



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Re: Auglaize County
Village of Cridersville
Stormwater - MS4

June 30, 2011

Mr. John McDonald, Village Administrator
Village of Cridersville
110 West Main
Cridersville, Ohio 45806

Dear Mr. McDonald:

On May 25, 2011, I conducted an audit of the Village of Cridersville Municipal Separate Storm Sewer System (MS4) program which is authorized under the National Pollutant Discharge Elimination System (NPDES) permitting program for storm water discharges under US EPA's Phase II storm water regulation.

The audit consisted of an evaluation of the Storm Water Annual Report and an interview with you. The audit followed a modified worksheet issued by USEPA. Answers to questions in the worksheet are in bold italics. The Village of Cridersville is a small MS4 and many of the aspects of the program as outlined by USEPA guidance do not pertain to a village the size of Cridersville.

Cridersville has a population of approximately 1860, a staff of four to implement the stormwater program, and six outfalls in the municipal storm sewer system. There has been little in the way of construction sites within the Village's municipal limits.

The MS4 permit requires that a storm water management plan (SWMP) be developed, implemented and enforced in order to reduce the discharge of pollutants from the community in order to satisfy the appropriate water quality requirements of Ohio Revised Code (ORC) 6111, and the Clean Water Act. The SWMP includes best management practices (BMPs) along with measurable goals for each of the BMPs. Few of the goals given in the latest annual report provide a measurement of the effectiveness of the program.

The following is a summary of findings of each of the six minimum controls of the program:

1. **Public Education and Outreach on Storm Water Impacts** – education given to public through the Quarterly Courier, Consumer Confidence reports, and the village website. Village staff could look at USEPA handouts for new ideas.

The Village should track how many handouts are given or the number of hits on the website

2. Public involvement/Participation – Public participation is minimal in implementing the program. Public does participate in hazardous waste collections, community clean ups, and storm drain stenciling. The Village personnel should compare volume of collections with education efforts which could include a survey of participants.
3. Illicit Discharge Detection and Elimination –Village personnel inspects outfalls yearly but need to document inspections, training of employees, and education of public about illicit discharges. Illicit discharges are not confined to home sewage treatment systems but to any discharge that would cause pollutants to enter waters of the state and does not have an NPDES permit.
4. Construction Site Storm Water Runoff Control – The Village has few construction sites within Village limits. The Village personnel should put a protocol together to document who does plan review and when and any deficiencies noted; come up with a checklist for monthly inspections of construction sites, and document who and when sites are inspected. The Village should also have enforcement protocol in place. Village staff needs to update notes that are used for construction sites. Straw bales are not acceptable and a sediment and erosion control.
5. Post-Construction Storm Water Management in New Development and Redevelopment – The Village should put a protocol together to document who does plan review and when and any deficiencies noted; come up with a checklist for inspections of post construction BMPs, and document who and when sites are inspected. The Village should also have enforcement protocols in place.
6. Pollution Prevention/Good Housekeeping for Municipal Operations – The Village cleans storm sewer and catch basins yearly and sweeps streets twice a month in the summer. Street sweepings are taken to a landfill. Road salt is kept in a covered building and spillage is swept. The Village minimizes use of fertilizers, herbicides, pesticides and road salt as appropriate.

A major way that the Village can improve their MS4 program is to have procedures in writing and follow up any inspections with written reports.

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If you have any questions, you may contact me at 419-373-3016 or by e-mail at patricia.tebbe@epa.state.oh.us .

Sincerely,



Patricia A. Tebbe, P.E.
Division of Surface Water

/llr

Enclosure

cc: ~~DSW=NWDO~~

ec: Jason Fyffe, DSW-CO, w/enclosure

PROGRAM EVALUATION WORKSHEETS

Village of Cridersville

MS4 Inspection

5/25/11

For Village of Cridersville:

John McDonald

OEPA:

Patricia A. Tebbe

1. Program Management Component

A. Comprehensive Stormwater Management Planning SWMP Planning

Interview Questions:

- SWMP Plan developed? *yes*
- Were stakeholders included in the planning process? *Yes but public participation was disappointing*

B. Comprehensive Stormwater Management Planning Intergovernmental, Agency, Departmental Coordination

Interview Questions:

- How are in-house departments coordinated? *Small village, Village Administrator coordinates*
- Is there a stormwater task force or committee in place? *Utility and Stormwater committee held two meetings in past year*
- Are outside groups used to implement the SWMP?
 - Name of group(s) *SWCD organized a float in parade last year; Recommend that Village contact Health Department and SWCD to see if they have any appropriate programs*

C. Comprehensive Stormwater Management Planning Staff Inventory & Organization

Interview Questions:

- Has an organizational chart been developed? *Yes but with a small village and few employees, Village Administrator is main contact*
- Have roles and responsibilities been assigned? *Generally, assigned by Village Administrator*

PROGRAM EVALUATION WORKSHEETS

D. Comprehensive Stormwater Management Planning Performance Standards or Goals

Interview Questions:

- Have measurable goals or standards been developed for each SWMP program component? *Not for all. While goals have been chosen, if there is no method of measuring them it is difficult to show how they address water quality impacts or effectiveness*

E. Comprehensive Stormwater Management Planning Prioritization of Resources

Interview Questions:

- Have pollutants of concern (POC) been established? *No*

F. Assessment and Evaluation

Interview Questions:

- Is the SWMP regularly measured against goals or standards? *No*
- Have load reduction goals been established or assessed? *No*
 - Have other types of improvements been assessed? *No*
 - Riparian habitat?
 - Stream corridor?
 - Aquatic habitat?
 - Groundwater?

G. Data Collection and Reporting

Interview Questions:

- Have internal reporting deadlines been established? *No, in a small village, data is available to all*

2. Public Education/Involvement Component

A. Goals and Objectives

Interview Questions:

- Outreach strategy document developed? *No small village of 1860*

PROGRAM EVALUATION WORKSHEETS

- Measurable goals included in the document? *Goals are included but generally not measurable. Need to provide a number such as a volume of a collection or number of handouts.*

B. Message Development

Interview Questions:

- Specific stormwater messages been developed? *Yes*
- Based on what?
 - Pollutants of concern ✓
 - Target audience ✓
 - Behavior of concern ✓
 - Other
- Illicit discharges being addressed? *Yes*
- Pesticides, herbicide, and fertilizer education being conducted? *No*

C. Target Audience

Interview Questions:

- Target audiences established? *residents*
- Based on what:
 - Behavior? ✓
 - Location/neighborhood? ✓
- Target audiences regularly reevaluated? *No*
- Homeowners a target for pesticide, herbicide, and fertilizer education?

Recommend that village begins an education for homeowners

D. Message Packaging

Interview Questions:

- Types of message "packaging": *quarterly newsletter with water conservation tips, pet waste ordinance, litter ordinance, consumer confidence report required by water regulations give pollution prevention tips, develop and utilize web site,*
- *recommend village look at USEPA handouts and try to utilize ideas*

E. Distribution Mechanisms

Interview Questions:

- Methods and location of materials distribution: *mailing; village website*
- Distribution tracked? *No*

PROGRAM EVALUATION WORKSHEETS

F. Public Involvement Activities

Interview Questions:

- Public participation obtained during stormwater management program changes? *No changes made, would be done during council meetings*
- Stormwater related volunteer activities sponsored or endorsed? *Scout catch basin stenciling (being redone, started with paint and replacing with medallions); lions club; garden club; village sponsored community cleanup (160 cu yds of refuse removed, 15 gallons of oil, and car batteries); recycle center*

G. Evaluation Methods

Interview Questions:

- Public Education and Involvement assessment methods: *count the number of users*
- Public awareness survey been performed? *no*

3. MS4 Maintenance Component

A. MS4 Mapping

Interview Questions:

- Outfalls and receiving waters mapped? *Completed but updated as more information comes in*
- Catch basins?
- Pipes, ditches, other conduits?
- Public stormwater facilities (BMPs)?
- Private stormwater facilities (BMPs)?
- How are maps used (i.e. tracking illicit discharges)?

B. Catch Basin Cleaning

Interview Questions:

- How are spoils materials disposed of? *Dumpster to landfill*
- Are storm drain pipes inspected? *Regularly inspected and cleaned along with catch basins once per year*

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C. Stormwater Management Facilities Operation and Maintenance

Interview Questions:

- Private facilities inspected? *Belmass garage, vehicle maintenance – no issues*

D. Road Maintenance

Interview Questions:

- Streets regularly swept? *yes*
 - Frequency: *In summer once/2 weeks*
- How are spoils disposed of? *landfill*
- BMPs used during road maintenance activities? Describe. *Vehicle maintenance program in place, change and capture oil*
- Deicers used by MS4? *Road salt*
- Sand/salt swept up after application? *Road salt kept under roof and spillage pushed back into building*

E. Flood Management

Interview Questions:

- Inventory of flood management structures completed?
- Structures been assessed for stormwater retrofit?
- New structures include water quality considerations?

F. Facilities Operation & Maintenance

Interview Questions:

- Inventory of MS4 facilities complete (i.e. facilities owned and operated by the MS4)?
- Types of facilities included: *Maintenance facility (located in Allen County), Tower Park, Town Pond, Municipal Parking Lot, Wastewater Treatment Plant*
- Facilities inspected?
 - Frequency:
- Checklist used?
- Staff which perform the inspections (department or agency): *Village Administrator*
- Facilities required to have stormwater pollution prevention plan (SWPPP)? *No*
- Is there a designated stormwater contact person for each facility? *Village Administrator*
- Parking lots owned/operated by the permittee swept? *Yes*

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G. Pesticides, Herbicides & Fertilizers

Interview Questions:

- Certified applicators used? *No*
- Storage location of pesticides, herbicides, and fertilizers: *Shop*
- BMPs used during application. *Improved landscaping to minimize weed growth, minimize use of herbicides and fertilizers and pesticides*

H. Staff Education and Training

Interview Questions:

- Staff trained to identify illicit discharges?
 - Frequency. *Annual training of staff*

4. Construction Component

A. Ordinance/Legal Authority *comprehensive plan establishing subdivision regulations with construction standards and design criteria developed*

Interview Questions:

- Ordinance used to require stormwater BMPs at construction sites?
 - Name and/or code section(s). *Found in Storm Drainage document*
- Threshold for coverage (e.g., 1 acre, 100 cubic yards, etc.) *1 acre*
- Exclusions from coverage allowed. *No*
- Other pollutants regulated on construction sites (e.g., construction wastes, trash, chemicals, etc.): *Ordinance 1499 for trash used*
- Permitting mechanism used to require appropriate BMPs (i.e. grading permit, building permit): *Zoning permit*
- Is a plan required (erosion control plan or SWPPP)? *Yes*
- Are minimum construction site BMPs specified? *Yes Note that straw bales are not acceptable to Ohio EPA*
 - What types? *Straw bales and silt fence, sed basins, check dams*
- Types of enforcement mechanisms available.
 - Notices of Violations *✓*
 - Administrative fines *✓*
 - Stop-work orders *✓*
 - Civil penalties *need to check for*
 - Criminal penalties *need to check for*

PROGRAM EVALUATION WORKSHEETS

B. Construction Project Inventory

Need to keep notes or records of inspections, inspections are required once/month, need new notes for construction projects – straw bales are not acceptable

- Number of active projects: *Two. Both of which have been notified to submit Notice of Termination to Ohio EPA*

C. Construction Requirements and BMPs

Interview Questions:

- Technical guidance provided or required? *Found in storm drainage document*
- Does guidance include selection criteria? *no*
- Does guidance include operation and maintenance requirements? *no*
- Does guidance have different requirements or standards for different times of the year (i.e. rainy vs. dry seasons)? *no*

D. Plan Review Procedures

Interview Questions:

- Who performs erosion and sediment control plan review (i.e. planning department, building department)? *Choice One helps with large projects*
- Training received and frequency: *staff trained on inspections*
- Size threshold for plan review: *1 acre*
- NOI submittal verified during review?
 - How (i.e. canceled permit fee check)?
- Pre-project meetings conducted with developer?
- Standard conditions of approval include erosion and sediment control and/or general stormwater requirements?
- Plan review criteria or checklist used? *yes*

E. Construction Project Inspections

Interview Questions:

- Who performs construction stormwater inspections: *Village Administrator and staff*
- Training received and frequency: *staff trained annually*
- How many inspectors for stormwater issues at construction projects?
- How often are sites inspected? *Monthly*
- Inspections triggered by rain events? *Sometimes*

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F. Enforcement/Referrals

Ordinances allow for enforcement.

Only verbal warnings have been given so far

Recommend that Village keep records on enforcement warnings

Interview Questions: Village needs to make sure that they are able

- Most common compliance issue on construction projects: *tracking on streets*
- Adequate legal authority and tools available to inspectors to enforce stormwater requirements on construction projects? *Village needs to make sure that they do have the tools available to enforce stormwater requirements*
 - If no, how could the program be improved?
- Who does follow up on enforcement actions?

G. Outreach and Education

Interview Questions:

- Type of training provided to construction operators: *None however there are few, if any, construction projects in the Village.*
- Attendance required?
- Training frequency?
- Number of operators trained:
- Training topics:
- Presentations given by MS4 staff to professional groups?
- Brochures or outreach materials targeted at operators:
- How/when is the information distributed?
- Website used to educate operators?
 - Web address:

H. MS4-Owned Construction Projects *None*

5. Post-Construction Component

A. Ordinance/Legal Authority

Interview Questions:

- Ordinance used to require post-construction stormwater BMPs on new development or redevelopment projects? *Ordinance developed*
- Threshold for coverage (e.g., 1 acre, 100 cubic yards, etc.)
- Exclusions from coverage allowed: *No*

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- Permitting mechanism used to require appropriate BMPs (i.e. building permit): *Subdivision regulations with construction standards and design/zoning ordinance*
- Is a plan required (erosion control plan or SWPPP)? *Yes*
- Are minimum post-construction site BMPs specified? *No*

B. Comprehensive or Master Planning *None developed*

Interview Questions:

- Is there an overall comprehensive or watershed plan with detailed information on current and planned development and redevelopment?
- If the permittee is a municipality, does the comprehensive plan include stormwater elements? If so, what types?
 - Imperviousness
 - Public infrastructure/drainage
 - Open space
 - Water body protection
- Are there programs and design guidelines to assist in current and future development and redevelopment (including funding programs)?
- Audit or review of existing codes completed?

C. Construction Requirements and BMPs

Interview Questions:

- Technical guidance provided or required? *No*

D. Plan Review Procedures

Interview Questions:

- Who performs post-construction BMP plan review (i.e. planning department, building department)? *Choice One*
- Size threshold for plan review: *1 acre*
- Pre-project meetings conducted with developer? *No*
- Standard conditions of approval include post-construction stormwater requirements?
- Plan review criteria or checklist used?
- Maintenance agreement required? *No*

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E. Post-Construction BMP Inventory

Interview Questions:

- Post-construction structural BMPs tracked? *Yes but only a couple in the Village*
- Information tracked:
 - Location
 - Maintenance Requirements
 - Inspection findings
 - Other:
- Nonstructural BMPs tracked? *No*
- Database used? *No*

F. Post-Construction BMP Inspection and Maintenance

Interview Questions:

- Who performs post-construction BMP inspections? *Village Administrator*
- How often are BMPs inspected? *yearly*

G. Enforcement/Referrals *None Made*

Interview Questions:

- Can inspectors administer enforcement actions if private post-construction BMPs are not maintained?
 - If no, who can?
 - If yes, what types of enforcement actions?
- Enforcement action is most commonly used:
- Enforcement actions tracked?
 - How?
- Average number of enforcement actions (by type) issued in the previous year:
 - Notices of Violations (NOV)
 - Administrative fines
 - Stop-work orders
 - Civil penalties
 - Criminal penalties
 - Other:
- Adequate legal authority and tools available to inspectors to enforce post-construction stormwater requirements?
 - If no, how could the program be improved?
- Who does follow up on enforcement actions?

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H. Outreach and Education *None Done*

Interview Questions:

- Type of training provided to designers and engineers:
- Attendance required?
- Training frequency?
- Number trained:
- Training topics:
- Presentations given by MS4 staff to professional groups?
- Brochures or outreach materials targeted at designers and engineers:
- How/when is the information distributed?
- Website used to educate designers and engineer?
 - Web address:

I. MS4-Owned Construction Projects *None Owned*

Interview Questions:

- Projects designed in-house or contracted?
- Designers trained in post-construction stormwater BMP implementation?
- Checklist used during the design and/or review of post-construction BMPs?
- If contracted planners and engineers are used for the design of MS4-owned projects, does the contract language specify that post-construction stormwater BMPs be incorporated into the design?
- In-house inspection staff inspect post-construction BMPs? If so, which department?
- Post-construction inspectors trained?
 - Frequency:
- If contracted inspectors are utilized, are minimum inspection, maintenance and reporting requirements specified in the contract?

J. Ordinance/Legal Authority

Interview Questions:

- Ordinance which requires industrial/commercial facilities to install BMPs or minimize pollutant discharge?
 - Name and/or code section(s).

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K. Enforcement *None needed*

Interview Questions:

- Enforcement escalation plan or procedures adopted?
- Can industrial/commercial inspectors administer enforcement actions?
 - If no, who can?
 - If yes, what types of enforcement actions?
- Enforcement action is most commonly used:
- Enforcement actions tracked?
 - How?
- Average number of enforcement actions (by type) issued in the previous year:
 - Notices of Violations (NOV)
 - Administrative fines
 - Civil penalties
 - Criminal penalties
 - Damage abatement
 - Other:
- Adequate legal authority and tools available to inspectors to enforce stormwater requirements at industrial/commercial facilities?
 - If no, how could the program be improved?
- Who does follow up on enforcement actions?

Applicable Documents:

- Enforcement escalation plan or procedures

6. Illicit Discharge Component

A. Ordinance/Legal Authority

Interview Questions:

- Ordinance which prohibits illicit discharges? *Yes*
- Exclusions (non-stormwater discharges) allowed: *No*
- Types of enforcement mechanisms available:
 - Notices of Violations (NOV)
 - Administrative fines
 - Stop-work orders
 - Civil penalties
 - Criminal penalties
 - Other:
- Official enforcement escalation plan or procedures in place?

PROGRAM EVALUATION WORKSHEETS

B. Dry-Weather Screening

Interview Questions:

- Map of MS4 system complete? *Yes 6 outfalls*
- Who can access the map and for what purpose? *Access through Village Offices*
- Dry-weather field screening used to detect illicit discharges? *Yes*
- Frequency and extent of field screening: *Screen twice per year*
- Checklist or reporting form utilized? *No*
- Dry-weather flows sampled and analyzed? *No*
- Dry-weather screening findings tracked? *If found*

C. Investigation of Illicit Discharges

Interview Questions:

- Investigation procedure adopted? *Sampling*
- Summary of process used: *No HSTS in village, all new construction must tap into sewer, 6 outfalls checked yearly, complaints for residents investigated*
- Staff (departments/agencies) utilized: *Village staff*
- Enforcement mechanisms available:
 - Notices of Violations (NOV)
 - Administrative fines
 - Civil penalties
 - Criminal penalties
 - Abatement charges for damage
 - Other:

D. Public Awareness & Reporting

Interview Questions:

- Spill reporting hotline? *911*
- Complaint tracking database or system? *Few received, paper notes kept*
- Outreach materials used to educate public about illicit discharges: *Utilize consumer confidence report, website, and quarterly Courier to distribute tips*

E. Spill Prevention & Response

Interview Questions:

- Spill response plan or procedures adopted?
 - Who responds? *Fire Department*
- Adequate equipment and training for staff?
- Tracking of spills and response?
 - Database used?

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F. Used Oil & Toxics Management

Interview Questions:

- Types of waste managed:
 - Household Hazardous Waste - *County Hazardous Waste Day*
 - Used oil ✓
 - Batteries ✓
 - Thermometers ✓
 - White goods (e.g. refrigerators) *During haul week*
 - E-waste (e.g. computers) ✓
 - Paint ✓ *dried*
 - Other **building materials, tires, people haul yard waste to county compost facility**
- Describe public outreach materials used:

G. Sanitary Sewer Discharges

Interview Questions:

- Sanitary sewer systems evaluated to determine storm sewer cross-connections or overflow locations? *None known or observed, complaints*
- Extent of infiltration and inflow into storm sewer system: *No*
- Sewer spill and cleanup procedures in place?

H. Staff Education and Training

Interview Questions:

- Staff trained to identify illicit discharges? *Yes*
 - Frequency: *Yearly*