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CUYAHOGA    FAIRVIEW PARK    CITY OF FAIRVIEW PARK    3GQ00020 2010/07/13    MACPHERSON,  
LINDSIE

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**Environmental  
Protection Agency**

John R. Kasich, Governor  
Lee Fisher, Lt. Governor  
Michael C. Sisk, Director

July 12, 2010

RE: CUYAHOGA COUNTY  
CITY OF FAIRVIEW PARK  
MS4 INSPECTION FINDINGS  
MCM#6-POLLUTION PREVENTION  
FOR MUNICIPAL OPERATIONS

Mr. James Kennedy  
Director of Public Service and Development  
City of Fairview Park  
20777 Lorain Road  
Fairview Park, OH 44126

Dear Mr. Kennedy:

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) 3GQ00020\*BG and Ohio Administrative Code 3745-39.

On June 29, 2010, Ohio EPA met with you and other representatives of the City of Fairview Park 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 Worksheet(s) completed for your community. Please review these documents in detail to determine specific elements where your pollution prevention and good housekeeping program needs 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 submit a Notice of Termination within 45 days of reaching final stabilization on municipal construction projects.** This is a violation of Part IV.A of NPDES permit #OHC000003. Our records show that the City of Fairview Park has 2 active projects permitted under the Ohio EPA General Storm Water NPDES Permit for Construction Activities but indicated during the interview that both projects were completed and have reached final stabilization. Please submit an NOT for both of the completed projects (see attachments for the list of projects).

- **Open dumping of solid wastes at the Rear Service Garage.** This is a violation of ORC 3734.03 and OAC 3745-27-05(C). The stockpiling of catch basin cleanings by the City is considered open dumping. These materials are solid wastes and must be managed as such. Measures must be taken to properly store and manage these solid wastes and associated leachate at the Service Garage. See comments in the attached worksheets for suggestions and recommendations.
- **Failure to implement procedures for the proper disposal of waste removed from your MS4, including City streets.** This is a violation of Part III.B.6.d.iii.3 of the NPDES permit and Ohio Revised Code 6111.04 and 6111.07. The disposal of catch basin cleanings and street sweepings at the Boyas Construction and Demolition Debris Landfill is not an acceptable procedure for the disposal of such solid wastes. This matter was referred to the Ohio EPA Division of Solid and Infectious Waste Management (DSIWM) for follow-up. Also, there is no containment of the pile of catch basin cleanings stockpiled at the Service Garage. The City must implement a system to manage the dewatering and storage of catch basin cleanings to prevent leachate from flowing offsite into waters of the State. See comments in the attached worksheets for suggestions and recommendations.

This violation is also related to leaf composting operations at the Service Garage. We noted that leaf decomposition has created leachate and that this leachate is discharging from the site. The City must implement controls to prevent the discharge of leachate associated with leaf composting operations. The MS4 permit does not authorize the discharge of leachate.

- **Failure to obtain an operating license for leaf composting activities associated with the municipal leaf collection program.** This is a violation of Part V.N of the NPDES permit and ORC 6111.04 and 6111.07. Some leaves collected by the municipal leaf collection program are stockpiled and stored for significant periods of time at the Service Garage at 20777 Lorain Road. The City has not obtained a Class IV composting license from the Cuyahoga County Board of Health (CCBH). This matter was referred to Clarissa Gereby of our Division of Solid and Infectious Waste Management and to CCBH for follow-up. If the City does not wish to continue composting, the area needs to be cleaned up and all composting leaves must be removed and the leachate collected and disposed of properly.
- **Failure to develop maintenance schedules, maintenance activities and long-term inspection procedures for the MS4.** This is a violation of Part III.B.6.d.iii.1 of the NPDES permit and ORC 6111.04 and 6111.07. The City is obligated to ensure that public stormwater infrastructure is functioning properly

and not causing storm water pollution. In order to do that, the City needs to develop standard operating procedures for the MS4 including the adoption of maintenance standards, periodic inspection of MS4 infrastructure and performance of maintenance. The City did indicate some maintenance activities are in place. See Notes in the *Stormwater Management Facilities Operation and Maintenance* section of the Municipal Storm Water Program Evaluation worksheet for information on how to improve your program.

- **Failure to ensure adequate long-term operation and maintenance (O&M) of public/private stormwater management facilities.** This is a violation of Part III.B.5.d of the Ohio EPA General Storm Water NPDES permit and ORC 6111.04 and 6111.07. *The City is required to have an inventory of all privately-owned post-construction BMPs installed since April 21, 2003 and public stormwater management facilities.* The City must develop a program to ensure the long-term maintenance of these structures. Ohio EPA recommends that each facility be inspected at least once a year either by the City or the party responsible for long-term maintenance. We recommend the City develop checklists or adopt checklists as your standard for conducting these inspections. This will ensure that all facilities are inspected and that all BMPs are constructed and maintained according to the City's adopted standards. See Notes in the *Stormwater Management Facilities Operation and Maintenance* section of the Municipal Storm Water Program Evaluation worksheet for information on how to improve your program.
  
- **Failure to provide controls for reducing or eliminating the discharge of pollutants from maintenance and storage yards at the Service Garage.** This is a violation of Part III.B.6.d.iii.2 of the Small MS4 NPDES Permit #OHQ000002 and Ohio Revised Code (ORC) 6111.04 and 6111.07. This violation was noted for the following operations at maintenance and storage yards:
  - Failure to direct all wastewater generated during vehicle and equipment washing operations to a sanitary sewer system or other wastewater treatment system, or otherwise preventing its discharge.
  - Failure to provide containment for the small stockpile of catch basin cleanings. Refer to the Maintenance Facility Field Inspection Worksheet for the Service Garage for more information.
  - Failure to implement controls to prevent the discharge of leachate associated with composting operations.
  - Failure to provide containment for hazardous materials, e.g. full barrels and drums, paints, old tanks and open asphalt containers, all stored outside the Service Garage, exposed to the elements. The leakage that has already occurred must be cleaned up and the area remediated.

- Failure to prevent the discharge of leachate, sediment and oil sheen pollutants to the stormwater inlet at the back of the service yard.
- Failure to implement an inspection and maintenance program for dump trucks to prevent leachate from entering the MS4.
- Failure to identify the contents of all drums located at the Service yard and to provide containment for these drums.
- Failure to provide spill kits at fueling areas.

The MS4 permit does not authorize the city to discharge leachate or wastewater, thus controls for these unauthorized discharges must be implemented immediately. Further, measures must be taken to minimize the potential for discharges of pollutants to the MS4. Implementing practices such as secondary containment, inlet protection, lidded dumpsters and capping floor drains achieves this goal. Please review the comments within the attached *Municipal Storm Water Program Evaluation and Maintenance Facility Field Inspection Worksheets* regarding these operations.

**Deficiencies:**

- A storm water pollution prevention plan (SWP3) has not yet been developed for the Service Garage (Front and Rear). Per Part III.B.6.c of the NPDES permit, these plans must be developed and implemented by **June 2011**. The SWP3s for these facilities should include a checklist by which to conduct the inspections. This will standardize inspections and remind inspectors of the critical areas that must be reviewed during an inspection. Ohio EPA's inspection of this facility revealed several deficiencies in storm water BMP implementation. For details, please refer to the Facility Inspection Worksheet for this site.
- The SWP3 for the municipal facility subject to this program must provide a storm water contact or pollution prevention team. At a minimum, we recommend that a storm water contact be designated for the Front and Rear Service Garage that will have the authority and knowledge to ensure implementation of the SWP3 associated with this facility. 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 that was due April 1, 2010.
- The City does not appear to track the total amount of street sweepings and catch basin cleanings removed from the MS4. Please be sure to track these amounts, if you have not yet begun to do so, as it is required to be reported on the new Annual Report form. In addition, the City needs to track salt usage, catch basin cleaning, and street sweeping on a January-to-December calendar basis rather than a seasonal total as stated in Part IV.C of the Small MS4 NPDES Permit #OHQ000002 for reporting with the new Annual Report form.

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- The City did not provide me with a copy of a pesticide, herbicide and fertilizer application plan. The development of a formal application plan is an important tool in minimizing the application of these storm water pollutants. Please provide me with an application plan.
- The City has not provided any storm water pollution prevention guidance materials to field staff that they can take out with them in the field. By making materials available to staff at the field level, implementation of storm water BMPs should improve.
- 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 leaf collection, herbicide, pesticide and fertilizer application and mulching services, as well as road maintenance activities and waste disposal. Further, we recommend periodic inspection of their operations to assure that they are implementing BMPs.

Please review my comments and provide me with a letter of response indicating the actions you will take to address my concerns and the time frame in which you plan to implement your corrections. **Your response should be received no later than August 10, 2010.** Please note that this response does not replace the requirement to submit an Annual Report. Your annual report for 2010 will be due on April 1, 2011.

If you have any questions, please contact me at (330) 963-1164 or via e-mail at [lindsie.macpherson@epa.state.oh.us](mailto:lindsie.macpherson@epa.state.oh.us).

Sincerely,



Lindsie MacPherson  
Assistant to the District Engineer  
Division of Surface Water

LM/mt

cc: Thomas Lenahan, Fairview Park, Development Office  
James B. Maat, Fairview Park, Service Foreman  
Dane Tussel, CCBH  
Clarissa Gereby, Ohio EPA, DSIWM, NEDO

ec: Dan Bogoevski, Ohio EPA, DSW, NEDO

## Municipal Storm Water Program Evaluation MS4 Maintenance Component Worksheet

<b>Date of Evaluation</b>	June 29, 2010
<b>Evaluator Name, Title</b>	Lindsie MacPherson, DSW, NEDO
<b>MS4 Permittee</b>	City of Fairview Park

**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.

<b>Staff Interviewed</b>		
Name	Department/Agency	Phone Number/Email
James M. Kennedy Director of Public Service and Development	City of Fairview Park	440.356.4412 dirofservice@fairviewpark.org
Tom Leaham Development, Grants & Property Maintenance	City of Fairview Park	440.356.4449 development@fairviewpark.org
Jim Maat Service Foreman	City of Fairview Park	440.356.4410 jim.maat@fairviewpark.org

<b>MS4 Mapping</b>		
Interview Questions	Response	
Outfalls and receiving waters mapped? (61 total) Catch basins? Pipes, ditches, other conduits?	<b>YES</b> <b>YES</b> - separate map <b>YES</b> - ditches are not mapped (separate map) <b>NO</b> <b>NO</b>	
Public stormwater facilities (BMPs)? Private stormwater facilities (BMPs)?	<b>NO</b> <b>NO</b>	
How maps are used (i.e. tracking illicit discharges)?	The City uses the map to locate and track illicit discharges. The map is used as an identifier when the City is tipped off by the Cuyahoga County Board of Health about any illicit discharges found at City outfalls.	
<b>Applicable Documents</b>	<b>Reviewed</b>	<b>Obtained</b>
Map(s) of MS4 system	YES	NO

## Notes

### **MS4 Mapping**

The City of Fairview Park entered into a MOU with the Cuyahoga County Board of Health to map the City's outfalls and all surface waters to receive outfall discharges. The Storm Sewer Map is reviewed annually as part of the City's contract with the CCBH. This map was reviewed during the interview but a copy was not collected because it is the basic CCBH outfall map. The City has a contract with Mackay Engineering and Surveying that covers the mapping of MS4 details required for the second term of the NPDES permit. *Please be sure to contact Mackay Engineering to be sure the firm is aware of the mapping obligations the City is under.*

To meet the mapping obligations of NPDES Permit #OHQ000002, i.e., the MS4 permit in effect from 2009-2014, the map must show **catch basins** and **publicly-owned storm sewers, ditches, conduits**, and storm water management facilities (including **publicly-owned post-construction BMPs and underground retention**). 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.

Every catch basin in Fairview Park has been mapped by hand on a separate map. The City has installed restrictors in most of the catch basins throughout the City and has tracked this through the hand drawn map. The restrictors have reduced a lot of the stormwater from entering basements in the southwest ward of the City that drains to Cold Creek. This map may be a beneficial device to send to Mackay Engineering to help the firm compile the City's MS4 mapping into one map. The City also has an old storm sewer map that shows size and type of piping along with the City's drainage. The map is out-of-date but may still be a beneficial tool for Mackay to complete the City's MS4 mapping.

### **Identifying the Location of Discharging Home Sewage Treatment Systems (HSTS)**

There is one HSTS in the City of Fairview Park, Rivercliff Drive, and it is inspected by the CCBH as part of their annual contract. Please be aware that these discharging systems are considered illicit discharges to the MS4. Permit #OHQ000002 requires the City to work with the CCBH to determine which of these systems are not operating as designed and intended. For systems not operating as designed and intended, the CCBH must use the provisions in Ohio Revised Code 6117.51 to require connection to the sanitary sewer system where it is legal, feasible and economical to do so. For systems that cannot be eliminated through connection to sanitary sewers or the installation of a soil absorption system, the property owner must be notified to contact Ohio EPA and pursue coverage under an appropriate NPDES permit.

### **Illicit Discharge Detection**

The City has passed the Illicit Discharge and Illegal Connection Control ordinance (Chapter 1338) back in 2008. This ordinance allows the City to use enforcement when eliminating illicit discharges. Part of the contract with the CCBH is to perform sampling, source tracking and dry weather screening for the City of Fairview Park. An annual report is sent to the City along with the locations of illicit discharges. This information is then used to prioritize the City's illicit discharge elimination program. The last annual report from the CCBH indicated 6 outfalls with illicit discharges in 2009. One has been eliminated, 2 were delegated to the Metro Parks, and the other three are still in the process of being eliminated.

Please be aware that the NPDES permit #OHQ000002 requires the City to perform dry weather screening at all outfalls at least once by June 2014 and that a plan should be in place to do so. *If any illicit discharges are detected during this screening, the city must develop a plan to eliminate them.* For more information on the illicit discharges from HSTSs please read Part III.B.3.e of the Ohio EPA General Storm Water NPDES Permit for small MS4s #OHQ000002 for expectations to address these sources.



## Notes

### **Catch Basin Cleaning Schedule and Disposal**

The City of Fairview Park cleans and inspects their catch basins annually. Catch basin cleanings are stockpiled at the back of the Service Garage. During the interview the City mentioned that the spoils are stockpiled at this location until the end of the season. At this point, the spoils are taken to Boyas Excavating for disposal. Some of the stockpile was still present at the time of the interview on June 29, 2010. The stockpiling of waste removed from the City's MS4 is considered open dumping of solid wastes and this is a violation of ORC 3734.03 and OAC 3745-27-05(C). Although our Division of Solid and Infectious Waste Management (DSIWM) is currently considering an exemption that would approve certain beneficial reuses of street sweepings, there is no such plan for catch basin cleanings. The stockpiling of catch basin cleanings by the City is considered open dumping. There is no containment of the pile, which allows for an illegal discharge of leachate. The City must implement a system to manage the dewatering and storage of catch basin cleanings. The area at the Service yard is not sufficiently designed to collect or otherwise prevent leachate from flowing offsite into waters of the State. To comply with environmental regulations, there should be a dewatering pit that allows leachate to go to a sanitary sewer or holding tank. Once dewatered, the material should be stored in a covered bin and disposed of properly. This violation must be corrected. A Permit-to-Install from Ohio EPA may be required for this wastewater treatment system. Refer to page 10 of the *Service Garage Maintenance Facility Inspection Worksheet* for disposal ideas.

The disposal of catch basin cleanings and street sweepings at the Boyas Construction and Demolition Debris Landfill is not an acceptable procedure for the disposal of such solid wastes. This is a violation of Part III.B.6.d.iii.3 of the NPDES permit and Ohio Revised Code 6111.04 and 6111.07. This matter was referred to the Ohio EPA Division of Solid and Infectious Waste Management (DSIWM) for follow-up.

*\*Also, the City needs to track the amount of material removed from the catch basins and MS4 and have a running tally so the total amount can be placed in the City's annual report for 2010. Please be sure to report the total per calendar year (January to December) in the annual report for 2010 as stated in Part IV.C.2 on reporting of the Ohio EPA General Storm Water NPDES Permit for small MS4s #OHQ000002.*

### **MS4 System Repair and Maintenance**

The City of Fairview Park will inspect storm drain pipes in response to a blockage event or if a problem area is identified in the City. The EPA would like to see a more proactive inspection of the storm pipes in the coming years of the new permit term to help improve your MS4 program and reduce pollutants.

### **Municipal Construction Projects**

If construction is complete or the project is no longer viable, please submit Notices of Termination (NOTs) for these projects to close out NPDES permit coverage. The NOT and instructions can be obtained on the Ohio EPA Storm Water Program webpage at [www.epa.ohio.gov/dsw/storm/stormform.aspx](http://www.epa.ohio.gov/dsw/storm/stormform.aspx). As a reminder, coverage under the Ohio EPA General Storm Water NPDES Permit for Construction Activities is to be terminated within 45 days of when the project reaches final stabilization. Please be sure to incorporate this requirement into your procedures on all future projects.

<b>Stormwater Management Facilities Operation and Maintenance</b>			
<b>Interview Questions</b>	<b>Response</b>		
Public facilities inspected?  Frequency:	NO  The Gemini Center is the only retention that is publically owned. It is under ground and at this time no inspections have been completed.		
Private facilities inspected?  Frequency:	NO  There are about 2 to 3 underground retention devices in the City. None have been inspected in the last year.		
Checklist used for inspections?	NO		
Have maintenance standards and procedures been established for these facilities?	YES  The City of Fairview Park has adopted the <b>Rainwater and Land Development manual</b> for their standards and procedures.		
How is maintenance prioritized? Is data evaluated to target maintenance resources?	NO  The City does not maintain any of the above facilities.		
	<b>Applicable Documents</b>	<b>Reviewed</b>	<b>Obtained</b>
	Inspection checklist	NO	NO

<b>Notes</b>
<p><b><u>Maintenance Program for Public Storm Water Infrastructure</u></b></p> <p>Part III.B.6.d.iii.1 of the NPDES permit requires the City of Fairview Park to establish maintenance schedules, maintenance activities and long-term inspection procedures to reduce the discharge of floatables and other pollutants from the MS4. The City does not actively inspect public storm water infrastructure, but does perform certain maintenance activities associated with the retention unit it owns at the Gemini Center. In order to comply with this section of the NPDES permit, the City must expand upon these activities and formalize their requirements by adopting or establishing standard operating procedures for stormwater infrastructure, including regular inspection. Ohio EPA recommends the City adopt or create a checklist by which to conduct these inspections to standardize inspection procedures amongst inspectors. Regular inspections will help you prioritize maintenance activities. Information to improve your program is available at <a href="http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm?action=min_measure&amp;min_measure_id=6">http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm?action=min_measure&amp;min_measure_id=6</a>.</p> <p><b><u>Long-Term Maintenance of Post-Construction BMPs</u></b></p> <p>Part III.B.5.d of the NPDES permit requires the City to develop a program to ensure long-term maintenance of post-construction BMPs. This program must encompass all public and privately-owned post-construction water quality practices installed since April 21, 2003. Post-construction water quality practices are 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). They can also include non-structural BMPs such as riparian setback areas or conservation easements. An acceptable</p>

long-term maintenance program for post-construction BMPs consists of:

1. Ensuring that the SWP3 includes a long-term maintenance plan for all post-construction BMPs. The plan should identify the party responsible to conduct maintenance, the routine and non-routine maintenance activities for each practice with schedule, a blank inspection checklist for each practice, a site map showing the location of the practice(s) and the easements or agreements for access.
2. Periodically inspecting or otherwise verifying that the post-construction BMP is being maintained in a functional condition per the long-term maintenance plan, and
3. Taking enforcement action against the responsible party if they fail to maintain the BMP as required

The City has not yet developed the robust long-term maintenance program for post-construction BMPs, which is a violation under Part III.B.5 of NPDES Permit #OHQ000002. Information on developing a long-term maintenance program for post-construction BMPs can be found in the Center for Watershed Protection document titled ***Managing Storm Water in Your Community: A Guide for Building an Effective Post-Construction Program*** downloadable at

[http://www.cwp.org/index.php?option=com\\_docman&task=cat\\_view&gid=76&Itemid=118](http://www.cwp.org/index.php?option=com_docman&task=cat_view&gid=76&Itemid=118).

(\*\*Tool 6: Plan Review, BMP Construction, and Maintenance Checklists) This resource includes inspection checklists to ensure the proper construction of post-construction BMPs as well as their long-term maintenance.

As a reminder, Ohio EPA has required a long-term maintenance plan for all post-construction BMPs since April 21, 2003. Although it must be a stand-alone document, it is part and parcel of the Storm Water Pollution Prevention Plan (SWP3) required by the Ohio EPA General Storm Water NPDES Permit for Construction Activities. The goal of the MS4 program is to develop a local review and approval program for the SWP3. *This includes post-construction BMPs and their long-term maintenance plans.* These plans are required to provide a schedule for routine and non-routine maintenance tasks to be undertaken.

<b>Road Maintenance</b>	
<b>Interview Questions</b>	<b>Response</b>
Streets regularly swept?  Frequency:	<b>YES</b>  The City starts sweeping every spring and gets through the entire City 3 to 4 times a year. The first time the City went out this year was on March 19, 2010. They track the areas swept and the number of times the crews dump the sweeper into the trucks to be taken straight to Boyas Excavation. See Notes.  <i>Also, the City does not track total amount of debris removed from the City's streets for reporting in the annual report.</i>
Frequency based on water quality factors (e.g. proximity to streams)?	<b>NO</b>  For aesthetics the City will sweep the main roads more often.

<b>Road Maintenance</b>	
<b>Interview Questions</b>	<b>Response</b>
How are spoils disposed of?	The sweeper dumps the street sweeping spoils directly into the dump truck and the material is taken off site to Boyas Excavating. See Notes.
Does the community collect road kill?  What do they do with the carcasses?	<b>YES</b>  The City has a crew member that will go and collect the carcasses and dispose of them into a dumpster at the back of the facility which is picked up by Republic Waste.
Does the community have a leaf collection program?  What do they do with the collected leaves?  <b>NOTE:</b> Landfills have been banned from accepting yard waste, so MS4 cannot place leaves and yard waste in dumpster. Must be composted at a licensed Class IV composting facility. Communities may temporarily store leaves awaiting transport to a composting facility but leafate must be prevented from discharging.	<b>YES</b>  The City usually starts the pick-up of leaves in October and ends when the leaves have stopped falling. There is a schedule that the City will try to stick to, weather permitting. They own 3 vactors and then another truck will follow to store the leaves. The leaves are taken to Morton's Landscaping. The City keeps track of all the loads collected daily and sends the truck directly to Morton's. Some leaves are kept at the Service garage for small composting operation. See Notes.
BMPs used during road maintenance activities?  Describe types of road maintenance conducted by community staff and the BMPs used:  Chuck hole patching, water leak repairs, cold patching, curb replacement, sidewalk repair, and paint striping.	<b>NO</b>  No BMPs are implemented at this time. The crews do not conduct road striping if there is even a threat of rain, but there are no specific practices that have been adopted by the City to protect inlets during road maintenance activities, etc.
BMP guidance available to field staff?	<b>YES</b>  The City provides training to its service staff on Pollution Prevention and Good Housekeeping. No posters or field books are provided to the staff. The City should consider using the Storm Water Pollution Prevention: Best Management Practices Guidebook from Excal Visual and creating some kind of guidance to hand out to staffs.
Deicers used by MS4?	<b>YES</b>  The City uses road salt and adds Calcium Chloride to salt when needed. CaCl is used in

<b>Road Maintenance</b>			
<b>Interview Questions</b>	<b>Response</b>		
	cold weather conditions and is either directly sprayed onto the salt or sprayed during application.		
Type and amount of deicer and additives tracked?  What measures are being taken to minimize the application of deicers?	<p><b>YES</b></p> <p>All deicers and additives are tracked. Clip boards are kept in the trucks to track the number of loads taken out per storm event (driver, date, loads used, and buckets of salt and when CaCl is used). This process began in 2009 to track the City's salt usage for review to help minimizing application.</p> <p>The City of Fairview does not salt side streets; they calibrate the spreaders for less salt usage, and control the frequency of salting. The problem comes in training the men to start following these sensible salting practices.</p>		
Sand/salt swept up after application?  How soon?	<p><b>YES</b></p> <p>The City stores their salt in a salt dome and the CaCl is stored in a tank behind the rear garage. The salt dome is sand bagged after the winter season or during dry spells to prevent runoff. The spillage from loading is swept back into the dome after each storm event.</p>		
Does your community operate a snow stockpile yard to store snow that has been removed from community streets and parking lots?  If YES, location of the yards:  Has your community considered implementing best management practices to control the discharge of pollutants from snowmelt associated with snow storage yards?  If YES, what BMPs have you implemented?	<p><b>YES</b></p> <p>The City has taken snow to a parking lot in Bolhken Park. Once the snow melts the City sends the sweeper out in the Spring to sweep the lot.</p> <p><b>YES</b></p> <p>Location has no catch basin on the lot and there are no streams or rivers nearby.</p>		
	<b>Applicable Documents</b>	<b>Reviewed</b>	<b>Obtained</b>
	BMP guidance	<b>YES</b>	<b>YES</b>
	Street sweeping records	<b>YES</b>	<b>YES</b>
	Deicer application records	<b>YES</b>	<b>YES</b>

## Notes

### **Street Sweeping**

As stated above for catch basin cleaning debris, the disposal of catch basin cleanings and street sweepings at the Boyas Construction and Demolition Debris Landfill is not an acceptable procedure for the disposal of such solid wastes. This is a violation of Part III.B.6.d.iii.3 of the NPDES permit and Ohio Revised Code 6111.04 and 6111.07. This matter will be referred to the Ohio EPA Division of Solid and Infectious Waste Management (DSIWM) for follow-up.

*\*Also, the City needs to track the amount of material removed from the City's streets and have a running tally so the total amount can be placed in the City's annual report for 2010. Please be sure to report the total per calendar year (January to December) in the annual report for 2010 as stated in Part IV.C.2 on reporting of the Ohio EPA General Storm Water NPDES Permit for small MS4s #OHQ000002.*

### **Leaf Collection and Composting**

Through inspection of the Rear Service Garage and Yard it was revealed that the leaves stored on this property are producing leachate. The composting leaves are stored at the back of the yard near the edge of the property. There are no controls to prevent the discharge of leachate to waters of the state or the MS4. The Ohio EPA recommends the City establish berms around leaf storage areas to contain any leachate that is produced. Leachate can be recycled onto windrows to aid in the composting process. If leachate must be disposed, it must be treated as waste water.

Further, the City of Fairview Park has not obtained a Class IV compost license from the CCBH to operate a composting operation. This matter was referred to Clarissa Gereby of our Division of Solid and Infectious Waste Management and to the CCBH for follow-up. The City indicated that compost is distributed to residents when requested. If the City does not wish to continue composting, the area needs to be cleaned up and all composting leaves must be removed and the leachate collected and disposed of properly. In the future, if the City wishes to continue this composting operation, the City must obtain a Class IV composting operation license from the CCBH.

### **Road Maintenance**

The City does not appear to have incorporated the use of storm water BMPs during road maintenance activities. A possible BMP includes the use of storm drain inlet protection to keep sediment out of the storm sewer system when saw cutting for curb replacements. The NPDES permit requires road maintenance crews and third-party contractors that conduct road maintenance on your behalf to implement storm water pollution prevention practices at the work site. Road maintenance crews should be trained in all sediment and erosion controls and controls for other wastes that are commonly implemented at construction sites.

### **Deicer Usage**

More accurately tracking road salt usage is one BMP that can help reduce the use of deicers. By tracking this information more closely, you may spot abnormalities in salt usage that can indicate when equipment maintenance is needed, when staff may not be following salt application guidelines and when inventory loss occurs. Other practices that can reduce the use of road salt include regular calibration of salt spreaders and developing a deicer application policy that identifies the level of service to be provided, where "bare pavement" is desired, how quickly streets are to be cleared, what percentage of streets are to get priority and in what areas snow may be hauled away. Priority can be assigned based on the number of vehicles per day, traffic patterns, accident records, school zones, and commercial and industrial areas. Ohio EPA urges you to adopt the sensible salting policies recommended by the Cuyahoga County Engineer or the Salt Institute. A wealth of information is available at [www.saltinsitute.org](http://www.saltinsitute.org) on how to reduce pollution from road deicing activities.

Notes
Finally, be aware that the Annual Report requires information to be reported on a January to December calendar year basis. This may require you to adjust how you summarize salt usage data, as most communities have typically been tracking usage on a winter season basis.

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?	YES		
	Chapter 1336 Soil Erosion and Sediment Control and Post Construction Water Quality Runoff Ordinance.		
Applicable Documents		Reviewed	Obtained
Inventory		NO	NO

Notes
<p><b>Inventory</b></p> <p>An inventory of public/private-owned stormwater management facilities built since April 21, 2003 is part of the new mapping requirements of NPDES permit #OHQ000002. This inventory must be completed by the end of your next permit term, i.e., June 2014.</p>
<p><b>Stormwater Retrofit:</b></p> <p>The City's public stormwater management facilities should be looked at for possible retrofit opportunities so that they treat the Water Quality Volume (WQv). The current MS4 permit (OHQ000002) does not require the City to implement retrofit projects, but they are an important piece of the storm water management puzzle for older, developed parts of the community. Current post-construction requirements only affect areas where new development or redevelopment disturbs 1 or more acre of land. This program will not create BMPs in previously-developed areas unless they are being redeveloped and the 1-acre threshold is met. As such, US EPA is evaluating whether retrofits should be required in future generations of the MS4 permit. As the City of Fairview Park is largely built-out, this limits the opportunities to implement post-construction BMPs as part of the development/redevelopment process.</p> <p>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. Typically, retrofitting the outlet structures of existing detention and retention basins to provide extended detention of the WQv is the easiest and most feasible type of retrofit project. However, preferred retrofit projects include <b>installing bioretention cells in existing parking lots or along residential streets, resurfacing with permeable pavement and establishing incentive program for rain gardens, rain barrels and other forms of downspout disconnection in residential neighborhoods.</b></p>

Facilities Operation & Maintenance													
Interview Questions	Response												
Inventory of MS4 facilities complete (i.e. facilities owned and operated by the MS4)?	YES												
	City Hall Garage, Gas pumps, Service Yard Complex, Salt storage												
<b>Types of facilities included</b>													
<i>These need their own NPDES storm water permit for industrial activities, if there is a discharge of runoff from these operations:</i>													
<ul style="list-style-type: none"> <li>• Landfills Type</li> <li>• Airports</li> <li>• Shipping Ports or Marinas</li> <li>• Steam Electric Power Plants</li> <li>• Wastewater Treatment Plants <math>\geq</math> 1 MGD or with a pretreatment program</li> </ul>	<table border="1"> <thead> <tr> <th><u>Response</u></th> <th><u>SWP3 Developed?</u></th> </tr> </thead> <tbody> <tr> <td>NO</td> <td>N/A since do not operate</td> </tr> </tbody> </table>	<u>Response</u>	<u>SWP3 Developed?</u>	NO	N/A since do not operate								
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	<p><b>NOTE:</b> No permit or SWP3 required if facility has no exposure. However, even if a No Exposure Certification has been submitted for the facility, inspect to verify validity.</p>												
<i>These do not need their own permit, but do have to develop an SWP3 unless noted as N/A:</i>													
<ul style="list-style-type: none"> <li>• Impound Lots – towed to Baker Vehicles in Lakewood</li> </ul>	NO	N/A since do not operate											
<ul style="list-style-type: none"> <li>• Leaf Collection Yards <ul style="list-style-type: none"> <li>✓ No discharge of leafate permitted</li> </ul> </li> </ul>	NO	N/A since do not operate											
<ul style="list-style-type: none"> <li>• Maintenance Yards <ul style="list-style-type: none"> <li>➢ How many do they operate? 1</li> <li>➢ List facility names/locations:</li> </ul> <p style="margin-left: 40px;"> <b>Service Garage (Front and Rear)</b>  <b>20777 Lorain Road</b>  <b>Fairview Park</b> </p> </li> </ul>	YES	NO											
<ul style="list-style-type: none"> <li>• Composting Operations <ul style="list-style-type: none"> <li>✓ No discharge of leachate permitted</li> </ul> </li> </ul>	YES	*Included at Service Garage											
<ul style="list-style-type: none"> <li>• Solid Waste Transfer Stations or Operations</li> </ul>	NO	N/A since do not operate											



<b>Facilities Operation &amp; Maintenance</b>	
<b>Interview Questions</b>	<b>Response</b>
Is there a designated stormwater contact person for each facility?	Undecided at this time
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?	Employees are unionized. Must follow disciplinary procedures in the contract. First offense is a verbal warning, then a written notice and finally termination.
Parking lots owned/operated by the permittee swept?  Frequency?	<b>YES</b>  Parking lots are swept on an as needed basis.
Do you have any combined sewer systems?  If yes, do you have any combined sewer overflows?  Are you aware of any illicit cross connections between your sanitary sewer and MS4?  If so, what is your plan to eliminate this illicit discharge?	<b>YES</b>  3 streets (Belvidere, Stanford, and Northwood) have combined sewers that are inspected every couple months.  <b>NO</b>  <b>NO</b>  House connections over the years are dug up and corrected immediately. Dye testing and smoke testing has not noted any cross connections.
Have you investigated the extent of infiltration and inflow into storm sewer system?  What methods have been used to conduct this investigation?  What are your plans to repair and eliminate this source of illicit discharge?	<b>NO</b>  There is no proactive program at this time. The CCBH dry-weather screening has greatly helped with the City's program for eliminating illicit discharges.  There is no comprehensive program to determine the extent of inflow and infiltration (I/I) to the MS4 and to eliminate those sources that would be considered illicit discharges. Please be sure that you are not overlooking a possible source of illicit discharge to the MS4. Your IDDE program should include a proactive I/I program.
Sewer spill and cleanup procedures in place?	<b>NO</b>  There is no plan in place at this time. Any procedures are just by mouth, not written. The fire department has a Hazardous material response team. <b>Consider combining programs.</b>

Facilities Operation & Maintenance			
Interview Questions		Response	
Applicable Documents		Reviewed	Obtained
Facility inventory		YES	YES
Facility SWPPP		NO	NO

Notes
<p><b>Storm Water Pollution Prevention Plans (SWP3s)</b>  A Storm Water Pollution Prevention Plan (SWP3) must be developed and implemented for the following facilities:</p> <p><b>Service Garage (Front and Rear)</b>  <b>20777 Lorain Road</b>  <b>Fairview Park</b></p> <p>The Ohio EPA General Storm Water NPDES Permit for Small MS4s #OHQ000002 requires the City of Fairview Park to develop and begin implementing the SWP3 for the above facility within 2 years of permit renewal, i.e., by <b>June 2011</b>.</p> <p>The above facility must be inspected at a frequency specified in the SWP3. Ohio EPA recommends that facilities be inspected monthly. A comprehensive site evaluation must be conducted at least once per year and a record of that 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. The SWP3 should contain a checklist to provide consistency to facility inspections. The SWP3 should also identify who is responsible for facility inspections as well as a storm water contact person for the facility. Please reference Ohio EPA General Storm Water NPDES Permit for Industrial Activities #OHR000004 <b>Part IV. D.2.a.1</b> for more information on the development of a <b>site map</b> for the SWP3s. Also refer to the following website for information on developing SWP3s for these facilities:  Developing your SWP3: <a href="http://www.epa.gov/npdes/pubs/industrial_swppp_guide.pdf">http://www.epa.gov/npdes/pubs/industrial_swppp_guide.pdf</a></p>

Pesticides, Herbicides & Fertilizers	
Interview Questions	Response
Certified applicators used?	YES  All pesticide, herbicide, and fertilizer application is contracted with a private contractor Weed Pro.
Integrated Pest Management (IPM) practices used?	NO
Storage location of pesticides, herbicides, and fertilizers:	N/A
BMPs used during application:	N/A
Fertilizer/pesticide application plan utilized?	NO  See Notes

<b>Applicable Documents</b>	<b>Reviewed</b>	<b>Obtained</b>
Fertilizer/pesticide application plan	NO	NO

<b>Notes</b>
<p><b>Fertilizer/Pesticide Application Plan</b></p> <p>The City does not have a documented pesticide, herbicide and fertilizer application plan. Even though these activities are contracted out, the City should still have a plan for the locations of application and how much is applied during what times. The application records should keep track of the name of the substance being applied and the type of chemical, amount used and time the material is being applied as well as who the applicator was. Since a contractor is being used, the City needs to include language into the contract that requires the contractor to consider pollution controls where the activities undertaken are a potential source of storm water pollution.</p> <p>Please provide me with a copy of the City's pesticide, herbicide and fertilizer application plan.</p> <p><b>BMPs for Pesticide, Herbicide and Fertilizer Application</b></p> <p>Pesticides, herbicides and fertilizers should not be applied when the forecast calls for rain. The label of most products will provide guidance on when and how much of these materials should be applied. Do not exceed manufacturers' recommendations. In addition, crews must be trained to avoid overspray and to implement dry clean-up methods should spills occur. Under no circumstance should crews hose spilled materials into storm drains. Storm drains near application areas can be temporarily covered to prevent overspray or spills from entering the MS4. The usage of fertilizers can also be reduced by replacing typical lawn-type grasses with natural, slow-growing grass species that require less or no fertilizers to be sustained. The City of Cleveland is using this method to revegetate neighborhoods where blighted homes have been razed. This will reduce costs to the City to maintain this new greenspace.</p> <p>Integrated Pest Management (IPM) is an effective and environmentally sensitive approach to pest management that relies on a combination of common-sense practices. IPM programs use current, comprehensive information on the life cycles of pests and their interaction with the environment. This information, in combination with available pest control methods, is used to manage pest damage by the most economical means, and with the least possible hazard to people, property, and the environment. For further information, please refer to <a href="http://www.epa.gov/pesticides/factsheets/ipm.htm">http://www.epa.gov/pesticides/factsheets/ipm.htm</a>.</p>

<b>Standards, BMPs, &amp; Outreach</b>	
<b>Interview Questions</b>	<b>Response</b>
BMP technical guidance document available to maintenance staff?	<p><b>YES</b></p> <p>The City provides training to its service staff on Pollution Prevention and Good Housekeeping. No posters or field books are provided to the staff.</p>
MS4 use contractual staff to complete MS4 maintenance activities?	<p><b>YES</b></p> <p>The City of Fairview Park contracts out pesticide, herbicide, and fertilizer application, road maintenance activities, sewer work, street stripping, etc.</p>

<b>Standards, BMPs, &amp; Outreach</b>		
<b>Interview Questions</b>	<b>Response</b>	
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, i.e. public spaces):	Pet waste: No dogs allowed in parks  <u>Litter reduction:</u> CC Court Community Service will come through Fairview Park to clean up litter and the litter is placed in the dumpster.	
<b>Applicable Documents</b>	<b>Reviewed</b>	<b>Obtained</b>
BMP manual or guidance document	YES	YES
Contract language for MS4 operation and maintenance activities	NO	NO

<b>Notes</b>
<p><b>Technical Guidance and Specifications for Maintenance Staff</b></p> <p>The City needs to improve the dissemination of technical guidance to its maintenance staff on storm water pollution prevention matters. The City should look for posters that can be hung in work areas or lunchrooms, or guidebooks that can be taken out into the field with maintenance crews. An example poster developed by the Lake County (OH) Stormwater Management Department was given to Jim Maat at the time of the interview. This will help reinforce employee training.</p> <p>Once it is prepared, the City will need to train staff on the SWP3 for the Service Garage (Front and Rear) and should look to adopt standards and specifications for storm water pollution prevention implementation in all its municipal operations with the potential to release pollutants in storm water runoff (e.g., prohibiting the Fire Department from washing vehicles outside). Existing guidance manuals you may find useful to meet this goal include the <b><i>Rainwater and Land Development</i></b> manual (ODNR, 2006) and the <b><i>Municipal Pollution Prevention/Good Housekeeping Manual #9</i></b> (Center for Watershed Protection, September 2008). This manual is available as a free download on their website at <a href="http://www.cwp.org/formmaker/Download-Form_RedirectFormPage.html">http://www.cwp.org/formmaker/Download-Form_RedirectFormPage.html</a>.</p> <p><b>Contracted Staff</b></p> <p>The City of Fairview Park contracts out pesticide, herbicide, and fertilizer application, road maintenance activities, sewer work, street stripping, etc. Please be sure to include language requiring pollution controls in all contracts and requests for proposal (RFPs) where the activities are a potential source of storm water pollution. The operations of third party service providers should be reviewed periodically by the City to ensure that the required pollution controls are being implemented.</p> <p><b>Public Education and Outreach</b></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 at least 5 public involvement opportunities over the permit term. Certain activities, such as stream clean-ups or storm drain stenciling projects with local boy scout troops, can count toward both requirements because they involve the public as well as educate them on storm water pollution issues.</p>

<b>Staff Education and Training</b>			
<b>Interview Questions</b>		<b>Response</b>	
Staff trained to identify potential storm water pollution sources which would result in an illicit discharge?  Frequency:		YES  Service Department staffs trained in 2009 CCBH PPGH for Municipal Operations training 6/10/2008 and 10/8/2008 Attend Northeast Ohio Stormwater Conferences	
Materials used to train staff:		The Board of Health materials have been used to train crews. 2010 will be the fourth year the City has used CCBH to train maintenance staffs.	
<b>Applicable Documents</b>		<b>Reviewed</b>	<b>Obtained</b>
Training materials		YES	YES

<b>Notes</b>
<p><b>MS4 Staff Training</b></p> <p>The first generation of the MS4 permit required the City to develop an employee training program to prevent and reduce storm water pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances and storm water system maintenance.</p> <p><i>Please note that NPDES permit #OHQ000002 requires the City to conduct at least one employee training event on these topics per year. If key management staff attends a storm water education event, it is expected that the information learned will be shared with the appropriate staff so that they can conduct their job duties without causing storm water pollution. The City should also look to incorporate training on storm water pollution prevention in any new employee training program that may exist if that employee's job duties have the potential to create storm water pollution or include illicit discharge identification and elimination.</i></p> <p>For training that the City organizes for its staff, please retain: (1) the agenda for the training session, including the date that training was provided and names/organizations of the speakers, (2) an attendance list with the signatures of attendees and (3) one copy of the materials used for training. For outside training attended, include an agenda (if available) or a list of topics, the names of attendees, date attended and a copy of any attendance certificate issued by the training organization.</p> <p>The following materials may help with developing a training program:</p> <p>Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) has provided a number of training opportunities on pollution prevention and good housekeeping for municipal operations over the past several years. Materials presented at OCAPP's session are archived on the internet at: <a href="http://epa.ohio.gov/ocapp/storm_water.aspx">http://epa.ohio.gov/ocapp/storm_water.aspx</a> and can be used to provide training to your staff. Future training events involving Ohio EPA are listed on this site as well.</p> <p>ODOT's Local Technical Assistance Program (LTAP) maintains a library of training videos, including videos on storm water pollution prevention that can be borrowed at no cost.</p> <p>US EPA has 2 to 3 webcasts per minimum control measure that can be viewed at any time over the internet at <a href="http://www.epa.gov/npdes/training">www.epa.gov/npdes/training</a>.</p>

**Notes**

The Center for Watershed Protection also has information available for training in their Manual #9: Municipal Pollution Prevention/Good Housekeeping Practices.

The Lake County (OH) Stormwater Management Department has developed a series of Toolbox Talks that can be used during staff meetings to train maintenance staff on a single storm water pollution prevention topic at a time. This tool is intended to provide training by eliciting discussion amongst the staff and can be completed in less than 15 minutes per topic. Please contact Tim Miller, Director of the LCSMD at (440) 350-5900 for further information.

# FIELD INSPECTION WORKSHEET

## MS4 SWMP Evaluation

### MS4 Maintenance Facility Field Inspection Worksheet

<b>Permittee:</b> The City of Fairview Park Service Garages (Front and Rear)	
<b>Address of facility:</b> 20777 Lorain Road, Fairview Park 44126	<b>Size of facility:</b>
<b>Date of visit:</b> 6/29/2010	<b>Time of visit:</b> 1:00 p.m.
<b>Provide the name(s) and title(s) of permittee staff present during inspection</b>	
<b>Name</b>	<b>Title</b>
<i>Jim Maat</i>	<i>Service Foreman</i>
<b>Evaluator Observations:</b>	
<b>SWPPP or stormwater plan</b>	
Has the maintenance facility developed a SWPPP or stormwater plan?	<b>NO.</b> The City is required to develop a SWP3 for this facility similar to that of an Industrial SWP3. See Interview sheet for more information on this matter.
Does the plan include a site map, list of pollutant sources, BMPs, and maintenance procedures?	These are key components of the SWP3 and must be included in the document when it is produced.
Does the permittee conduct and document periodic inspections of the facility?	<b>NO.</b> The facility must be inspected for the implementation of storm water best management practices (BMPs) at a frequency specified in the SWP3. Ohio EPA recommends that the facility be inspected once per month. In addition, you must conduct a Comprehensive Site Evaluation annually.
Are storm drains labeled and free of debris?	Some drains have been labeled. The City needs provide more adequate protection for the catch basin at the back of the facility. See Notes.
<b>Vehicle maintenance, fueling and washing</b>	
Are vehicle maintenance activities conducted in a designated place not exposed to stormwater?	<p>YES. However, all vehicle maintenance occurs inside the rear garage where the floor drains are connected to storm. <i>The City should consider capping any of the drains that are not necessary for the drainage of the building.</i> The floor drains that are necessary have a screen installed in them to capture any large materials and solids from entering the storm sewer. These screens are cleaned out at least once a month.</p> <p><b><i>The City really needs to consider redirecting these floor drains near vehicle maintenance and washing activity and material storage to sanitary.</i></b></p> <p>Vehicles are stored outside on the east side of the building. These vehicles need to be inspected for leaks regularly to ensure fluids do not reach the City's MS4. The sweeper is stored in the front garage next to a floor drain connected to storm. <i>This drain should be covered as a BMP for this facility.</i></p>

<p>Are fueling stations properly designed with spill kits nearby?</p>	<p>The City needs to place a spill kit next to the fueling station and clearly label the emergency shot off button. The City should consider covering the storm drain near the pump when refilling the fuel storage tanks.</p>
<p>Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer?</p>	<p>YES but the City washes vehicles inside the rear garage where the floor drains are connected to storm as well as outside behind the rear garage where there is exposure to the MS4. This practice must be stopped. You must establish an indoor wash bay with connection to the sanitary sewer system, take vehicles to a commercial car wash, or temporarily plug storm drains to allow you to collect wash-water for disposal at POTW.</p>
<p><b>Material storage</b></p>	
<p>Are all materials that are potential stormwater contaminants stored under cover or in secondary containment?</p>	<p>Drums should be stored indoors or under a roofed area with secondary containment. The drums stored outside the rear garage need to have caps and stored in secondary containment to avoid leakage into the MS4.</p> <p>The City sand bagged the opening of the salt dome to prevent salt residue from entering the MS4. Make sure all salt is swept back into the dome to avoid contact with stormwater runoff.</p> <p>The City stockpiles catch basin cleanings at the back of the maintenance yard until the pile is ready to be hulled to Boyas Excavating. This qualifies as open dumping of solid waste. There are no controls in place to prevent the discharge of leachate from these piles into the MS4 and directly into the Metroparks behind the facility. See Notes.</p> <p>It appears that the City of Fairview Park runs a small composting operation at the back of the maintenance yard. There were no controls in place to prevent the discharge of leachate from the operation. See Notes</p> <p>Unused barrels and barrels that contain unknown materials need to be tested and disposed of properly. See Notes.</p> <p>Review the items stored throughout the maintenance yard, e.g., scrap metal, tires, old equipment, barrels, piping and scrap out what you can so as to avoid accumulating potential storm water pollutant sources.</p>

	Tires need to be moved inside to the storage building or tarped until ready for pick-up.
<b>Hazardous waste management</b>	
Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff?	<p>The used oil drum outside the rear garage needs to be labeled "Used Oil." The tank sits within secondary containment but is outside. The drain plug was in place in the dike. The SWP3 for this facility must include procedures for evaluating the runoff that accumulates within the dike before it is discharged. Oil sheens must be removed with absorbent pads or other such materials before this runoff can be discharged to the MS4.</p> <p>A damaged barrel of white paint was found on its side leaking a large sum of paint onto the service yard. This spill is exposed to the City's MS4 and needs to be cleaned up and the area remediated.</p>
<b>Waste management</b>	
Are waste bins covered with waste properly disposed in containers?	<p>All dumpsters on site need to be lidded, plugged, and inspected for leaks on a regular basis. This inspection process should be included in the sites SWP3 so the dumpsters do not leak solid waste leachate on the yard and become a storm water pollutant source.</p> <p>A dump truck was parked at the maintenance yard that was leaking some sort of solid waste leachate. Trucks should be inspected regularly for leaks of not only automotive fluids, but also leachate from solid waste and residuals still in the truck hoppers. Measures must be taken to prevent the discharge of leachate to the MS4 from this source.</p>
How is landscape waste stored?	Landscape waste is not stored on site. The waste is taken to a chipper in Westlake.
<b>Spill response</b>	
Does the facility have a spill response plan, and are spill kits readily available?	<i>A spill response plan is a required component of the SWP3.</i> The facility maintains a supply of Oil-Dri to absorb spills, but the containers are not labeled and not always located close to potential spill sites. A spill kit should be available at the fueling area and include more than just Oil-Dri, e.g., mats or booms that can block flow to storm drains.
<b>Employee training</b>	
What type of stormwater training do maintenance staffs receive?	Training on storm water pollution prevention is required for the staff at this facility.

## Notes or additional information:

### Floor Drains and Catch Basins

The City of Fairview Park Service Garages (Front and Rear) both have floor drains connected to storm. An evaluation of the facility's drainage should be completed for the SWP3, including dye testing to confirm that all the floor drains in fact connect to the storm sewer. If this is verified, the City needs to consider **redirecting the floor drains to sanitary** to keep activities such as vehicle maintenance and washing from endangering the City's MS4. All floor drains not in use should be capped or covered as a BMP to prevent pollutants from reaching the storm sewer.

The catch basin at the back of the maintenance yard receives runoff from the small composting piles and catch basin cleaning pile as well as runoff from the back half of the yard. This basin needs **more adequate inlet protection**, and *pollutants such as leachate and oils need to be prevented from entering the basin*. More information can be found on the Cuyahoga Soil and Water Conservancy District website for storm water <http://www.cuyahogawcd.org/services-stormwater.htm>, and more specifically on inlet protection at <http://www.cuyahogawcd.org/PDFs/TechNote-Storm%20Drain%20Inlet%20Protection.pdf>.

\*The City may want to consider building an earthen berm surrounding the back of the Service yard to avoid the discharge of the entire yard's storm water runoff over the edge of the property into the Metroparks.

### Catch Basin Cleanings Disposal

Catch basin cleanings are stockpiled at the back of the Service Garage. During the interview the City mentioned that the spoils are stockpiled at this location until the end of the season. At this point, the spoils are taken to Boyas Excavating for disposal. Some of the stockpile was still present at the time of the interview on June 29, 2010. The stockpiling of waste removed from the City's MS4 is considered open dumping of solid wastes and this is a violation of ORC 3734.03 and OAC 3745-27-05(C). Although our Division of Solid and Infectious Waste Management (DSIWM) is currently considering an exemption that would approve certain beneficial reuses of street sweepings, there is no such plan for catch basin cleanings. The stockpiling of catch basin cleanings by the City is considered open dumping. There is no containment of the pile, which allows for an illegal discharge of leachate. The City must implement a system to manage the dewatering and storage of catch basin cleanings. The storage area is not sufficiently designed to collect or otherwise prevent leachate from flowing offsite into waters of the State. To comply with environmental regulations, there should be a dewatering pit that allows leachate to go to a sanitary sewer or holding tank. Once dewatered, the material should be stored in a covered bin and then disposed of properly. This violation must be corrected. A Permit-to-Install from Ohio EPA may be required for this wastewater treatment system. Refer to page 10 of this evaluation for disposal ideas.

The disposal of catch basin cleanings and street sweepings at the Boyas Construction and Demolition Debris Landfill is not an acceptable procedure for the disposal of such solid wastes. This is a violation of Part III.B.6.d.iii.3 of the NPDES permit and Ohio Revised Code 6111.04 and 6111.07. This matter was referred to the Ohio EPA Division of Solid and Infectious Waste Management (DSIWM) for follow-up.

### Composting Operation

The City appears to be operating a small composting operation at the back of their maintenance yard. At this time there are no runoff controls in place for the piles and there is leachate discharging from this operation. This is a violation of Part III.B.6.d.iii.3 of the NPDES permit and Ohio Revised Code 6111.04 and 6111.07.

The City is not authorized to discharge this leachate into their MS4; therefore, the City must implement controls to prevent the discharge of leachate associated with leaf composting operations. Also, the City has failed to obtain an operating license for leaf composting activities associated with the municipal leaf collection program. This is a violation of Part V.N of the NPDES permit and ORC 6111.04 and 6111.07. Some leaves collected by the municipal leaf collection program are stockpiled and stored for significant periods of time at the Fairview Park Rear Service Garage 20777 Lorain Road. The City has not obtained a Class IV composting license from CCBH. This matter was referred to Clarissa Gereby of our Division of Solid and Infectious Waste Management and to the CCBH for follow-up. If the City does not wish to continue composting, the area needs to be cleaned up and all composting leaves must be removed and the leachate collected and disposed of properly. In the future, if the City wishes to continue this composting operation, the City must obtain a Class IV composting operation license from the CCBH.

### **Unidentified Barrel Disposal**

Many unidentified 55 gallon barrels were found throughout the maintenance yard, that the City is unsure how to handle. The City is asked to determine the contents of the containers. If the material is usable, the drums should be labeled and used as needed. If no one can tell you what is in the drums, you will need to have samples collected. An environmental laboratory of the City's choice should then test the samples using the toxicity characteristic leaching procedure (TCLP) to determine if the waste is hazardous or non-hazardous. Once the contents of the drums are determined, the City then can dispose of the drums at the proper locations.

## **INSPECTION PHOTOS**

### **Service Garage Area (Front/Rear)**

City of Fairview Park  
Photos Taken: June 29, 2010



**Fig 1:** The floor drain in the Front Service Garage should be capped or covered when not needed to prevent potential pollutants from entering the City's storm sewer system.



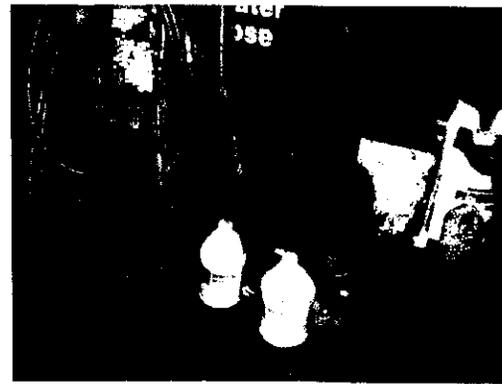
**Fig 2:** There should be a spill kit next to the fueling station in the event of a spill. Also, the City should clearly label the emergency shut off button.



**Fig 3:** There seems to be a leak or spillage coming from this tank. The City must clean up the area and identify the source of the spill to implement BMPs to address the pollutant.

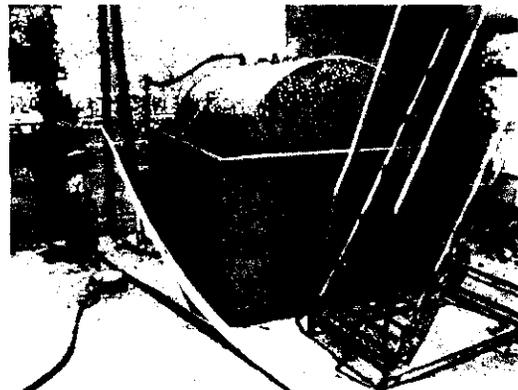


**Fig 4:** Unidentified barrels should be labeled and/or disposed of properly. The barrels should be stored on secondary containment, preferably inside the garage.

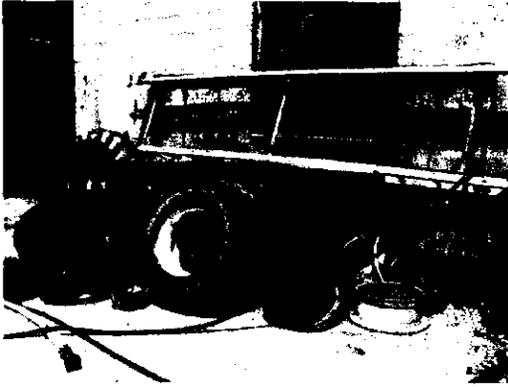


**Fig 5:** The City should clean the built out area where new oils are stored, and provide secondary containment for the drums.

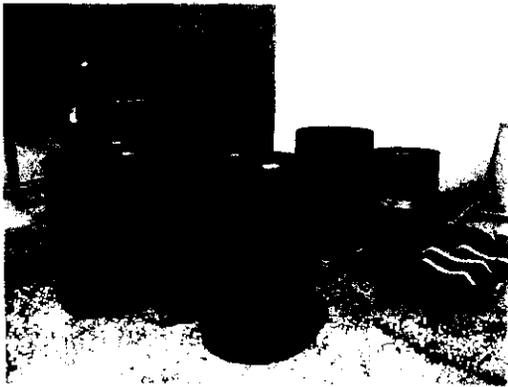
**Fig 6:** Chemicals, gas cans, and solvents should not be stored on top of a storm drain. The area should be reorganized and the floor drain should be capped if not needed or covered as a BMP.



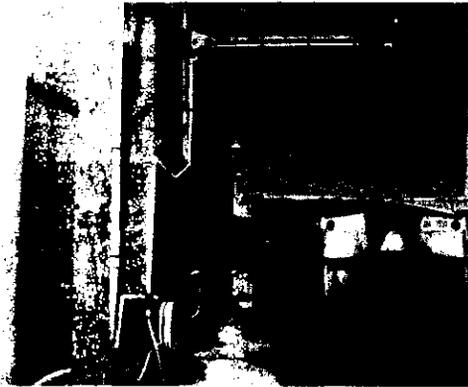
**Fig 7:** The used oil tank sits within secondary containment but is stored outside. The drain plug was in place in the dike, but the City must evaluate the runoff that accumulates within the dike before it is discharged. Oil sheens must be removed with absorbent pads or other such materials before this runoff can be discharged to the MS4.



**Fig 8:** All tires stored outside need to be tarped. Any unneeded scrape should be scraped out. The sign behind the ladder indicates the location for vehicle and equipment washing outside. This practice must cease and all wash water needs to be collected and/or directed to sanitary.



**Fig 9:** All drums need to be capped. Any drums with unknown substances need to be identified and then labeled or disposed of properly. If possible, drums should be stored indoors and in secondary containment.

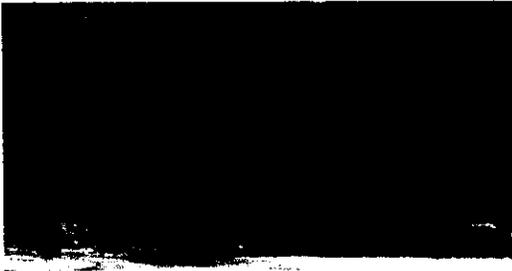


**Fig 10:** It may be beneficial for the City to add some sort of curtain to the CaCl sprayers to avoid overspray. The curtain should surround the sprayers and be long enough to prevent overspray before the chemical reaches the trucks.



**Fig 11:** The entrance to the salt dome is sandbagged to prevent salt runoff from entering the MS4. Please make sure all salt is pushed back into the dome.

**Fig 12:** The discharge of leachate into this catch basin should be prohibited. A more adequate form of inlet protection needs to be implemented.



**Fig 13:** At the back of the Service yard the City has a stockpile of catch basin cleanings as well as a few piles of composting leaves. The piles are adjacent to the Metroparks.

**Fig 14:** The leachate from these piles is not contained or collected, and the leachate discharging off-site constitutes as an illegal discharge into the City's MS4.



**Fig 15:** A pile of catch basin cleanings was found at the back of the Service yard, with no controls to prevent the discharge of the leachate from the pile. This constitutes as open dumping of a solid waste and is prohibited.

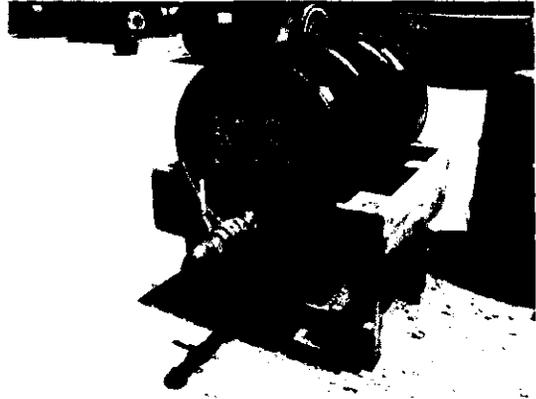
**Fig 16:** The back of the Service yard all drains down into the Metroparks. There is a clear gully of leachate and runoff draining down the hill.



**Fig 17:** A dump truck was parked at the maintenance yard that was leaking some sort of solid waste leachate. Trucks should be inspected regularly for leaks of leachate from solid waste and residuals still in the truck hoppers. Measures must be taken to prevent the discharge of leachate to the MS4 from this source.



**Fig 18:** There should not be open containers of materials stored outside. This bucket needs to be moved inside and lidded.



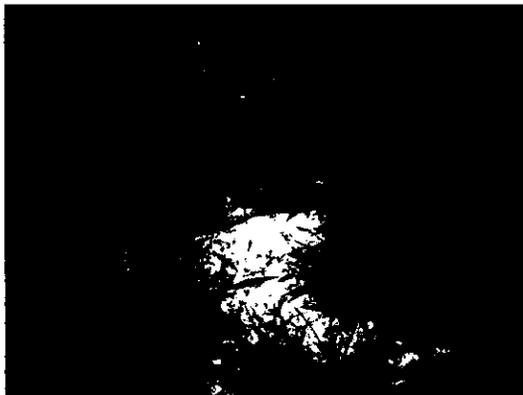
**Fig 19:** This drum should be move inside and there should be a dip pan or some sort of measure to contain a spill of leak under the spigot.



**Fig 20:** As a good housekeeping measure the City should be keeping their yard free of excess materials and dispose, recycle, or scrap out any unnecessary items.

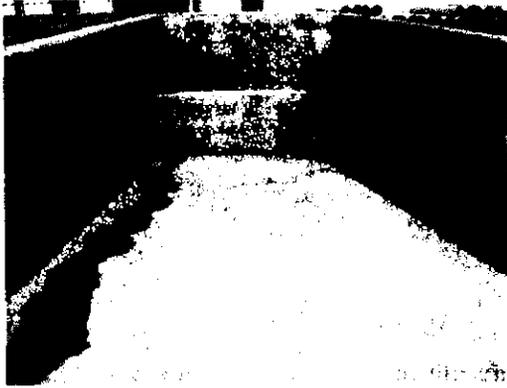


**Fig 21:** All tires stored outside need to be tarped until they can be picked up.

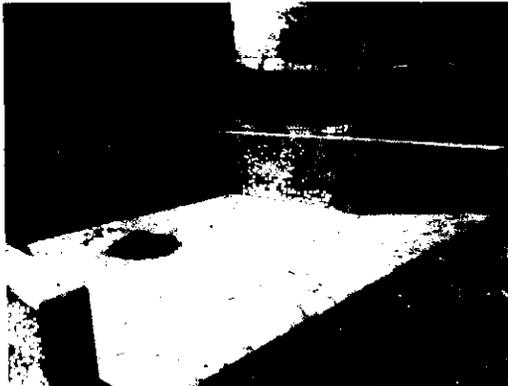


**Fig 22:** A damaged barrel was found at the back of the service yard on its side spilling what looked like white paint all over. This area needs to be remediated and the barrel and all its contents inside and out need to be disposed of in the proper manner.

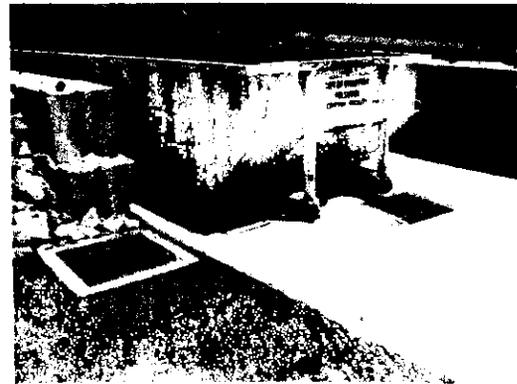
**Catch Basin Cleanings and Street Sweepings Disposal Ideas**



**Fig 1 and Fig 2:** Disposal area located at the Oberlin Service Complex. Materials are dewatered in the pit (drain leads to sanitary), and then scooped out into a covered dumpster and taken to a landfill.



**Fig 3:** This disposal area is located at the Wadsworth Waste Water Treatment Plant. The spoils are dewatered, placed in a covered dumpster and land filled.



**Fig 4 and Fig 5:** This disposal area is located at the Struthers Pump Station. The spoils are placed in this dumpster, which should be covered, and then dewatered before taken to a landfill. The dewatering process at this site includes a pump at the bottom of the dumpster to pump the waste water to sanitary, and then there are tiny holes along the bottom of the dumpster to drain waste water to the drain in front of the dumpster, which leads to sanitary.