



3GQ1000120091201

CUYAHOGA NORTH OLMSTED CITY OF NORTH OLSTED 3GQ10001 2009/12/01 BOGOEVSKI,
DANIEL

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State of Ohio Environmental Protection Agency

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

November 30, 2009

RE: CUYAHOGA COUNTY
ROCKY RIVER WATERSHED
CITY OF NORTH OLMSTED
FINDINGS OF MUNICIPAL STORM
WATER PROGRAM INSPECTION

Mr. Duane Limpert, Service Director
City of North Olmsted
5200 Dover Center Rd.
North Olmsted, OH 44070

Dear Mr. Limpert:

Ohio EPA has completed an audit for a portion of your municipal storm water program. Our audit primarily focused on implementation of minimum control measure (MCM) #6: Pollution Prevention and Good Housekeeping for Municipal Operations. This program is a requirement of the Ohio EPA General Storm Water National Pollutant Discharge Elimination System (NPDES) Permit for Small Municipal Separate Storm Sewers Systems (MS4s) OHQ10001*BG and Ohio Administrative Code 3745-39.

On August 12, 2009, Ohio EPA met with you and other representatives of the City of North Olmsted to determine compliance with the NPDES permit and the Storm Water Management Plan (SWMP) submitted by the City in March 2003. In performing this audit, Ohio EPA implemented the Municipal Storm Water Program Evaluation Guide developed by the United States Environmental Protection Agency.

Attached are the Municipal Storm Water Program Evaluation and Field Inspection worksheets completed for your community. Please review these documents in detail to determine specific elements where your pollution prevention and good housekeeping program requires improvement. In addition, you will find comments suggesting ways to improve your MS4 program. The following is a summary of our audit findings:

Violations

- **Failure to obtain NPDES permit coverage for storm water discharges associated with industrial activity from the wastewater treatment plant.** This is a violation of Ohio Revised Code 6111.04 and Ohio Administrative Code 3745-38-09. Although the City had submitted a No Exposure Certification to Ohio EPA for the wastewater treatment plant, our inspection revealed that the facility does not qualify for no exposure exemption. Please submit Form 2F of the individual NPDES permit application so that we can add storm water language to the NPDES permit for wastewater discharges from the plant. Further, a Storm Water Pollution Prevention Plan (SWP3) will need to be developed and implemented for this facility.
- **Failure to implement procedures for the proper disposal of waste removed from the MS4.** This is a violation of Part III.B.6.d.iii.3 of the NPDES permit and ORC 6111.04 and 6111.07. Our inspection of the North Olmsted Wastewater Treatment Plant revealed that catch basin cleanings and street sweepings were not being managed per the City's stated protocol. Although dumpsters had been provided to store solids after

dewatering, we found two stockpiles of catch basin cleanings on the pavement next to the dumpsters. Thus, employees are not implementing the procedures established to properly dispose of waste removed from catch basins and streets.

- **Failure to implement a regular employee training program.** This is a violation of Part III.B.6.e of the NPDES permit. Although the City could demonstrate that at least one training session had been provided during the first MS4 permit term (2003-2008), you indicated that there is no regular employee training program and no specific informational brochures or training materials have been provided for road crews, maintenance staff or contracted staff. During our interview, you could not identify any best management practices (BMPs) that are implemented when conducting road maintenance. Be aware that the current MS4 permit requires the City to provide at least one employee training session per year (2009-2014).

Deficiencies

- Although the Service Director has oversight over all municipal operations, a storm water contact has not been designated for each facility. In particular, storm water contacts must be designated for the Maintenance Facility, Wastewater Treatment Plant (WWTP) and Bradley Road Compost Yard. Please be aware that Part IV.C.1 of the NPDES permit requires that a Table of Organization naming points of contact be submitted with your annual report, starting with the report due April 1, 2010.
- The City has not developed Storm Water Pollution Prevention Plans (SWP3s) for the Maintenance Facility or WWTP. Plans for these facilities must be developed and implemented no later than June 3, 2011. **NOTE:** Please check the NPDES permit for the WWTP once it is reissued. It may specify an earlier date.
- The City has not developed checklists to inspect the Maintenance Facility, Compost Yard or WWTP. We strongly recommend the creation of storm water inspection checklists for these facilities to standardize inspections and remind inspectors of the critical areas that must be reviewed during an inspection. Checklists should be included in the SWP3s for facilities that require one.
- The City must repair the roof of the salt storage dome and improve good housekeeping around it. Although the City indicated that salt is swept back into the dome after larger storm events, we observed salt outside the dome around the door in August, four months after the last snowfall.
- The City must repair the breach in the berm of the leachate collection pond at the Bradley Road Compost Facility and develop a plan to manage levels of leachate in the pond so as to assure no discharge. The MS4 permit does not authorize the discharge of leachate from this facility.
- The City has not developed contract language to require storm water BMP implementation when a third-party provides municipal operations on behalf of the City. Contract language must be added to all contracts with such parties, e.g., operators that provide vehicle impound services. Further, we recommend periodic inspection of their operations to assure that they are implementing BMPs.

Mr. Duane Limpert
City of North Olmsted
November 30, 2009
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- The City did not have copies of the maps of MS4 outfalls available during our inspection. As such, Ohio EPA could not verify compliance with this requirement. Please submit a copy of the map(s) with your response to this audit. Electronic copies in pdf format on disc are acceptable.
- The City does not appear to have a well-defined plan to address illicit discharges to the MS4. The City contracts with the Cuyahoga County Board of Health (CCBH) to help identify illicit discharge sources, but what actions does the City take to follow-up on those reports? What steps does the City take to eliminate illicit discharges? Who is responsible for taking those actions? Is there a plan with timeframes, in writing, to address sources that cannot be eliminated immediately? Please identify the actions taken by the City to address the illicit discharge sources in CCBH's report for 2008.
- The City has not developed an inventory of private post-construction BMPs installed since April 21, 2003, and all publicly-owned post-construction BMPs. Please be aware that this is required by the MS4 permit and must be completed by June 3, 2014. Be sure that you establish a system to add new post-construction BMPs to that inventory as new development and redevelopment occur.
- The City has not developed standards and procedures for maintenance of post-construction BMPs. A checklist to conduct inspections has not been developed and there was no documentation to demonstrate that facilities had been inspected and maintained.

Please review my comments and provide me with a letter of response indicating the actions you will take to address my concerns. **Your response should be received no later than January 4, 2010.** Please note that this response does not replace the requirement to submit an Annual Report. Your annual report for 2009 will be due on April 1, 2010.

If you have any questions, please contact me at (330) 963-1145 or via e-mail at dan.bogoevski@epa.ohio.gov.

Sincerely,



Dan Bogoevski
District Engineer
Division of Surface Water

DB/mt

cc: Thomas O'Grady, Mayor, City of North Olmsted
Sharon Schlemmer, Superintendent North Olmsted WWTP
Laura Travers, Cuyahoga County Board of Health
Dan Collins, Bowen & Associates

Municipal Storm Water Program Evaluation

MS4 Maintenance Component Worksheet

Instructions: Use this worksheet as a guide for questioning MS4 staff and reviewing applicable documents. Keep in mind that additional questions may be necessary based on local regulations, MS4 permit requirements, implementation strategies, or water quality issues. Remember to obtain copies of any applicable documents or files which may assist in writing the MS4 evaluation report.

Date of Evaluation	August 12, 2009
Evaluator Name, Title	Dan Begoevski, D&W-NEDO Storm Water Program Coordinator
MS4 Permittee	City of North Olmsted

Staff Interviewed		
Name	Department/Agency	Phone Number/Email
Duane Limpert Service Director	Service Department City of North Olmsted	(440) 716-4150 limpertd@north-olmsted.com
Scott Wangler Annual Report Author	Richard Bowen & Associates	(440) 716-4117
Dan Collins Asst City Engineer	Richard Bowen & Associates	(440) 716-4117 dcollins@rlba.com
Al Herman, Road Foreman Tim Conway, Fleet Manager Dave Wendell, Foreman	Service Department City of North Olmsted	(440) 716-4150

MS4 Mapping		
Interview Questions	Response	
Outfalls and receiving waters mapped?	YES	
Catch basins?	NO	
Pipes, ditches, other conduits?	NO	
Public stormwater facilities (BMPs)?	NO	
Private stormwater facilities (BMPs)?	NO	
How are maps used (i.e. tracking illicit discharges)?	The City has contracted with CCBH to assist with illicit discharge investigations. CCBH provides reports each year identifying outfalls where there are possible illicit discharges.	
Applicable Documents	Reviewed	Obtained
Map(s) of MS4 system	NO	NO

Notes

Map of MS4 Outfalls

The City has not created a single map of the MS4 identifying the location of outfalls and the names of receiving streams. Rather, the City states that the information is available in various pdf files created by scanning in paper copies of existing maps. A copy of these files was not shared with Ohio EPA, as such, the agency cannot verify that a map of MS4 outfalls has been completed. Information submitted with past annual reports indicates that the Cuyahoga County Board of Health (CCBH) has created a map of outfalls for the City. So, a map of outfalls may indeed exist.

Failure to complete a map of the MS4 system identifying outfalls and the names of the receiving streams is a violation of Part 3.2.3.1.2 of the NPDES permit for small MS4s #OHQ000001. This map was required to be completed no later than March 19, 2008. If this map exists, please provide me with a copy. If the map does not exist, the City of North Olmsted will remain in violation of the NPDES permit until a map of MS4 outfalls is received. **A copy of the map is to be submitted with your response to this audit report.**

Further, please note that the map must be expanded to meet the obligations of #OHQ000002. The permit in effect from 2009-2014 requires that all catch basins and publicly-owned storm sewers, ditches and storm water management facilities (including publicly-owned post-construction BMPs) be mapped. In addition, the map must show privately-owned storm water management facilities constructed as post-construction BMPs for new development or redevelopment which has occurred since April 21, 2003. This must be completed by the expiration of your current NPDES permit coverage, i.e., June 3, 2014.

The agency recommends that the City produce at least one, comprehensive map of the MS4 system that can be posted on the wall of the engineering and/or service department to reference during illicit discharge investigations and to raise awareness of the system amongst city employees. Further, as the MS4 program matures and grows in scope, it would be prudent to computerize the MS4 system map rather than rely on pdf copies of hand-marked plan sheets.

Illicit Discharge Investigation & Elimination

CCBH performs dry weather screening of a certain number of outfalls each year and provides the City with a report identifying outfalls with apparent illicit discharges. Please provide me with a copy of the latest report from the CCBH identifying outfalls with possible illicit discharges. **Please identify the steps the City of North Olmsted has taken to identify the specific sources of those discharges and the steps taken to eliminate them. If any of these sources have not yet been eliminated, please provide me with a specific plan (including timeframes) to eliminate the sources.** Information contained in past annual reports indicates that Bowen & Associates (as the City Engineer) receives the reports from CCBH and is tasked with documenting the number of illicit discharges detected and the corrective measures taken.

Because the City uses the Cuyahoga County Board of Health and Bowen & Associates as third party service providers to implement the Illicit Discharge Detection & Elimination (IDDE) program, a signed Memorandum of Understanding (MOU) is required with each of these organizations. The MOU is to clearly identify the duties and responsibilities of each party in implementing the IDDE program on behalf of the City. However, be aware that certain enforcement actions required to eliminate illicit discharges may fall outside the authority of CCBH and/or Bowen & Associates. These will remain the responsibility of the City. Your IDDE plan should clearly identify what actions the City and third party service providers must take and when those actions will be taken.

Catch Basin Cleaning			
Interview Question	Response		
Schedule established for inspections and cleaning?	YES		
Is cleaning and maintenance of catch basins tracked:	YES		
How are spoils materials disposed of?	<p>Spoils are taken to WWTP where the liquids and solids are separated. Once dewatered, the solids are placed in a dumpster and taken to a landfill. The liquids are directed to sanitary sewers.</p> <p>Our inspection of the WWTP revealed that catch basin cleanings were not placed in the dumpster as required and it was unclear if liquids drained to a sanitary connection. This is a deficiency in the implementation of your program and must be corrected.</p> <p>See Facility Inspection Worksheet for the Wastewater Treatment Plant for more information.</p>		
Are storm drain pipes inspected?	YES		
Proactive or only in response to blockage event?	Storm drain pipes are partially inspected as part of catch basin cleaning program, however, the system overall is not inspected proactively. But, the City does respond to a blockage event.		
Applicable Documents		Reviewed	Obtained
List of active municipal construction projects		YES	YES
List of municipal projects covered under the Ohio EPA general storm water NPDES permit for construction activities		YES	YES

Notes
<p>Catch Basin Cleaning</p> <p>The City started the catch basin cleaning program in 2008. They have divided the City up into 4 wards and have only inspected catch basins in Ward 1 to date. The intent is to inspect and rehab catch basins one ward at a time. The inspections are conducted by the City Engineer and information is given to the Service Director.</p> <p>Be sure that City employees are trained on how to manage street sweepings and catch basin cleanings. Also, be sure to inspect management areas regularly to assure that the proper procedures are being followed. Our inspection of the WWTP revealed that catch basin cleanings and street sweepings were <u>not</u> being stored in covered dumpsters as indicated during this interview.</p> <p>Municipal Construction Projects</p> <p>An inspector from the Engineering Dept inspects municipal construction projects once a week, when applicable (projects that disturb 1 or more acre of land or are part of a larger common plan of development or sale where 1 or more acre will be disturbed). The inspector uses the Ohio EPA construction site inspection checklist to do storm water inspections.</p>

The City does maintain a list of current municipal construction projects. However, the current list is comprised of road projects that Ohio EPA categorizes as "routine maintenance" and are not subject to NPDES permitting through the Ohio EPA General Storm Water NPDES Permit for Construction Activities #OHC000003 (see www.epa.ohio.gov/dsw/storm/routine_maint.aspx for an explanation). The City was reminded of its obligation to obtain NPDES permit coverage for all municipal construction projects not exempted from NPDES permitting. Ohio EPA expects the City to use the same standards when reviewing the storm water pollution prevention plan (SWP3) for municipal construction projects as it does when reviewing the SWP3 for private development.

Stormwater Management Facilities Operation and Maintenance			
Interview Questions		Response	
Public facilities inspected?		YES	
Frequency:		As needed, 3-4 times per year.	
Private facilities inspected?		NO	
Frequency:		As needed in response to a problem only.	
Checklist used for inspections?		NO	
Have maintenance standards and procedures been established for these facilities?		NO	
How is maintenance prioritized? Is data evaluated to target maintenance resources?		NO	
Applicable Documents		Reviewed	Obtained
Inspection checklist		Does not exist	

Notes
<p>Long-Term Maintenance of Storm Water Management Facilities: The City was aware of 4 publicly-owned stormwater management facilities:</p> <ul style="list-style-type: none"> (a) The post-construction BMP at the fire station built several years ago (b) Bridgeport pond (c) The detention basin at the library (d) Springvale Lake <p>Although the City was aware that a post-construction BMP was installed for the fire station, they were not certain what that structure was or its maintenance needs. It appears that inspection of storm water management facilities is limited to ponds.</p> <p>The City does not have an inventory of private storm water management facilities. They do not inspect privately-owned storm water management facilities.</p> <p>The City does not document inspection results when inspections are performed and has not developed checklists by which to conduct inspections. Checklists for post-construction BMP inspection adopted by local governments are readily available over the internet. Some that you may find useful include the Minnesota Local Road Research Board Stormwater Maintenance BMP Resource Guide at</p>

<http://www.lrrb.org/detail.aspx?productid=2301>, the Stormwater Treatment Practice (STP) Maintenance Resource page at www.stormwatercenter.net/Manual_Builder/Maintenance_Manual/introduction.htm and Seattle Public Utilities at <http://www.mrsc.org/Subjects/Environment/water/SW-Ponds.aspx#Forms>

These are points of deficiency in your post-construction storm water management program. You must develop a program to track the installation of post-construction storm water BMPs in your community and ensure their long-term maintenance. Storm water management facilities include best management practices (BMPs) designed to treat the Water Quality Volume (WQv) and include structures such as bioretention cells, permeable pavements, enhanced water quality swales, sand filters, extended detention ponds, constructed wetlands and proprietary devices (including underground structures). Your long-term maintenance program for post-construction BMPs must be comprehensive and include not only publicly-owned facilities but privately-owned facilities as well. An acceptable post-construction BMP program consists of:

1. Plan review to assure that post-construction storm water quality BMPs are being provided and are designed per required standards
2. Tracking the location, responsible party and long-term maintenance plans for all post-construction BMPs installed in the community
3. Performing an inspection to assure that post-construction BMPs are installed per plan
4. Periodically inspecting or otherwise verifying that the post-construction BMP is being maintained in functional condition
5. Taking enforcement action against the responsible party if they fail to maintain the BMP as required

Developing checklists is important to document the result of post-construction BMP inspections and standardize inspection procedures amongst inspectors. This documentation is also vital to develop a system to track maintenance needs and corrective actions taken and is required for formal enforcement actions.

The Geauga Soil & Water Conservation District (SWCD) has developed a computer program to track plan review, approval, site inspections, long-term maintenance plans and enforcement activity for both the construction and post-construction minimum control measures (MCMs). For information on how to obtain a copy of this program, please contact Carmella Shale of the Geauga SWCD at (440) 834-1122.

Road Maintenance	
Interview Questions	Response
Streets regularly swept?	YES
Frequency:	Once to maybe twice per year. Start in April. Do have schedule to make their way through all streets. Frequency increases if there are complaints from residents.
Frequency based on water quality factors (e.g. proximity to streams)?	NO
How are spoils disposed of?	Same as catch basin cleanings. See deficiency under Catch Basin Cleaning section of this worksheet.
Does the community collect road kill?	YES

Road Maintenance			
Interview Questions		Response	
What do they do with the carcasses?		Dog warden throws carcasses in dumpster for disposal at landfill.	
Does the community have a leaf collection program?		YES	
What do they do with the collected leaves?		Contractor collects leaves from tree lawns and takes them to the North Olmsted Compost Facility on Bradley Road. This facility has a Class IV composting license. See Facility Inspection Worksheet for comments and recommendations for this facility.	
BMPs used during road maintenance activities? Describe types of road maintenance conducted by community staff and the BMPs used		YES City contracts out: major asphalt recycling, asphalt overlaying streets, emergency repairs, road striping. City does itself: pothole fillings, partial depth filling, crack sealing, some concrete work, curb replacements, catch basin adjustments, spot striping City did not describe any BMPs used during road maintenance activities. See comments below.	
BMP guidance available to field staff?		NO	
Deicers used by MS4?		YES	
Type and amount of deicer and additives tracked? What measures are being taken to minimize the application of deicers?		YES Sensible salting policy is followed.	
Sand/salt swept up after application? How soon?		YES But primarily only after big storm. Done within 24 hours.	
Applicable Documents		Reviewed	Obtained
BMP guidance		Does not exist	Does not exist
Street sweeping records		YES	YES
Deicer application records		YES	YES

Notes
Street Sweeping Be aware that the new Annual Report Form requires the City to track and report the amount of street

Notes

sweepings and catch basin cleanings collected annually. Please be sure that you are collecting this information for inclusion in your 2009 annual report, due April 1, 2010.

Street sweepings, like catch basin cleanings, are a solid waste and must be disposed of accordingly. Any leachate from these materials is a wastewater and must be disposed of accordingly. Although the City indicated during the interview that a dewatering pad and dumpster system had been implemented at the WWTP to properly manage street sweepings, our inspection of that facility indicated that proper procedures were not being followed.

Management of Road Kill

Road kill appears to be properly managed. Although it was stated that road kill is taken to a landfill, it may also be composted at a licensed Class II composting facility. For a list of licensed facilities in your area, please refer to www.epa.ohio.gov/dsiwm/pages/general.aspx.

BMPs for Road Maintenance

The City does not appear to have incorporated the use of storm water BMPs during road maintenance activities. Possible BMPs include the use of storm drain inlet protection to keep sediment out of the storm sewer system when sawcutting for curb replacements and checking the weather forecast before road striping to be sure that paint can dry before it rains.

No specific informational brochures or training materials have been provided for road crews, but the City states they use common sense. The City indicated that when it had an in-house engineering department, information on storm water pollution prevention would be put in paychecks. This is not occurring anymore now that the City has contracted out engineering services to a private consulting firm. There is some information posted on the walls, but there is no active employee training program at this time. Please be sure that municipal road maintenance crews have received training on storm water pollution prevention for construction activities. This is a deficiency in your pollution prevention and good housekeeping program. Part III.B.6.e of the NPDES Permit #OHQ000002 requires the City to conduct employee training on storm water program issues at least once annually.

Deicer Application

The City currently utilizes rock salt (NaCl) for road deicing, but will pretreat surfaces with brine before a snow event. This practice helps salt stick and allows for less salt usage. Liquid calcium is added during extreme cold weather events. The City has adopted and implemented the sensible salting policies recommended by Cuyahoga County.

The City had one salt spill from a truck three years ago. After bigger storm events, they do push salt that spills during the loading process back inside the dome. Although the City does not sweep up spilled salt from weaker storm events, they have installed a ramp so that the operator of the loader can see the truck better and spill less salt in the process. Sweeping up salt spills should be a regular activity with all storm events.

Flood Management			
Interview Questions		Response	
Inventory of flood management structures completed?		NO	
Structures been assessed for stormwater retrofit?		NO	
New structures include water quality considerations?		NO	
Applicable Documents		Reviewed	Obtained

Flood Management	
Interview Questions	Response
Inventory	Does not exist

Notes
<p>Inventory of Flood Management Structures</p> <p>The City does not currently have an inventory of flood management structures. However, the City states that most of these structures are below-ground.</p> <p>Publicly-owned flood management structures are part of the MS4 and must be inventoried and included on the map of the MS4 system required under Part III.B.3 of NPDES permit #OHQ000002. Privately-owned flood management structures often serve a dual purpose as the post-construction BMP for new development and redevelopment. If this is the case, then they, too, must be included on the map required under Part III.B.3. In addition, Part III.B.5 of the NPDES permit requires the City to develop a long-term maintenance program to assure that these structures continue to function as intended (see Notes under the Storm Water Management Facilities Operation and Maintenance of this worksheet). Thus, it is important for the City to have an inventory of these structures, whether they are above or below ground. Failure to have an inventory of flood management structures is a deficiency of your MS4 program.</p> <p>Look for Retrofit Opportunities</p> <p>Although the City has passed a post-construction BMP ordinance and reviews plans to be sure BMPs are provided, this only applies to projects where 1 or more acre of land is disturbed. This program will not create BMPs in previously-developed areas unless they are being redeveloped and the 1-acre threshold is met.</p> <p>The City of North Olmsted is largely built-out. For this reason, it is important to look for retrofit opportunities by making a list of potential water quality enhancement projects and focusing on the implementation of green infrastructure. Suitable retrofit projects may include installing bioretention cells in existing parking lots or along residential streets, resurfacing with permeable pavement and establishing incentive programs for rain gardens, rain barrels and other forms of downspout disconnection in residential neighborhoods. Ohio EPA currently has grant money available to implement green infrastructure projects on publicly-owned property. For more information about the Surface Water Improvement Fund (SWIF), please contact Russ Gibson of Ohio EPA at (614) 644-2020.</p>

Facilities Operation & Maintenance							
Interview Questions	Response						
Inventory of MS4 facilities complete (i.e. facilities owned and operated by the MS4)?	YES						
<p><u>Does the City Operate Any of These Facilities?</u> <i>These need their own NPDES storm water permit for industrial activities, if there is a discharge of runoff from these operations:</i></p> <ul style="list-style-type: none"> • Landfills Type: _____ • Solid Waste Transfer Stations 	<table border="0"> <tr> <td style="text-align: center;"><u>Response</u></td> <td style="text-align: center;"><u>SWP3 Developed?</u></td> </tr> <tr> <td style="text-align: center;">NO</td> <td style="text-align: center;">N/A, since do not operate</td> </tr> <tr> <td style="text-align: center;">NO</td> <td style="text-align: center;">N/A, since do not operate</td> </tr> </table>	<u>Response</u>	<u>SWP3 Developed?</u>	NO	N/A, since do not operate	NO	N/A, since do not operate
<u>Response</u>	<u>SWP3 Developed?</u>						
NO	N/A, since do not operate						
NO	N/A, since do not operate						

Facilities Operation & Maintenance

Interview Questions	Response	
	Response	SWP3 Developed?
<ul style="list-style-type: none"> • Composting Operations <ul style="list-style-type: none"> ✓ No discharge of leachate permitted • Airports • Shipping Ports • Steam Electric Power Plants • Wastewater Treatment Plants ≥ 1 MGD or with a pretreatment program 	<p>YES</p> <p>NO</p> <p>NO</p> <p>NO</p> <p>YES</p>	<p>N/A</p> <p>N/A, since do not operate</p> <p>N/A, since do not operate</p> <p>N/A, since do not operate</p> <p>NO See Notes.</p>
<p><i>These do not need their own permit:</i></p>		
<ul style="list-style-type: none"> • Impound Lots – contracted • Leaf Collection Yards <ul style="list-style-type: none"> ✓ No discharge of leafate permitted • Maintenance Yards <ul style="list-style-type: none"> ➤ How many do they operate? <u> 1 </u> ➤ List facility names/locations: 5200 Dover Center Road North Olmsted, OH 44070 	<p>NO, contracted out</p> <p>NO</p> <p>YES</p> 	<p>N/A, but need contract language</p> <p>N/A, since do not operate</p> <p>YES</p>
<ul style="list-style-type: none"> • Parks <ul style="list-style-type: none"> ➤ How many in UA? <u> 3 </u> ➤ List facility names/locations: See File. No maintenance facilities at any park. 	<p>YES</p>	<p>N/A</p>
<ul style="list-style-type: none"> • Parking Lots <ul style="list-style-type: none"> ➤ How many do they operate? <u> 7 </u> ➤ List facility name/locations: 	<p>YES</p>	<p>N/A</p>
<p>The City operates parking lots at all parks, the recreation center, city hall, two fire stations and the WWTP. City does parking lot sweeping about once per year.</p>		
<ul style="list-style-type: none"> • Bus Terminals • Vehicle Maintenance Garages <ul style="list-style-type: none"> ➤ How many do they operate? ➤ List facility name/locations: 5200 Dover Center Road North Olmsted, OH 44070 	<p>NO</p> <p>YES</p> 	<p>N/A, since do not operate</p> <p>YES</p> <p>Vehicle maintenance garage included with SWP3 for municipal maintenance facility.</p>

Facilities Operation & Maintenance	
Interview Questions	Response
<p>Facilities inspected?</p> <p>Frequency:</p>	<p style="text-align: center;">YES</p> <p>The City conducts storm water inspections at the Municipal Maintenance Facility and the Bradley Road Compost Facility.</p> <p><u>Maintenance Facility</u> The yard is inspected daily for oil leaks from equipment. A more thorough inspection for storm water pollutants is conducted twice per year.</p> <p><u>Compost Yard</u> The yard is inspected several times a year.</p> <p><u>Wastewater Treatment Plant</u> This facility is not inspected for storm water pollution prevention measures because the facility was under the impression that a condition of No Exposure exists. See Notes below.</p>
<p>Checklist used?</p>	<p style="text-align: center;">NO</p> <p>Ohio EPA recommends that the City develop storm water inspection checklists for the Municipal Maintenance Facility, Compost Yard and Wastewater Treatment Plant. Checklists help standardize inspections and remind inspectors of the critical areas that must be reviewed during each site inspection.</p>
<p>Staff which perform the inspections (department or agency):</p>	<p><u>Maintenance Facility</u> Staff from the Service Department has been trained to conduct storm water inspections and to apply Oil-Dri when oil leaks are noted in the yard. Spent absorbent is disposed in drums.</p> <p>Please be sure to provide refresher training as needed. Training must include all areas of the facility with storm water pollution concerns.</p> <p><u>Compost Yard</u> The yard is inspected by the Cuyahoga County Board of Health (CCBH) in conjunction with staff from the Service Department. Although the inspection by CCBH touches upon leachate control issues, this inspection is conducted to determine compliance with your Class IV Composting License, not storm water pollution prevention. The scope of these inspections should be broadened to include all storm water</p>

Facilities Operation & Maintenance	
Interview Questions	Response
	<p>concerns.</p> <p>If you are relying on CCBH to perform storm water inspections and provide documentation, please be sure that these obligations are identified in the Memorandum of Understanding (MOU). An MOU or contract is required between the City and every third-party storm water service provider.</p>
Is there a designated stormwater contact person for each facility?	NO
	<p>Please note that facilities that require an SWP3 must have a designated Pollution Prevention Team. Designating an individual to be in charge of the team will give "ownership" of storm water concerns to that individual. This should lead to more vigilant implementation of the SWP3.</p>
Describe enforcement procedures used to address noncompliance on a MS4-owner facility, i.e., what disciplinary measures are taken against those that do not implement standard operating procedures?:	<p>Service Department staff is unionized. Any disciplinary procedures must be in accordance with the union contract.</p> <p>To date, the City has not taken any disciplinary action against employees for failure to implement storm water pollution prevention measures. Please be sure to take appropriate disciplinary action when required.</p>
Parking lots owned/operated by the permittee swept?	YES
Frequency?	<p>Lots are swept once per year, usually in the Fall. Ohio EPA recommends that lots also be swept in the Spring after snowmelt to remove grit and other pollutants that accumulate in snowbanks.</p> <p>If parking lots will only be swept once per year, Ohio EPA recommends sweeping them in the Spring rather than the Fall.</p>
Do you have any combined sewer systems?	NO
If yes, do you have any combined sewer overflows?	N/A
<ul style="list-style-type: none"> ➤ How many? _____ ➤ Do you track frequency and volume? 	
Are you aware of any illicit cross connections between your sanitary sewer and MS4?	NO

Facilities Operation & Maintenance		
Interview Questions	Response	
If so, what is your plan to eliminate this illicit discharge?	<p>The City contracts with the CCBH to perform dry weather screening and identify illicit discharges to the MS4. CCBH has not identified any cross connections between the sanitary sewer system and the MS4. However, they did find sludge being applied to fields at the North Olmsted High School at one time. The City believes this practice has stopped.</p> <p>Please see Notes under MS4 Mapping section of this worksheet regarding expected actions the City must take when CCBH identifies an illicit discharge.</p>	
<p>Have you investigated the extent of infiltration and inflow into storm sewer system?</p> <p>What methods have been used to conduct this investigation?</p> <p>What are your plans to repair and eliminate this source of illicit discharge?</p>	<p>NO</p> <p>CCBH dry weather screening has not identified this as an issue. Their reports should show if it is a problem. Then, City would address it.</p> <p>Staff at the WWTP (Bing) has the responsibility to follow-up on the illicit discharges identified in CCBH reports. However, there does not seem to be a reporting/tracking system to document what actions are being taken to eliminate illicit discharges.</p>	
Sewer spill and cleanup procedures in place?	<p>YES</p> <p>Sharon Schlemmer, superintendant at the WWTP, has developed a sewer spill plan. The last incident was the White Haven sewer spill in 2008. It was caused by a contractor hitting a sanitary force main. Please be sure that the sewer spill plan provides measures to prevent discharges to the MS4.</p>	
Applicable Documents	Reviewed	Obtained
Facility inventory	YES	YES
Facility SWPPP	NO	NO

Notes
<p>Storm Water Pollution Prevention Plans</p> <p>A Storm Water Pollution Prevention Plan (SWP3) must be developed and implemented for the following facilities:</p> <p>City of North Olmsted Municipal Maintenance Facility 5200 Dover Center Rd North Olmsted, OH 44070</p>

Notes

North Olmsted Wastewater Treatment Plant
23775 Mastick Rd
North Olmsted, OH 44070

The Ohio EPA General Storm Water NPDES Permit for Small MS4s #OHQ000002 requires you to develop and begin implementing the SWP3s within 2 years of permit renewal, i.e., by June 3, 2011. Facilities must be inspected at least once per year and a record of the inspection and its findings must be kept with the SWP3. If this annual inspection reveals deficiencies in the SWP3 or BMPs that are ineffective, the SWP3 must be revised to correct the problems. SWP3s must contain a checklist to by which to conduct the facility inspection.

An SWP3 is not required for the Bradley Road Compost Facility, must similar pollution prevention measures (and inspections) must be implemented at this facility.

Municipal Maintenance Facility

The City indicated that a Storm Water Pollution Prevention Plan (SWP3) has been developed for this facility, but a copy was not provided to us during this audit. A utility map was posted on the wall inside the facility, but this is only one component of an SWP3. If a SWP3 currently exists, please submit a copy of the SWP3 with your response to this audit. Otherwise, be aware that the SWP3 must be completed and implemented by June 3, 2011.

Findings from our inspection of this facility are summarized in the Facility Worksheet for the City of North Olmsted Municipal Maintenance Facility. There are minor compliance issues at this facility.

Composting Operations

See Facility Inspection Worksheet for the Bradley Road Compost Facility. There are several issues that must be addressed. Inspections at this facility must be broadened to include all storm water pollution concerns.

Wastewater Treatment Plant

The Ohio EPA processed a No Exposure Certification for the City of North Olmsted Wastewater Treatment Plant on June 5, 2009. However, our inspection of the facility indicates that this facility does **not** qualify for No Exposure Certification. See Facility Inspection Worksheet for the North Olmsted Wastewater Treatment Plant for more information. Thus, the City must obtain an NPDES permit to discharge storm water from the WWTP.

Ohio EPA records show that the City's NPDES permit (#3PD00016*KD) to discharge wastewater from the facility is currently going through the renewal process. Ohio EPA will add Parts 4, 5 and 6 to that permit to authorize storm water discharges from the WWTP. However, the City must submit Form F of the individual NPDES permit application. Form F requires you to sample runoff from storm water outfalls at the facility. You must sample runoff that results from a 0.1-inch or greater storm event that has not occurred within 72 hours of another storm event of 0.1-inch or greater. When completed, please submit Form F to Sandy Cappotto at the Ohio EPA Northeast District Office, Division of Surface Water. If you have further questions, please contact Sandy at (330) 963-1124.

Pesticides, Herbicides & Fertilizers

Interview Questions	Response
Certified applicators used?	YES
Integrated Pest Management (IPM) practices used?	NO

Storage location of pesticides, herbicides, and fertilizers:	They are stored in a lockable cabinet in the service garage.		
BMPs used during application:	<p><u>Fertilizer</u> The City does not apply fertilizer. This activity is contracted out to a third party.</p> <p>Please be sure that contract language between the City and the contractor identifies the requirement to implement BMPs such as sweeping up fertilizer applied to paved surfaces and restrictions on when fertilizers can be applied.</p> <p><u>Pesticides and Herbicides</u> The City only spot applies herbicides and pesticides, however be sure that staff is trained on ways to prevent discharges to the MS4.</p>		
Fertilizer/pesticide application plan utilized?	YES		
	However, plans are not very detailed and should consider storm water pollution prevention requirements.		
Applicable Documents		Reviewed	Obtained
Fertilizer/pesticide application plan		YES	YES

Notes
<p>One Service Department staff member (Dave Wendall) has a commercial applicator license, but most is done by contractor. The City primarily does spot spraying for weeds and leaf disease control. The State of Ohio sprays for Gypsy Moths. Staff has been trained by Dave, but they apply the pesticides under his supervision. Please be aware that the Ohio Department of Agriculture requires that Mr. Wendall keep certain records and be within 2 hours of the City when pesticides and herbicides are applied by staff.</p> <p>Fertilizers are applied 3-4 times per year, some only get a herbicide for weeds.</p>

Standards, BMPs, & Outreach	
Interview Questions	Response
BMP technical guidance document available to maintenance staff?	NO
MS4 use contractual staff to complete MS4 maintenance activities?	YES
BMP guidance materials provided to contracted staff?	NO
Requirement to consider stormwater impacts and utilize appropriate BMPs in contracts?	NO
Materials used to educate the public regarding stormwater impacts on MS4 property (if applicable,	<p><u>Pet Waste</u> Pets are not allowed in the parks. The City has</p>

Standards, BMPs, & Outreach		
Interview Questions	Response	
i.e. public spaces):	<p>enforced homeowners cleaning pet wastes within tree lawns. City has sent brochures with this info.</p> <p><u>Litter Reduction</u> Property Maintenance has made issue about litter at the I-480 Great Northern interchange.</p> <p>In addition, the Municipal Maintenance Facility is a collection center for household hazardous waste. Materials collected include computers, batteries, scrap metal dumpster round-up and paint cans. Batteries are stored indoors on pallets. Paint cans are brought indoors during household hazardous waste collection days, but at other times of the year, the quantity received is much lower. So, cans dropped off at other times of the year, go into a UHaul box under a shelter.</p>	
Applicable Documents	Reviewed	Obtained
BMP manual or guidance document	Does not exist	
Contract language for MS4 operation and maintenance activities	NO	NO

Notes
<p><u>BMP Guidance</u></p> <p>Currently, there are no resources available to the municipal staff on Storm Water BMPs. The City was informed on how to develop material that will let staff understand their contribution to storm water pollution and what methods they can use to limit the pollutants. This could also include binder or flip books placed in vehicles or in a locker room for easy reference. For more ideas, please consult the <i>Rainwater and Land Development</i> manual (ODNR, 2006). We also recommend you review the <i>Municipal Pollution Prevention/Good Housekeeping Manual #9</i> (Center for Watershed Protection, September 2008). This manual is available as a free download on their website.</p> <p>It was also noted that there has been no language in municipal contracts with third party service providers to require them to use best management practices to prevent storm water pollution. Please be sure to include language in RFPs and contracts with contracted service providers that requires the use of storm water best management practices when conducting their activities.</p> <p><u>Public Education and Outreach</u></p> <p>The City relies on the Cuyahoga Soil & Water Conservation District (SWCD) to provide this service. An issue of the SWCD newsletter is distributed to citizens and the SWCD provides information to be displayed in the lobby of City Hall. In addition, the City passes out brochures with stormwater-related information at the Homecoming Parade. Citizens were encouraged to participate in a stream clean-up event in Rocky River.</p> <p>Please be aware that the performance standards established in NPDES permit #OHQ000002, i.e., the permit in effect for the next 5-year term, requires the City to use more than 1 mechanism and target at least 5 different storm water themes or messages over the permit term. In addition, you must provide</p>

Notes
<p>at least 5 public involvement opportunities over the permit term. Ohio EPA encourages the City to focus on effective measures. Displaying information in the lobby of City Hall will only have a certain reach, as many residents never enter City Hall. Certain activities, such as stream clean-ups or storm drain stenciling projects with local boy scout troops, can count toward both education and participation requirements because they involve the public as well as educate them on storm water pollution issues. However, you must be able to track participation by the residents of North Olmsted. Events held in other communities may not draw any residents from North Olmsted, and thus, have no impact to your MS4 program.</p>

Staff Education and Training			
Interview Questions	Response		
Staff trained to identify potential storm water pollution sources which would result in an illicit discharges?	YES		
Frequency:	There is no set schedule. The City appears to take opportunities for education when they are available.		
Materials used to train staff:	The City uses materials presented at workshops hosted by the Ohio EPA Office of Compliance Assistance and Pollution Prevention (OCAPP) and the CCBH.		
Applicable Documents		Reviewed	Obtained
Training materials		YES	YES

Notes
<p>CCBH did hold a training event on storm water pollution prevention for municipal operations for City staff in June 2009. In addition, the City did attend some of the MS4 workshops provided by Ohio EPA in 2007-2008. However, the City will have limited ability to provide training during the next fiscal year because Council removed all training budgets. Thus, the City can only attend free workshops.</p> <p>Please be aware that Ohio EPA has brought together a number of agencies that provide storm water education services under the umbrella of the NE Ohio Storm Water Training Council. Information about upcoming training opportunities can be found on the Ohio EPA website at:</p> <p>www.epa.ohio.gov/ocapp/storm_water.aspx</p> <p>Ohio EPA strives to provide these training events at the lowest cost possible and a number of these events are free. All information presented at these workshops is archived at this website, so if you cannot attend, you can still access the information at a later time. In addition, US EPA has provided a number of free webcasts on all six minimum control measures. These can be accessed at:</p> <p>www.epa.gov/npdes/training</p> <p>Finally, the Lake County Storm Water Management Department has developed a series of Tool Box Talks that can be used at staff meetings to provide storm water education. Each "talk" focuses on one municipal storm water topic and encourages We encourage you to review the information provided at</p>

Notes

these websites and incorporate it into your MS4 program.

FIELD INSPECTION WORKSHEET

MS4 SWMP Evaluation North Olmsted Maintenance Facility Field Inspection Worksheet

Permittee: City of North Olmsted	
Address of facility: 5200 Dover Center Rd.	Size of facility: 2 ac
Date of visit: August 12, 2009	Time of visit: 11:30 am
Provide the name(s) and title(s) of permittee staff present during inspection	
Name	Title
Duane Limpert	Service Director
Dan Collins	Asst. City Engineer
Tim Conway, Al Herman, Dave Wendall	Service Dept. Staff
Evaluator Observations:	
SWPPP or stormwater plan	
Has the maintenance facility developed a SWPPP or stormwater plan?	NO (see Notes)
Does the plan include a site map, list of pollutant sources, BMPs, and maintenance procedures?	Site map posted on wall at facility, but is only one component of an SWPPP (SWP3).
Does the permittee conduct and document periodic inspections of the facility?	Staff does a walk-through inspection of the yard daily, but there are no documented storm water inspections for this facility. Ohio EPA expects that at least one comprehensive site evaluation, i.e., storm water site inspection with checklist, be conducted per year.
Are storm drains labeled and free of debris?	Not labeled. We recommend some labeling or color coded system be implemented, e.g., paint grates blue or attach "Drains to Waterways".
Vehicle maintenance, fueling and washing	
Are vehicle maintenance activities conducted in a designated place not exposed to stormwater?	YES. Performed indoors where drains pass through an oil/water separator before connecting to the sanitary sewer system. The City has tested drains to verify connection to the sanitary sewer system.
Are fueling stations properly designed with spill kits nearby?	YES. The station is roofed and equipped with automatic shut-off valves, breakaway hoses and Oil-dri to absorb spills. However, we recommend a larger, more obvious sign to identify the emergency shut off valve.
Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer?	YES. Vehicles are washed indoors in a controlled area. Drains are connected to the sanitary sewer system and a riser prevents larger grit and debris from clogging the drainage system. Materials trapped by the riser are removed via vacuum truck and taken with catch basin cleanings to the WWTP

(See Facility Inspection Worksheet for WWTP).

Material storage

Are all materials that are potential stormwater contaminants stored under cover or in secondary containment?

Some YES and some NO. See Notes below.

Hazardous waste management

Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff?

NO. Hazardous materials such as oil should be stored in secondary containment to catch spills. Also, Ohio EPA Division of Hazardous Waste Management regulations require drums containing used oil to be labeled "Used Oil", not "Waste Oil".

Waste management

Are waste bins covered with waste properly disposed in containers?

NO. The solid waste dumpster must be lidded or tarped when not actively placing in or removing materials from it.

How is landscape waste stored?

No landscape waste observed at this facility. City operates a licensed compost yard on Bradley Road. (See Facility Inspection Worksheet for Bradley Road Compost Yard).

Spill response

Does the facility have a spill response plan, and are spill kits readily available?

NO. No written spill response plan. This should be part of the SWP3. See Notes below.

Employee training

What type of stormwater training do maintenance staff receive?

Notes or additional information:

Storm Water Pollution Prevention Plan

During the interview portion of the inspection, the City indicated that an SWP3 had been developed for the Maintenance Facility. However, the only information we were able to confirm was a utility map posted on the wall at the Maintenance Facility. This map is one component of an SWP3, but is not a complete SWP3. Thus, it appears that a SWP3 has not been developed for this facility. Be aware that a SWP3 must be completed and implemented by June 3, 2011. See www.epa.ohio.gov/ocapp/storm_water.aspx for guidance on developing an SWP3 for this facility.

Material Storage

Tires, recycling materials and pesticides were properly stored. However, we recommend all drums and buckets containing liquids be stored within secondary containment, e.g., placed on spill containment trays, even if they are stored indoors.

Vehicles and snow plows are stored out in the yard. We observed hydraulic fluid leaking from the plows. Leaking plows must be repaired and spills cleaned-up. If leaks cannot be prevented, plows should be moved to a storm-resistant shelter for storage and absorbent pads must be placed under the plows to capture spills.

The roof of the salt storage dome requires repair to fix holes. Some salt was observed outside the dome, so City needs to do a better job of sweeping salt back under cover. The City has even installed a ramp so that

the loader can better see the truck bed and minimize spills that occur during the loading process. The storm drain near the brine and calcium tanks must be covered when transferring materials into or out of the tanks to protect against spills. One method to do this is to place a pig mat on the drain.

Construction debris from a municipal project is being temporarily stored in the parking area at the SE corner of the facility. Storm drain inlet protection has not been installed on catch basins to prevent sediment from discharging into the MS4. Mr. Limpert was instructed to install inlet protection. When approving an area to store stockpiles of erodible material, please review the location to determine the sediment and erosion controls that must be implemented before allowing material to be stored there.

Spill Response

Two spill kits are available inside the maintenance building, but they are stored in areas that may be difficult to access quickly (a locker and a closet). Spill kits should be stored in the areas where spills are likely to occur, e.g., where oil is changed in vehicles. Also, the “spill kit” at the fuel island consists only of Oil-Dri. We recommend a more robust spill kit be available at the fuel island to better respond to possible spill events. All spill kits should be clearly labeled so that they can be identified quickly when needed.

Oil/Water Separators

There are two oil/water separators at this facility. The one that serves the Service Area was last cleaned out in 2007. The one that serves the Maintenance Area was cleaned out in 2008. However, the City could not provide documentation to verify these dates. Although the City indicates that these separators are connected to sanitary sewers, we recommend that you establish a schedule to inspect and clean-out these devices on a regular basis.

MS4 INSPECTION PHOTOS

North Olmsted Maintenance Facility

5200 Dover Center Rd.

North Olmsted, OH

Cuyahoga County

Photos Taken: August 12, 2009

By: Lindsie MacPhearson, DSW-NEDO



Fig 1 (LEFT). Construction debris is stored in the SE corner of the facility. Runoff drains to the storm sewer catch basin noted in photo, allowing the discharge of sediment solids to the MS4.

Fig 2 (RIGHT). Hydraulic fluid leaks from a snow plow, staining the parking lot where it is stored.

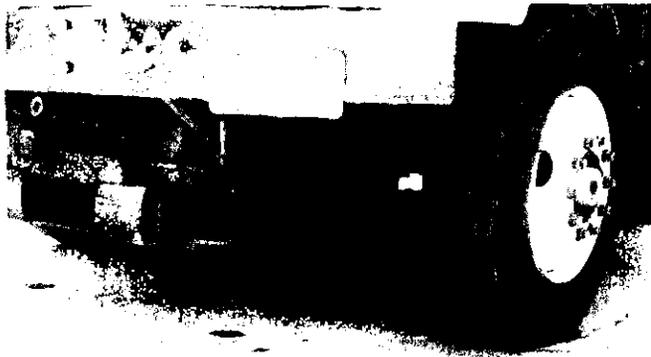


Fig 3. City vehicles must be maintained so that they do not leak pollutants to the environment. Although we did observe Oil-Dri spread on several other leaks, none had been placed on this one.

Photos Taken: August 12, 2009



Fig 4 (LEFT). Holes in the roof of the salt dome allow storm water to enter the dome and come in contact with salt. Holes must be patched up. Also, note that salt is not fully pushed back under cover, leaving it exposed to storm water.

Fig 5 (RIGHT). Salt loading ramp, storage dome and brine tanks.



Fig 6 (LEFT). A rust-colored residue is discharging from these trucks and is entering the storm drain system. Please identify the nature of the material and implement BMPs to eliminate this discharge.

Fig 7 (RIGHT). Stockpiles of landscaping soil and mulch were appropriately tarped.



Fig 8 (LEFT). A utility map of the maintenance facility is posted inside the facility.

Fig 9 (RIGHT). Be sure this floor drain in this connected to the sanitary sewer system.



Fig 10 & 11. Photos of the pit where vehicle maintenance such as an oil change is performed. The drain trays are connected to a used oil storage tank. The floor drains are connected to an oil/water separator and then to the sanitary sewer system.



Fig 12. Used oil drums are not properly labeled. Ohio EPA regulations required used oil drums to be labeled "Used Oil". Also, drums are not stored within spill containment.



Fig 13 (LEFT). Containment is provided for some fluids.



Fig 14 (RIGHT). The pesticide storage cabinet at the maintenance facility. The cabinet can be locked and cabinet is designed to contain spills.

FIELD INSPECTION WORKSHEET

MS4 SWMP Evaluation

North Olmsted Wastewater Treatment Plant Facility Field Inspection Worksheet

Permittee: City of North Olmsted	
Address of facility: 23775 Mastick Rd	Size of facility: approx. 4 ac
Date of visit: August 12, 2009	Time of visit: 1:00 pm
Provide the name(s) and title(s) of permittee staff present during inspection	
Name	Title
Duane Limpert	Service Director
Sharon Schlemmer	Superintendent of WWTP
Bing	WWTP
Evaluator Observations:	
SWPPP or stormwater plan	
Has the maintenance facility developed a SWPPP or stormwater plan?	<p>NO. Facility was under the impression that a condition of No Exposure exists. However, our inspection revealed that there are several points of exposure. See Notes below.</p> <p>Parts IV, V and VI will be added to the facility's NPDES permit to authorize storm water discharges from this facility. This will require you to implement a Storm Water Pollution Prevention Plan (SWPPP or SWP3).</p>
Does the plan include a site map, list of pollutant sources, BMPs, and maintenance procedures?	Include in SWP3.
Does the permittee conduct and document periodic inspections of the facility?	<p>Not for storm water issues. The storm water language added to your NPDES permit will require you to perform an annual Comprehensive Site Evaluation. In addition, the SWP3 must establish a more frequent, regular site inspection schedule (we recommend a minimum of once per month).</p> <p>Ohio EPA also recommends that a storm water inspection checklist be created for the facility and be included in the SWP3. Using checklists to conduct site inspections will help assure that nothing is overlooked and create consistency amongst inspectors.</p>
Are storm drains labeled and free of debris?	Drains are free of debris, but are not labeled.
Vehicle maintenance, fueling and washing	
Are vehicle maintenance activities conducted in a designated place not exposed to stormwater?	Only minor vehicle maintenance is performed at this facility. Please be sure that these activities are performed indoors.
Are fueling stations properly designed with spill kits nearby?	There is no fueling station at this facility.
Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer?	A bay to wash vehicles is located indoors. All interior drains are connected to sanitary.
Material storage	
Are all materials that are potential stormwater	NO. See Points of Exposure in Notes below.

contaminants stored under cover or in secondary containment?	
Hazardous waste management	
Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff?	YES. All hazardous materials are stored indoors.
Waste management	
Are waste bins covered with waste properly disposed in containers?	NO. Bins to store sludge, catch basin cleanings and street sweepings had tarps, but were not tarped at the time of inspection. Also, piles of street sweepings and catch basin cleanings were stored outside on the pavement rather than in the bin as required. This is a violation of ORC 3734.03.
How is landscape waste stored?	No landscape waste was observed at this facility.
Spill response	
Does the facility have a spill response plan, and are spill kits readily available?	Please be sure to include a spill response plan with your SWP3. If you currently have a spill response or SPCC plan, it can be included via reference in the SWP3. If this route is taken, the spill response or SPCC plan must be kept with the SWP3.
Employee training	
What type of stormwater training do maintenance staff receive?	See interview. Please be sure that employees of the WWTP are included in storm water training events.

Notes or additional information:

Points of Exposure at WWTP

Our inspection revealed there are numerous points where pollutants have exposure to storm water:

1. Rusty scrap materials and spare parts are stored outside.
2. Fleet vehicles are parked outside. Automotive fluids can drip from fleet vehicles that are not well-maintained.
3. Chlorine and sodium aluminate tanks are filled via connection points that are on the outside of their respective storage buildings. Trucks and connection points are not within a storm resistant shelter. Spills would lead to a discharge of these materials to the MS4.
4. "Rags" are transferred from the Influent Building to a dumpster located outside creating the potential for exposure when spills or incomplete transfers occur.
5. Sludge dumpsters are located outside. Although tarps were available, the dumpsters were not covered on the date of inspection. Also, need to assure that dumpsters are in good condition and do not allow liquids to leak from them.
6. Catch basin cleanings and street sweeping piles were observed outside on pavement rather than in the storage dumpster they were supposed to be stored in.

It is our understanding that major renovations are to occur at the WWTP in 2011. Please note that many of these points of exposure can be eliminated through source control such as roofed or otherwise sheltered storage and transfer areas. In addition, rather than constructing storm-resistant shelters, a number of WWTPs have re-routed the storm water drainage systems at the plant so that they discharge into the treatment headworks. This, too, would eliminate exposure. As you determine how you move forward from here, do not overlook this opportunity to address storm water requirements through site design.

Identifying Storm Drains

Storm drains appear to discharge to a swale along the Mastick Road entrance. A map of the storm drainage system, including catch basins, must be developed for the SWP3. In addition, we recommend labeling storm drains by either painting them a specific color or attaching a message to them such as "Do not dump...drains to river". This will raise awareness of the drainage system, which should lead to better implementation of the SWP3.

INSPECTION PHOTOS

North Olmsted Wastewater Treatment Plant
Photos Taken By: Lindsie MacPhearson, DSW-NEDO
Date: August 12, 2009

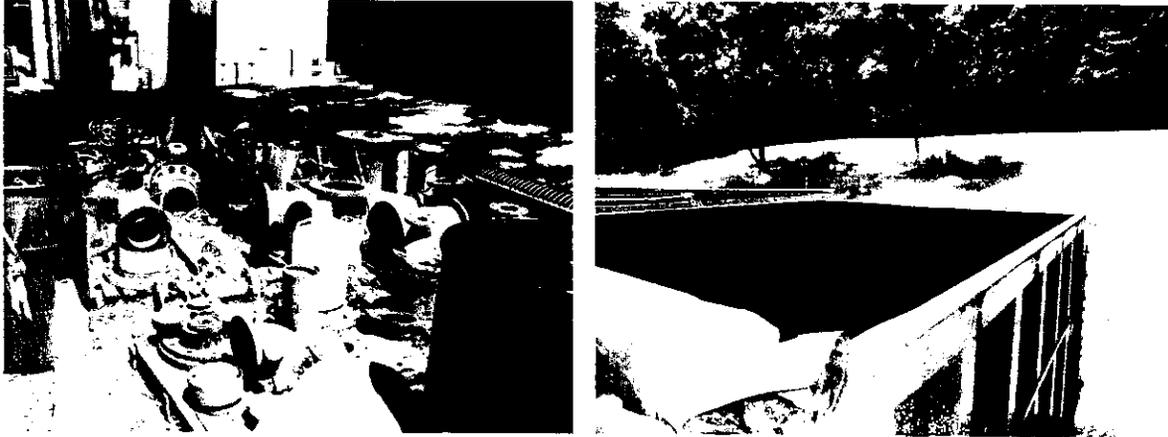


Fig 1 (LEFT). Spare part and scrap metal storage yard. Parts that have no use should be taken to a scrap yard for recycling. Parts you intend to reuse should be stored under a cover or indoors.

Fig 2 (RIGHT). Sludge storage bins were not tarped on the date of inspection. Although they were largely empty, some residue still remained in the dumpsters.



Fig 3. Pile of street sweepings and/or catch basin cleanings stored outside rather than in covered dumpster. This constitutes open dumping and is a violation of Ohio Revised Code 3734.03 and Ohio Administrative Code 3745-27-05(C). These materials are solid wastes and must be stored in a covered dumpster and disposed of at a licensed landfill.

FIELD INSPECTION WORKSHEET

MS4 SWMP Evaluation

Bradley Road Compost Facility Field Inspection Worksheet

Permittee: City of North Olmsted	
Address of facility: Bradley Rd across from Bradley Road Park	Size of facility: approx 2 acres
Date of visit: August 12, 2009	Time of visit: 2:30 pm
Provide the name(s) and title(s) of permittee staff present during inspection	
Name	Title
Duane Limpert	Service Director
Evaluator Observations:	
SWPPP or stormwater plan	
Has the maintenance facility developed a SWPPP or stormwater plan?	Not Applicable (N/A). An SWPPP is not required for this facility, however best management practices for storm water pollutants are required and must be maintained .
Does the plan include a site map, list of pollutant sources, BMPs, and maintenance procedures?	N/A
Does the permittee conduct and document periodic inspections of the facility?	The facility is inspected by the Cuyahoga County Board of Health (CCBH) and a report of findings is provided to the City. However, be aware that these inspections are conducted to determine compliance with the terms and conditions of the composting license rather than storm water issues. We recommend that operations at this facility be reviewed at least once per year to review storm water concerns.
Are storm drains labeled and free of debris?	There are no storm drains at this facility.
Vehicle maintenance, fueling and washing	
Are vehicle maintenance activities conducted in a designated place not exposed to stormwater?	Vehicle maintenance activities do not occur at this facility.
Are fueling stations properly designed with spill kits nearby?	There is no fueling station at this facility.
Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer?	Vehicles are not washed at this facility.
Material storage	
Are all materials that are potential stormwater contaminants stored under cover or in secondary containment?	Runoff from compost piles is classified as leachate, a wastewater. Your MS4 permit does not authorize the discharge of leachate from this property. See Notes. Also, there is a large stockpile of wood chips on this

	property. Stockpiles of wood chips, leaves and other organic matter must be managed to prevent the discharge of leachate created when storm water contacts this material and it decomposes. See Notes.
Hazardous waste management	
Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff?	There are no hazardous materials stored on this property.
Waste management	
Are waste bins covered with waste properly disposed in containers?	There are no waste bins on this property.
How is landscape waste stored?	Landscape waste is composted at this facility. See Notes regarding leachate management and wood chip stockpile.
Spill response	
Does the facility have a spill response plan, and are spill kits readily available?	N/A
Employee training	
What type of stormwater training do maintenance staff receive?	Please be sure that storm water training includes personnel responsible for management of this facility.
Notes or additional information:	
<p><u>Leachate Management</u> Leachate at this facility is collected in a pond. Please be sure that leachate levels in the pond are managed to prevent discharges during storm events. This can be accomplished by:</p> <ul style="list-style-type: none"> (a) Recirculating leachate onto compost piles, or (b) Pumping leachate to the sanitary sewer system (Be sure to discuss this option with the WWTP). <p>Our inspection of the pond revealed that there is evidence of overflow from a breach in the berm in the NW corner. This breach must be repaired. The pond should be inspected before major storm events to determine if action is required to prevent discharge.</p>	
<p><u>Wood Chip Stockpile</u> You must either prevent the creation of leachate from the wood chip stockpile or manage runoff from this pile as leachate. Options available to you include: (a) covering the pile with a tarp, (b) berming around the pile to contain runoff, (c) relocating the stockpile to an area that will drain toward the leachate collection pond associated with composting operations or (d) installing drainage systems that will direct the runoff to the leachate collection pond.</p>	

INSPECTION PHOTOS

Bradley Road Composting Facility City of North Olmsted/Cuyahoga County

Photos Taken By: Lindsie MacPhearson, DSW-NEDO
Date: August 12, 2009



Fig 1 (ABOVE). Pond built to contain leachate from composting operations.



Fig 2 (RIGHT). Although difficult to see due to vegetation, there is a breach in the berm that allows leachate to discharge from the pond. This must be repaired.



Fig 3. A pile of wood chips is stored at the front of the property in an area not designed to drain to the leachate collection pond. Wood chip piles are also sources of leachate and must be managed appropriately.