdiction, interconnected MS4, you are only required to immediately inform the neighboring MS4 and inform Ohio EPA in your annual report*”. The factors the City has selected within the IDDE Plan include:

- **Implement** an IDDE Ordinance or Other Regulatory Mechanism;
- **Review** a systematic mapping and inventory of the MS4 system and historical information;
- **Inspect** critical features of the MS4 system, including but not limited to HSTS, hot spots, outfalls, permanent stormwater control measures, and reported events;
- **Detect** potential issues and impacts to the MS4 from inspections or reports;
- **Investigate** the findings to establish illicit connections and identify the source;
- **Enforce** actions to remove the potential source and resolve the issue;

The City of Wooster has adopted ordinances and regulations that address prohibited or illicit discharges and included applicable sections in the City of Wooster *Site Development and Improvement Manual* to address this SMP. The IDDE regulations are reviewed annually to confirm compliance with Ohio EPA requirements and adjust the plan. The City is reviewing the sections of the *Site Development and Improvement Manual* that form the City IDDE Plan and considering drafting a standalone IDDE Plan document and include by reference in the City Ordinances.

### [Codified Ordinances of the City Of Wooster, OH – Chapter 925, Storm Drainage](#)

925.05 Adoption of Development and Improvement Manual

925.06 Prohibited Discharges to Municipal Separate Storm Sewer System

925.07 Watercourse Protection and Prohibited Discharges

### [City of Wooster, Site Development and Improvement Manual](#)

Section 11: Prohibited Discharges

Section 12: Illicit Discharge

Section 13: Inspection, Enforcement Action, and Penalties

The City of Wooster continually reviews a comprehensive stormwater system map maintained in the City GIS system. The City stormwater map has been compiled from historical records, archived plans, and physical inspection of the existing network. Regular updates to the map are made as new areas are developed or modifications are made to the existing stormwater system. The GIS system has been extended to include HSTS and permanent stormwater controls. A comprehensive audit is underway, and approximately 50% of the MS4 has been physically inspected and field verified during the last MS4 permit term.

During the prior two MS4 permit terms, the City of Wooster has performed outfall screenings for all known outfalls over each five-year permit term. Several identified illicit connections to the City network were subsequently resolved. The City intends to continue outfall screenings; however, the scope of the outfall screening shall be reduced to focus on outfalls in commercial and industrial zoning areas, areas likely more susceptible to illicit discharges or related to HSTS, and permanent stormwater controls. Residential dry weather screenings shall continue, focusing on primary discharge points and stormwater collector locations. Detected dry weather flows in these areas that have not been identified and evaluated shall be investigated.

The City has partnered with the Wayne County Environmental Health Department to address Home Septic Treatment Systems (HSTS) within the City MS4 area. Wayne County, Environmental Health Department, shall perform periodic inspections of HSTS within the City MS4 and ensure each location is on a maintenance schedule

and functioning as designed. Furthermore, they shall work with the City Engineer to address problematic or failing HSTS, including a financial assistance program - The Water Pollution Control Loan Fund (WPCLF).

The City IDDE Plan shall be reviewed annually to ensure continued compliance with the current Ohio EPA permit requirements and the effectiveness of the minimum control measures implemented. During the review, the processes implemented shall be evaluated for effectiveness, and focus areas adjusted. Should the EPA assign TMDL requirements for any watersheds with the City MS4 or provide specific water testing requirements, the City shall implement appropriate modifications to the IDDE plan.

To evaluate the success of this portion of the overall program, the City shall review water quality concerns as reported by the public and the results of the stormwater outfall dry weather screenings and compare the results to the screenings conducted under the previous SWMP. Based on the review results, the program can be modified and determine if additional public education mechanisms are needed to target specific audiences or stormwater pollutants.

<b>MCM3(a): IDDE Ordinance or Other Regulatory Mechanism (EPA Specified)</b>			
<b>Description of SMP:</b> The City shall, to the extent allowable under State or local law, effectively prohibit, through ordinance, or other regulatory mechanisms, illicit discharges into your storm sewer system and implement appropriate enforcement procedures and actions.			
<b>Mechanism</b>	<b>Responsible Party</b>	<b>Measurable Goal</b>	<b>TMDL</b>
City Ordinance/Regulation	The City of Wooster, Engineering Division	Implement and maintain IDDE Ordinance	n/a
<b>Implementation Schedule</b>	<b>Completed</b>	<b>Theme/Message</b>	<b>Frequency</b>
2021-2026 (ongoing)	Yes	IDDE Ordinance	Ongoing
<p><b>The rationale for SMP:</b> EPA mandated requirement to implement and maintain an IDDE ordinance or regulation</p> <p><a href="#">Codified Ordinances of the City Of Wooster, OH – Chapter 925, Storm Drainage</a></p> <p>925.05 Adoption of Development and Improvement Manual</p> <p>925.06 Prohibited Discharges to Municipal Separate Storm Sewer System</p> <p>925.07 Watercourse Protection and Prohibited Discharges</p> <p><a href="#">City of Wooster, Site Development and Improvement Manual</a></p> <p>Section 11: Prohibited Discharges</p> <p>Section 12: Illicit Discharge</p> <p>Section 13: Inspection, Enforcement Action, and Penalties</p>			

<b>MCM3(b): Storm Sewer System Map (EPA Specified)</b>			
<b>Description of SMP:</b> The City shall maintain a comprehensive storm sewer system map, including the information required by the current OEPA MS4 permit.			
<b>Mechanism</b>	<b>Responsible Party</b>	<b>Measurable Goal</b>	<b>TMDL</b>
GIS-based mapping and web app(s)	The City of Wooster, Engineering Division	Maintain and update a map of the MS4 system	n/a
<b>Implementation Schedule</b>	<b>Completed</b>	<b>Theme/Message</b>	<b>Frequency</b>
2021-2026 – System Update	Yes	Public Information, IDDE	Ongoing
2022-2026 – Add Ditches	No		
2022 – public web maps for including permanent SMCs, and HSTS	No		
<p><b>The rationale for SMP:</b> The City shall maintain a publicly accessible comprehensive storm sewer system map. The map shall include a minimum of surface waters of the State, outfalls, MS4 area, catch basins, pipes, ditches, flood control facilities (retention/detention ponds), and post-construction water quality SMCs (public and private), and HSTS.</p>			

**MCM3(c): Illicit Discharge Detection and Elimination (IDDE) Plan (EPA Specified)**

**Description of SMP:** The City shall develop and implement a program to detect and eliminate non-stormwater discharges, including illegal dumping, to the City MS4 system. The IDDE Plan focuses on the previously noted factors: Implement, Review, Inspect, Detect, Investigate, Enforce, and Evaluate. These are expanded upon in the City IDDE Plan and included in the subsequent MCM3 items.

Mechanism	Responsible Party	Measurable Goal	TMDL
IDDE Plan	The City of Wooster, Engineering Division	Maintain and implement an effective IDDE plan	n/a
Implementation Schedule	Completed	Theme/Message	Frequency
2021-2026 (ongoing)	Yes	Illicit Discharge Detection and Elimination	Ongoing
2022-2023 – IDDE plan update	No		

**The rationale for SMP:** Detection and elimination of illicit connections and discharges to the City MS4 is essential to the City of Wooster stormwater management plan as non-stormwater discharges have the highest potential impact on the waters of the MS4.

**MCM3(d): HSTS Mapping/List and Monitoring (EPA Specified)**

**Description of SMP:** The City shall develop a list of all onsite sewage disposal systems, including HSTS, located within the City and connected or discharging to the MS4. Additionally, the City shall draft a storm sewer map showing the location of all HSTS.

Mechanism	Responsible Party	Measurable Goal	TMDL
GIS-based mapping and information	The City of Wooster, Engineering Division	Maintain a current HSTS map and list for the MS4	n/a
Implementation Schedule	Completed	Theme/Message	Frequency
2021-2026 (ongoing)	Yes	HSTS information, IDDE	Ongoing
2022 – Public HSTS web map and info (in development)	No		

**The rationale for SMP:** Onsite sewage disposal systems and HSTS are potential sources of illicit discharge and require regular inspection and maintenance to be in good working order. Identifying these locations and confirming functionality is vital to ensuring minimal impacts on the MS4. The City shall review the HSTS map as part of the City's long-term management plan to alleviate concentrations of HSTS when possible.

**MCM3(e): Dry-Weather Screening of Outfalls and Stormwater System (EPA Specified)**

**Description of SMP:** The City shall perform regular screenings of outfalls and other components of the City stormwater system as a means to detect and eliminate illicit discharges systematically

Mechanism	Responsible Party	Measurable Goal	TMDL
Dry Weather Screenings	The City of Wooster, Engineering Division	Number of outfalls screened	n/a
Implementation Schedule	Completed	Theme/Message	Frequency
2021-2026 (ongoing)	Yes	IDDE	As Requested

**The rationale for SMP:** The City shall continue to screen outfalls during dry weather to eliminate illicit discharges to the MS4. The City has completed two inspection cycles of all known outfalls and eliminated multiple illicit connections as part of that program. Dry weather outfall screening shall continue; however, screening shall focus on commercial, industrial, and priority areas. Furthermore, dry weather screenings shall be performed as part of the City stormwater system audit within the network as part of the inspection process.



## MCM4: CONSTRUCTION SITE, STORMWATER RUNOFF CONTROL

The City of Wooster has developed a stormwater runoff control program to address construction sites as part of the overall stormwater management plan. The intent is to meet the Ohio EPA MS4 permit requirement to *“develop, implement, and enforce a program to reduce pollutants in any stormwater runoff to [the City] small MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. Reduction of pollutants in stormwater discharges from construction activity disturbing less than one acre shall be included in your program if that construction activity is part of a larger common plan of development or sale that would disturb one acre or more.”*

The City of Wooster has adopted ordinances and regulations that address construction site stormwater and runoff control and have included applicable sections in the City of Wooster *Site Development and Improvement Manual* to address this SMP. The regulations for this MSM are reviewed annually to confirm compliance with Ohio EPA requirements and address current issues or needs of the community.

### [Codified Ordinances of the City Of Wooster, OH – Chapter 925, Storm Drainage](#)

925.05 Adoption of Development and Improvement Manual

### [City of Wooster, Site Development and Improvement Manual](#)

Section 4: Permitting

Section 5: Drainage Plan

Section 6: Stormwater Management Plan (SMP)

Section 7: Construction

Section 13: Inspection, Enforcement Action, and Penalties

### [Ohio Rainwater and Land Development Manual](#)

Residential construction projects (1-family to 3-family homes or additions) must obtain a City General Residential Stormwater Management Permit as part of the Building Standards (BDS) permitting process. This permit outlines the stormwater practices common to residential construction and the minimum requirements. Contractors must, at a minimum, install perimeter controls before commencing any earth-disturbing activities, place a construction drive, and have a concrete washout and dumpster available onsite. BDS is responsible for performing a minimum of monthly inspections and reporting deficiencies to the City Engineering division for enforcement. For residential lots that are part of a residential development, the contractor must obtain an Individual Lot Notice of Intent from the Ohio EPA if they are not the original Ohio EPA Notice of Intent (NOI) holder.

Commercial and development construction projects must obtain a Development Permit from the City Engineering division and coverage under the Ohio EPA General Construction Stormwater Permit if more than one acre is disturbed. The City requires the Ohio EPA [Stormwater Pollution Prevention Plan Checklist](#) to be utilized for all development permits on stormwater compliance. The contractor or developer must complete the checklist and provide references to each applicable item before submitting the plans and SWP3. The City staff engineer then reviews the information and comments on any deficiencies or requests clarification to address any ambiguity.

The Engineering development permit process is outlined in Section 4 of the City Site Development and Improvement Manual, and a Drainage Plan and Stormwater Management Plan (SMP) requirements are in Sections 5 and 6 of the manual, respectively.

The City has implemented standards for developers, operators, and contractors that address appropriate erosion and sediment controls as part of their Stormwater Pollution Prevention Plan (SWP3). These standards utilize the [Ohio Rainwater and Land Development Manual](#) as the foundation of the construction stormwater program. The standards are reviewed as part of the permitting process, discussed during a pre-construction meeting, and enforced during construction. Section 7 - of the City Site Development and Improvement Manual outlines typical stormwater practices and requirements for construction projects.

The City Engineering division shall, at a minimum, perform monthly inspections of all projects with an active development permit. The inspector shall review the SWP3 documentation to ensure appropriate controls are in place, the contractor or developer performs required weekly and post-storm inspections, the controls are appropriately installed and functionally as intended, and inform the SWP3 personnel of any issues noted during the inspection.

Deficiencies noted and reported to a contractor or developer serve as a Notice of Non-Compliance, whether provided in an email, written Inspection, or electronic Inspection. The contractor or developer has 10 days to implement corrective measures, or a Notice of Violation shall be issued. Should a contractor or developer continue to disregard City notices, the City escalation policy shall be followed, including possible stop-work orders, punitive fines, or legal action per Section 13 of the City Site Development and Improvement Manual.

As part of the construction stormwater inspection program, the City utilizes public reporting and involvement. The City stormwater management team cannot be everywhere at all times; therefore, the City has made an [Online Reporting Center](#) available to anyone with internet access to file complaints, ask questions or provide other observations to the City of Wooster. The public may also contact any City division or employee in person or via telephone. Complaints are processed in compliance with the City IDDE plan procedures.

The City has implemented a financial stormwater guarantee requirement for all development permits based on the total disturbed area of the site. A bond, irrevocable promissory note, or cash must be posted for \$1,500 plus \$1,500 per acre or portion thereof by the owner or the contractor/developer on their behalf. The City shall exercise against the bond if a contractor, developer, or owner fails to comply with City stormwater management notices of violation or to complete post-construction requirements. The guarantee is released once all work is complete and post-construction requirements are met. The City is evaluating requiring a stormwater guarantee for residential projects as there has been a pronounced increase in non-compliance on residential construction sites.

<b>MCM4(a): Ordinance or Other Regulatory Mechanism (EPA Specified)</b>			
<b>Description of SMP:</b> The City of Wooster shall adopt an ordinance or other regulatory mechanism to require erosion and sediment controls, non-sediment pollutant controls on construction sites, and sanctions to ensure compliance to the extent allowable under State or local law.			
<b>Mechanism</b>	<b>Responsible Party</b>	<b>Measurable Goal</b>	<b>TMDL</b>
Ordinance or Other Regulatory Mechanism	The City of Wooster, Engineering Division	Meet current Ohio EPA requirements	n/a
<b>Implementation Schedule</b>	<b>Completed</b>	<b>Theme/Message</b>	<b>Frequency</b>
2021-2026 (ongoing)	Yes	Stormwater Regulation	Ongoing
<b>The rationale for SMP:</b> The City is mandated to develop, implement, and enforce a program to reduce pollutants in any stormwater runoff to the City’s small MS4 from construction activities that result in a land disturbance. The City of Wooster <i>Site Development and Improvement Manual</i> was adopted by ordinance and functions as a regulatory mechanism to reduce pollutants in any stormwater from construction activities.			
<a href="#">Codified Ordinances of the City Of Wooster, OH – Chapter 925, Storm Drainage</a> 925.05 Adoption of Development and Improvement Manual <a href="#">City of Wooster, Site Development and Improvement Manual</a> Section 4: Permitting Section 5: Drainage Plan Section 6: Stormwater Management Plan (SMP) Section 7: Construction Section 13: Inspection, Enforcement Action, and Penalties <a href="#">Ohio Rainwater and Land Development Manual</a>			
<b>Target Audience:</b> Owners, Developers, Operators, and Contractors			

**MCM4(b): Sediment and Erosion Control Requirements (EPA Specified)**

**Description of SMP:** The City shall develop and implement construction stormwater standards to eliminate stormwater runoff to the City's small MS4 from construction activities to the maximum extent possible.

Mechanism	Responsible Party	Measurable Goal	TMDL
Construction Stormwater Standards	The City of Wooster, Engineering Division	Standards being used and enforced	n/a
Implementation Schedule	Completed	Theme/Message	Frequency
2021-2026 (ongoing)	Yes	Stormwater Standards	Ongoing

**The rationale for SMP:** The City shall ensure standards are in place for owners, developers, designers, operators, and contractors are implementing appropriate erosion and sediment controls as part of the Stormwater Pollution Prevention Plan (SWP3) development and during construction activities. The City has implemented a *Site Development and Improvement Manual* and adopted the *Ohio Rainwater and Land Development Manual* to address construction stormwater standards.

**Target Audience:** Owners, Developers, Design Firms, Operators, and Contractors

**MCM4(c): Complaint Process (EPA Specified)**

**Description of SMP:** The City shall provide a means for anyone to file a complaint with the City regarding construction stormwater runoff or any other type of illicit discharge. Anyone can submit a complaint via the City [Online Reporting Center](#), call any City division, or speak with any City employee.

Mechanism	Responsible Party	Measurable Goal	TMDL
Public Complaints and Reports	The City of Wooster, Engineering Division	Number of Complaints and Follow-ups	n/a
Implementation Schedule	Completed	Theme/Message	Frequency
2021-2026 (ongoing)	Yes	Public Participation	As Reported

**The rationale for SMP:** The City must rely on the public, contractors, and City employees to report incidents that the stormwater management team may not directly observe. The City has made available multiple means to contact the appropriate City personnel; however, minimal responses are provided annually. This program is being evaluated for alternative methods of enticing public participation because of low participation numbers.

**Target Audience:** General Public, Contractors, and City employees

**MCM4(d): Site Plan Review Procedures (EPA Specified)**

**Description of SMP:** The City shall complete a plan review for all new development permits issued by the City of Wooster Engineering division. The review shall meet the Ohio EPA permitting requirements and City stormwater regulations for evaluating an SWP3, incorporating consideration of potential water quality and downstream impacts regarding construction stormwater.

Mechanism	Responsible Party	Measurable Goal	TMDL
Plan Review and Approval	The City of Wooster, Engineering Division	Number of Projects Reviewed	n/a
Implementation Schedule	Completed	Theme/Message	Frequency
2021-2026 (ongoing)	Yes	SWP3 Compliance	As Requested

**The rationale for SMP:** The City of Wooster Engineering Division must review all development and commercial plans to ensure compliance with the current Ohio EPA General Construction Stormwater Permit and the City Small MS4 Permit requirements. Plans shall be reviewed as part of the City Development Permit process and following the City of Wooster *Site Development and Improvement Manual* Section 4: Permitting, Section 5: Drainage Plan, Section 6: Stormwater Management Plan, and Section 7: Construction within the manual. A quantifiable review process using an approved Ohio EPA checklist shall be implemented to ensure compliance and consistency.

**Target Audience:** Builders, Developers, Contractors, Design Firms, Owners

**MCM4(e): Site Inspection Procedures (EPA Specified)**

**Description of SMP:** The City shall implement an inspection program for all active construction projects. The program shall ensure appropriate erosion and sediment controls are utilized and the waste at construction sites is appropriately handed, minimizing adverse impacts on water quality.

Mechanism	Responsible Party	Measurable Goal	TMDL
Inspection, Quality Assurance	The City of Wooster, Engineering Division	Number of Inspections	n/a
Implementation Schedule	Completed	Theme/Message	Frequency
2021-2026 (ongoing)	Yes	Construction Stormwater Inspection	Monthly

**The rationale for SMP:** To confirm contractors and developers are implementing a stormwater plan, the City must perform monthly site inspections at a minimum. During the inspections, the City shall confirm that appropriate stormwater controls are being utilized per the designed stormwater plan, regular maintenance and inspections are being performed, and note any deficiencies. Subsequently, the City shall issue notices for any issues found and follow the City escalation policy if an operator fails to comply with stormwater regulations.

**Target Audience:** Construction Sites

**MCM4(f): Enforcement Procedures (EPA Specified)**

**Description of SMP:** The City shall ensure compliance with erosion and sediment control regulatory mechanisms, including the sanctions and enforcement mechanisms to ensure compliance. The City has developed an enforcement escalation plan describing the procedures for when sanctions shall be utilized – this is outlined in section 1316 of the City *Site Development and Improvement Manual*.

Mechanism	Responsible Party	Measurable Goal	TMDL
Compliance Enforcement	The City of Wooster, Engineering Division	Number and Type of Enforcement Actions	n/a
Implementation Schedule	Completed	Theme/Message	Frequency
2021-2026 (ongoing)	Yes	Stormwater Compliance	As Needed

**The rationale for SMP:** To ensure operators comply with Ohio EPA and City construction stormwater requirements, the City shall utilize sanctions, including notices of non-compliance, notices of violation, stop-work notices, punitive fines, or exercise against stormwater guarantees. The City Inspection, Enforcement Action, and Penalties are outlined in Section 13 of the City *Site Development and Improvement Manual*.

**Target Audience:** Owners, Operators, Developers, Contractors

**MCM4(g): Stormwater Guarantee and Post-Construction Release**

**Description of SMP:** To enforce compliance with stormwater regulations, the City shall require the owner or agent to provide a financial stormwater guarantee of \$1,500 plus \$1,500 per acre or portion thereof. The guarantee shall be a bond, irrevocable promissory note, or cash payable to the City of Wooster.

Mechanism	Responsible Party	Measurable Goal	TMDL
Compliance Enforcement	The City of Wooster, Engineering Division	Number of Bonds Issued	n/a
Implementation Schedule	Completed	Theme/Message	Frequency
2021-2026 (ongoing)	Yes	Stormwater Compliance	Per Project

**The rationale for SMP:** The City often could not get an operator to implement or correct a deficiency in stormwater controls or complete post-construction documentation. The City subsequently requires the owner or operator to post a guarantee that the City shall exercise against should an impasse be reached, and the escalation policy has been followed. The guarantee shall be exercised against should the owner, operator, developer, or contractor fail to follow a City issued Notice of Violation for stormwater compliance. The City also requires all post-construction documentation to be provided to release the guarantee:

- the site must be fully stabilized;
- perimeter controls removed and permanent control configured for post-construction;
- an Ohio EPA confirmation letter is provided of a NOT filed with the Ohio EPA when covered under an NOI;
- a stormwater maintenance agreement is recorded between the City and the owner;
- an engineering certification is provided for any permanent stormwater control installed or modified as part of the project with an owner acknowledgment of receipt and understanding of a stormwater maintenance plan;
- an operation and maintenance plan is provided;
- recorded easements for any shared stormwater controls or controls not located directly on the lot being served;
- an operation and maintenance plan is provided;
- and for developments - all the lots have been sold and transferred.

**Target Audience:** Owners, Operators, Developers, Contractors

#### MCM4(h): Pre-Construction Meeting

**Description of SMP:** The City has implemented a policy requiring pre-construction meetings at City Hall before any development or commercial project breaks ground. A portion of the meeting shall address stormwater management, including expectations, requirements, inspections, determination of responsibility, scheduling, and post-construction requirements.

Mechanism	Responsible Party	Measurable Goal	TMDL
Pre-construction meeting	The City of Wooster, Engineering Division	Number of pre-construction meetings	n/a
Implementation Schedule	Completed	Theme/Message	Frequency
2021-2026 (ongoing)	Yes	Stormwater Management	Per Project

**The rationale for SMP:** Often, there is a breakdown in communications about expectations and requirements for stormwater management and who is responsible. The City has implemented a pre-construction meeting requirement to discuss who is responsible, what is expected of each party involved, when inspections are to be performed, where controls are to be implemented, and how issues shall be escalated.

**Target Audience:** Owners, Contractors, Developers

## MCM5: POST-CONSTRUCTION STORMWATER MANAGEMENT

The City of Wooster has developed a post-construction stormwater management program to address post-construction stormwater runoff as part of the overall stormwater management plan. The intent is to meet the Ohio EPA MS4 permit requirement to provide continuous oversight of new and existing post-construction stormwater management systems to minimize water quality and downstream impacts. The City shall act as the regulatory, advisory, and enforcement agents for the system’s long-term viability, maintenance, and operation.

To address this SMP, the City of Wooster has adopted ordinances and regulations that address post-construction stormwater management in applicable sections in the City of Wooster *Site Development and Improvement Manual*. The regulations for this MSM are reviewed annually to confirm compliance with Ohio EPA requirements and address current issues or needs of the community.

[Codified Ordinances of the City Of Wooster, OH – Chapter 925, Storm Drainage](#)

925.05 Adoption of Development and Improvement Manual

[City of Wooster, Site Development and Improvement Manual](#)

Section 8: Post-Construction

Section 9: Operation and Maintenance of Stormwater Controls

Section 10: Protection of Watercourses and Wetlands

Section 13: Inspection, Enforcement Action, and Penalties

[Ohio Rainwater and Land Development Manual](#)

Commercial and development construction projects must obtain a Development Permit from the City Engineering division and coverage under the Ohio EPA General Construction Stormwater Permit if more than one acre is disturbed. The City requires the Ohio EPA [Stormwater Pollution Prevention Plan Checklist](#) to be utilized for all development permits to confirm stormwater compliance. The contractor or developer must complete the checklist and provide references to each applicable item before submitting the plans and SWP3. The City staff engineer then reviews the information and comments on any deficiencies or requests clarification to address any ambiguity.

During the past MS4 permit term, the City has been working on addressing new and existing post-construction controls installed as part of development projects. An inventory is being completed based on historical information and site visits to identify potential permanent stormwater controls. The City is still attempting to ascertain ownership and responsibility of all the controls for which work shall continue into the current MS4 permit term. Beginning on July 1, 2017, the owners of all new permanent stormwater controls must provide the following before the City releases a financial stormwater guarantee for each project.

- A stormwater operations and maintenance plan addressing each permanent stormwater control installed as part of the project – required as part of the development permitting process;
- An engineering certification stating that any controls installed or modified as part of the project was constructed as designed and an owner acknowledgment that the stormwater engineer has reviewed an O&M plan with the owner and conveyed long-term obligations;
- A recorded stormwater inspection and maintenance agreement between the City and the owner that requires annual inspection and regular maintenance of permanent stormwater controls;
- A copy of the Ohio EPA Notice of Termination (NOT) letter for projects covered under an NOI;
- A platted easement bounding any permanent stormwater control and maintenance access way to a public right of way; and
- The owner shall provide a recorded easement for any permanent stormwater control not contained within a single lot/campus or shared control between multiple entities.

The City is evaluating how to handle permanent stormwater controls constructed before July 1, 2017, especially before the City became an MS4 in 2004. All known permanent stormwater management controls have been included in a City inventory, a cursory inspection was performed by City personnel, and historical documentation is collected when available. The City still collects details about each SMC, including the type, owner, and responsible party.

In 2023, the City shall begin sending out informational notices to owners of permanent stormwater controls constructed before 2017. The notice shall inform owners of their obligations to inspect, maintain and repair permanent stormwater controls that serve their site per the original requirements of the development permit issued by the City or Ohio EPA NPDES coverage obtained from the Ohio EPA. The City shall issue the notices over the current permit term to maintain a manageable workload for the stormwater management team. The following requirements shall be conveyed to the owners:

- The owner or agent shall perform an annual self-inspection for each permanent stormwater control on a site. A copy of an inspection report shall be provided to the City no later than December 31<sup>(2)</sup> for the prior year.
- A copy of an operation and maintenance (O&M) plan shall be provided to the City that covers each permanent stormwater control. If a site does not have an O&M plan, the Ohio EPA [Maintaining Stormwater Control Measures – Guidance for Private Owners & Operators Manual](#) can be utilized in the interim.
- Regular maintenance shall be performed and logged for each control regularly. A copy of the maintenance logs shall be provided to the City with the annual inspection reports.
- The owner shall have a qualified individual perform a professional inspection every five years, and the findings shall be reported to the City. The first professional inspection shall be completed before

December 31, 2028, during which the site's operation and maintenance plan shall be updated or developed as needed.

- Once a site has a developed O&M plan, a maintenance and inspection agreement shall be executed and recorded between the owner and the City.

<b>MCM5(a): Ordinance or Other Regulatory Mechanism (EPA Specified)</b>			
<b>Description of SMP:</b> The City of Wooster shall adopt an ordinance or other regulatory mechanism to address post-construction runoff from development and redevelopment sites to the extent allowable under State or local law. The City shall act as the regulatory, advisory, and enforcement agents for the long-term viability, maintenance, and operation of permanent stormwater controls			
<b>Mechanism</b>	<b>Responsible Party</b>	<b>Measurable Goal</b>	<b>TMDL</b>
Ordinance or Other Regulatory Mechanism	The City of Wooster, Engineering Division	Maintain Ordinance/Regulation	n/a
<b>Implementation Schedule</b>	<b>Completed</b>	<b>Theme/Message</b>	<b>Frequency</b>
2021-2026 (ongoing)	Yes	Stormwater Regulation	Ongoing
<b>The rationale for SMP:</b> The City must develop, implement, and enforce a program to address stormwater runoff from development and redevelopments that discharge to the City's small MS4. The City of Wooster <i>Site Development and Improvement Manual</i> was adopted by ordinance and functions as a regulatory mechanism to reduce pollutants in post-construction runoff.			
<a href="#">Codified Ordinances of the City Of Wooster, OH – Chapter 925, Storm Drainage</a> 925.05 Adoption of Development and Improvement Manual <a href="#">City of Wooster, Site Development and Improvement Manual</a> Section 8: Post-Construction Section 9: Operation and Maintenance of Stormwater Controls Section 10: Protection of Watercourses and Wetlands Section 13: Inspection, Enforcement Action, and Penalties <a href="#">Ohio Rainwater and Land Development Manual</a>			

<b>MCM5(b): Post-Construction Requirements (EPA Specified)</b>			
<b>Description of SMP:</b> Effective July 1, 2017, the City implemented multiple post-construction requirements for new permanent stormwater controls constructed as part of development projects per the Ohio EPA General Construction Stormwater permit and Ohio EPA MS4 permit requirements. This program is being evaluated to include permanent stormwater controls constructed before July 1, 2017, as the City establishes a program meeting Ohio EPA requirements.			
<b>Mechanism</b>	<b>Responsible Party</b>	<b>Theme/Message</b>	<b>TMDL</b>
O&M Plans, Certifications, Agreements, Easements, Guarantees	The City of Wooster, Engineering Division	Long-Term Maintenance and Inspection	n/a
<b>Implementation Schedule</b>	<b>Completed</b>	<b>Measurable Goal</b>	<b>Frequency</b>
<b>Stormwater Control O&amp;M (Operations and Maintenance) Plan</b> must be provided during the development permitting process or before closing.	Yes	Number issued	Ongoing
<b>Engineering Certification and Owner Acknowledgment</b> must be issued by the design engineer upon completion of each new development project certifying that the permanent controls were constructed per design and that the O&M plan has been provided to the owner.	Yes	Number issued	Ongoing
<b>Inspection and Maintenance Agreements</b> shall be recorded between the City and the owner upon completion of new development projects.	Yes	Number issued	Ongoing

<b>Platted or Recorded Stormwater Easement</b> shall be provided for new development projects with permanent stormwater controls.	Yes	Number issued	Ongoing
<b>Financial Stormwater Guarantee</b> to be provided to the City before issuing a development permit and released upon closing the project.	Yes	Number of new/active/released	Ongoing
<p><b>The rationale for SMP:</b> The Ohio EPA General Construction Stormwater permit and Ohio EPA MS4 permit have specific requirements regarding post-construction inspection and maintenance of permanent stormwater controls. For controls installed or modified after July 1, 2017, the owner shall provide a stormwater control operation and maintenance plan; engineering certification and owner acknowledgment; an inspection and maintenance agreement between the City and owner; and shall include platted and recorded stormwater easements meeting City requirements.</p> <p><b>Target Audience:</b> Developers, Design Firms, Owners</p>			

<b>MCM5(c): Site Plan Review Procedures (EPA Specified)</b>			
<p><b>Description of SMP:</b> The City shall complete a plan review for all new development permits issued by the City of Wooster Engineering division. The review shall meet the Ohio EPA permitting requirements and City stormwater regulations for evaluating an SWP3, incorporating consideration of potential water quality and downstream impacts regarding post-construction stormwater management. The stormwater design engineer shall select structural and non-structural controls following standard practices outlined in the <i>Ohio Rainwater and Land Development</i> and <i>City Site Development and Improvement</i> manuals.</p>			
<b>Mechanism</b>	<b>Responsible Party</b>	<b>Measurable Goal</b>	<b>TMDL</b>
Plan Review and Approval	The City of Wooster, Engineering Division	Number/percentage of Projects Reviewed per year	n/a
<b>Implementation Schedule</b>	<b>Completed</b>	<b>Theme/Message</b>	<b>Frequency</b>
2021-2026 (ongoing)	Yes	Post-Construction Review	As Requested
<p><b>The rationale for SMP:</b> The City of Wooster Engineering Division must review all development and commercial plans to ensure compliance with the current Ohio EPA General Construction Stormwater Permit and the City Small MS4 Permit requirements. Plans shall be reviewed as part of the City Development Permit process and following the City of Wooster <i>Site Development and Improvement Manual</i>. An approved Ohio EPA checklist shall be utilized to ensure compliance and consistency.</p> <p><a href="#">City of Wooster, Site Development and Improvement Manual</a></p> <ul style="list-style-type: none"> <li>Section 8: Post-Construction</li> <li>Section 9: Operation and Maintenance of Stormwater Controls</li> <li>Section 10: Protection of Watercourses and Wetlands</li> <li>Section 13: Inspection, Enforcement Action, and Penalties</li> </ul> <p><a href="#">Ohio Rainwater and Land Development Manual</a></p> <p><b>Target Audience:</b> Builders, Developers, Contractors, Design Firms, Owners</p>			



**MCM5(d): Post-Construction Site Inspection Procedures (EPA Specified)**

**Description of SMP:** Per Ohio EPA mandate, the City is responsible for ensuring all owners or responsible parties of permanent stormwater controls within the MS4 are performing annual inspections and regular maintenance for each control. Controls permitted after July 2017 must meet all these requirements; however, the City is working on identifying and determining responsible parties for controls constructed before 2017. Programs shall be expanded and modified to meet Ohio EPA requirements throughout the current MS4 permit term.

<b>Mechanism</b>	<b>Responsible Party</b>	<b>Theme/Message</b>	<b>TMDL</b>
Inventory, Notification, Inspection, Reporting, Maintenance, and Repair	The City of Wooster, Engineering Division	Long-Term Inspection and Maintainance	n/a
<b>Implementation Schedule</b>	<b>Completed</b>	<b>Measurable Goal</b>	<b>Frequency</b>
Permanent SWC inventory: 2021-2026 Initial cursory City Inspections Public GIS web Map for SMCs: 2023 Identify control type: 2022/2023 Identify ownership/responsible party: 2022/2023 Collect historical information: (Ongoing)	Yes Yes In Process In Process In Process	Maintain Inventory	Ongoing
Notification of Responsibility: 2021-2026 All existing SMC Owners shall be notified of inspection and maintenance responsibilities. Notices shall be staged over the current permit term. Notification Letter to HOA/POAs and Private residential developments: 2023 (Spring). Notification Letters for Commercial facilities in lots of approximately 30-50 every 1-2 months 2023/2024.	No  In Process  No	Percentage Notified	Implementing
Annual Inspection and Maintenance Program: 2022-2026 BMP Inventory and Historical Data: Complete preliminary BMP inventory: 2022/23 Coordinate initial inspection of public residential and municipal permanent controls: 2023 (Spring)	Yes Yes In Process	Inspections reported	Implementing
Post Implementation: 2022-2026 Reminder Letter: October (each year) to enrolled participants Annual Self-Inspection and Maintainance Logs: Due by December 31 each year for the prior year Professional Inspection: First inspection due by December 31, 2028, then every 5 years from the prior inspection date.	No No No	Number letters sent Inspections reported Inspections reported	Implementing Implementing Implementing
<p>The <b>rationale for SMP:</b> The City has over 400 commercial, private, and public residential permanent stormwater controls. Most of these controls were constructed before the City became an MS4 in 2004 and ranged from good to failed based on the City’s initial cursory inventory. Per Ohio EPA mandates, the City must ensure the owners or responsible parties of all permanent stormwater controls/systems perform annual inspections and regular maintenance. The City is implementing this program over the entire permit term based on the number of controls and parties needing contacted.</p> <p><b>Target Audience:</b> Residential and Commercial SMC owners, including HOAs</p>			

**MCM5(e): Enforcement Procedures (EPA Specified)**

**Description of SMP:** To enforce post-construction EPA requirements, the City has incorporated additional language into the City *Site Development and Improvement Manual* - Section 13 Inspection, Enforcement Action, and Penalties to cover applicable enforcement and escalation policies for post-construction practices.

Mechanism	Responsible Party	Theme/Message	TMDL
Ordinance or Other Regulatory Mechanism	The City of Wooster, Engineering Division	Stormwater Regulation	n/a
Implementation Schedule	Completed	Measurable Goal	Frequency
2021-2026 (In development)	Yes	Ordinance or Other Regulatory Mechanism	Annually

**The rationale for SMP:** Per the Ohio EPA Mandate, the City must ensure that owners or the responsible party of permanent stormwater controls and systems are performing regular inspections, maintenance, and repairs. The City's *Site Development and Improvement Manual* - Section 13 Inspection, Enforcement Action, and Penalties

**Target Audience:** Permanent SCM Owners and Responsible Parties

**MCM5(f): Long-Term O&M Plans/Agreements (EPA Specified)**

**Description of SMP:** All Ohio EPA General Construction stormwater permits have required the owner to be provided with a long-term O&M Plan before terminating the EPA construction permit. Furthermore, the Ohio EPA construction permit also required agreements to be provided. In July 2017, the City of Wooster began requiring a copy of the O&M plan to be provided to the City as part of the development permit process. A maintenance agreement is also required between the BMP owner and the City for all developments constructed after July 2017 before releasing a financial stormwater guarantee against the development.

Mechanism	Responsible Party	Measurable Goal	TMDL
O&M Plans and Agreements	The City of Wooster, Engineering Division	Number of Agreements	n/a
Implementation Schedule	Completed	Theme/Message	Frequency
2021-2026	Yes	Long-term O&M	Ongoing

**The rationale for SMP:** Per the Ohio EPA General Construction Stormwater Permit, O&M plans must be provided to the owner or responsible party before terminating the Notice of Intent with the Ohio EPA. The City is subsequently required to confirm that the responsible party is performing the required inspections, maintenance, and repairs and, if necessary implement corrective actions.

**Target Audience:** Permanent SCM Owners and Responsible Parties

**MCM5(g): Protection of Watercourses and Wetlands (EPA Specified)**

**Description of SMP:** The City has adopted the Ohio EPA recommended guidance for protecting watercourses and wetlands. Beginning in 2017, the City requires all new developments to include provisions for the long-term inspection and protection of riparian buffers and wetland setbacks as established in the *City Site Development and Improvement Manual*, Section Ten: Protection of Watercourses and Wetlands. Areas developed before 2017 are still subject to current EPA requirements; however, the areas are grandfathered under the prior City and EPA requirements. No further development shall be permitted, and existing development shall be maintained with no further improvements.

Mechanism	Responsible Party	Measurable Goal	TMDL
Public Awareness, protected areas, and inspection and maintenance of buffer areas	The City of Wooster, Engineering Division	Number of areas protected	n/a
Implementation Schedule	% Target Audience	Theme/Message	Frequency
2021-2026 (ongoing)	Areas adjoining riparian and wetlands	Preservation of riparian areas and wetlands	All New Development
2023 – Public Awareness Program	Areas adjacent to riparian and wetlands constructed before 2017	A flyer explaining riparian and wetland areas	Existing Developments

**The rationale for SMP:** Protecting the riparian areas adjoining streams and areas surrounding wetlands is critical to preserving natural processes that support water quality to occur freely. These processes slow water runoff to protect downstream areas, maintain essential ecosystems within the buffer area, improve natural water quality, and substantially help reduce erosion and sedimentation. The City has begun to observe downstream impacts as upstream riparian and wetland areas are impacted by encroaching development. Protecting the remaining areas is crucial to minimize these impacts and hopefully begin to restore some areas in the future.

**Target Audience:** All – Citywide

**MCM5(h): Municipal and Public Residential Stormwater Control Inspection Program**

**Description of SMP:** The City shall provide initial inspection services to assist qualifying residential permanent stormwater control owners and HOAs in ensuring compliance with Ohio EPA inspection requirements. The initial implementation of this program shall include a cursory inspection of all municipal and public residential permanent stormwater controls to ascertain their overall condition and required maintenance. The initial inspections shall include public controls managed by HOA/POAs; however, any needed maintenance, repairs, and future inspections shall be the responsibility of the HOA/POA per City Zoning and Planning Ordinances. Private developments, apartments, and commercial facilities are not eligible to participate.

Mechanism	Responsible Party	Measurable Goal	TMDL
Inspection Program	The City of Wooster, Engineering Division	Number of Inspections and residents benefiting	n/a
Implementation Schedule	% Target Audience	Theme/Message	Frequency
2022-2026 (in development) 2022 – Implement program 2023 – First inspections and summary of findings. 2024-2026 – continued program development focusing on unmanaged controls and implementing needed inspection, maintenance, and repair.	100% eligible residential stormwater control owners	Inspection and Maintenance	TBD

**The rationale for SMP:** The City has about 40 residential permanent stormwater controls constructed between 1990 and today. With the current Ohio EPA MS4 permit now mandating the City ensure these controls are inspected annually by the owners or responsible party, the City is developing a residential inspection program to assist the owners and HOAs of public developments in completing the initial inspection requirements. Once the initial inspections are completed, an

overall score shall be assigned to each control. The City shall develop a maintenance plan based upon the findings for municipal and unmanaged controls and convey the findings to HOA/POAs or the responsible parties for managed controls.

**Target Audience:** Residential developments, HOAs

## MCM6: POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

The City of Wooster has developed and maintains a pollution prevention and good housekeeping plan for our municipal operations. The plan is intended to meet the Ohio EPA MS4 permit requirement to *“develop and implement an O&M program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations.”* The plan covers the PPM facilities located at 1151 Mechanicsburg Road, citywide operations for MS4 maintenance, including ditch maintenance, street-sweeping operations, stormwater system debris removal and related disposal of debris, road salt application, pesticide & herbicide usage, and fertilizer usage.

The City has numerous stormwater-related programs. The staff maintenance schedule includes cleaning catch basins, removing debris in swales, ditches, and culverts, and responding to emergency calls. The City currently sweeps all streets within the City a minimum of once yearly. In addition, downtown streets are swept on a biweekly basis during the period from May through October. Ditches, swales, and catch basins are cleaned when time permits or if a complaint is called into the City. Municipal detention/retention basins are checked during regular rounds and mowed under a service contract.

The City provides snow removal for the entire municipality utilizing salt and brine applications. The City currently owns multiple salt trucks for road maintenance during snow conditions. Salt and grit for roadway applications are stored at the City’s maintenance facility under a covered storage area. The City conducts vehicle and large truck/equipment maintenance at this facility. The maintenance facility has an interceptor on the floor drains to collect pollutants before discharge to the sanitary sewer system. The maintenance area also includes a tank for used oil collection and several 55-gallon plastic containers for recycling and disposal of cans, used rags, etc.

The City uses minimal herbicides and pesticides to minimize environmental impacts. Licensed City applicators or contractors apply all herbicides and pesticides. Typically the City does not utilize the application of fertilizers except where required for establishing new vegetative growth on City construction projects and only when necessary. PPM maintains logs of all applications throughout the calendar year as part of its reporting process.

PPM also has implemented a training program for all personnel composed of annual training or a series of short topic-related sessions throughout the year. The training includes spill prevention and management topics, appropriate stormwater control implementation, minimizing exposure of salt and debris material, IDDE and reporting, concrete materials and disposal, waste disposal, etc. Training/review is also provided for personnel that performs monthly SWP3 inspections of the PPM facility.

The current City of Wooster Service Center Stormwater Pollution Prevention Plan (SWPPP) was prepared by EMH&T in September 2013 and is slated to be reviewed and updated in 2024. A copy of the current plan and logs are maintained at the City of Wooster PPM facility.

**MCM6(a): Housekeeping BMPs (EPA Specified)****Description of SMP:** City of Wooster Service Center SWP3

Implementation Schedule	Responsible Party	Theme/Message	TMDL
2021-2026 (ongoing)	The City of Wooster, Public Properties and Maintenance	Municipal Stormwater Management	n/a
Mechanism	Completed	Measurable Goal	Frequency
Municipal Facilities	Yes	Number of Inspections	Monthly
MS4 Maintenance	Yes	Maintainance Activities and Schedules	Ongoing
Disposal of Wastes	Yes	Amount/Type of Materials	Ongoing
Road Salt	Yes	Tons/Gals Used	Ongoing
Pesticide & Herbicide Usage	Yes	Gallons Used	Ongoing
Fertilizer Usage	Yes	Pounds Used	Ongoing
Street Sweeping	Yes	Man Hours/Tons Disposed	Ongoing

**The rationale for SMP:** The City of Wooster has developed and maintains a pollution prevention and good housekeeping plan for our municipal operations. The plan is intended to meet the Ohio EPA MS4 permit requirement to “develop and implement an O&M program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations.”

**Target Audience:** City Employees

**MCM6(b): Employee Training (EPA Specified)****Description of SMP:** Employee Training Program

Mechanism	Responsible Party	Measurable Goal	TMDL
Employee Training	The City of Wooster, Engineering Division & PPM Facilities Managers	Minimum annual training or number of training modules per year	n/a
Implementation Schedule	Target Audience	Themes/Messages	Frequency
2021-2026 (ongoing)	City Employees	Spill Prevention/Manage MS4 Maintenance Road Salt Application Disposal of Waste Pesticide & Herbicides IDDE Awareness Ditch Maintenance Stormwater Management	Annually or periodic modules

**The rationale for SMP:** The City shall provide annual (or periodic module training) to PPM and other City employees that can directly impact the City MS4 program. The training shall be topic based in direct correlation to the current MS4 program implemented by the City.

Note: The City modified this program to use either annual training as a group or periodic media-based training modules to be provided throughout this year. The change was driven by COVID-19 and the need to maintain social distancing.

**Target Audience:** City Employees

## Revision Log:

- (1) 3/20/2021: The City training program was modified to include the option to utilize individual media-based training options presented periodically throughout a calendar year in place of annual in-person training. The modification was driven by the need to maintain social distancing and minimize exposure during COVID-19.
- (2) 4/1/2022: Static data in this plan is updated during April of each calendar year.
- (3) 4/1/2022: The date annual inspection reports and logs must be submitted changed from January 31 to December 31 each year to align with other City reporting requirements.
- (4) 4/5/2023: Static data in this plan is updated during April of each calendar year.