



\*3GQ0006020100525\*

CUYAHOGA BEACHWOOD

CITY OF BEACHWOOD

3GQ00060 2010/05/25 MACPHERSON,  
LINDSIE

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**Environmental  
Protection Agency**

Rep. C. Casper, Governor  
Lt. Governor  
Director

May 25, 2010

RE: CUYAHOGA COUNTY  
CITY OF BEACHWOOD  
NOTIFICATION OF MUNICIPAL STORM  
WATER PROGRAM INSPECTION

Mr. Merle S. Gorden  
Mayor  
City of Beachwood  
25325 Fairmount Blvd.  
Beachwood, OH 44122

Dear Mr. Gorden:

This letter will serve as notice that Ohio EPA will be conducting a follow up inspection of your community's Storm Water Management Program (SWMP). This inspection is being conducted to determine compliance with the Ohio EPA General Storm Water NPDES Permit for Small Municipal Separate Storm Sewer Systems (Small MS4s) #3GQ00060\*BG.

Our inspection will focus on compliance with minimum control measure #6: Pollution Prevention and Good Housekeeping for Municipal Operations. We will be using the audit guidance manual developed by the United States Environmental Protection Agency. We anticipate that the inspection can be conducted in one day. I have set aside the dates of June 9<sup>th</sup> or 10<sup>th</sup>, 2010, to conduct the inspection. **Please contact me upon receipt of this letter to let me know which of these dates will work best for you.**

To streamline the inspection, please have the following resources ready and available on the date of the inspection.

- Map of the MS4 system or outfalls
- An inventory of municipal facilities and operations, i.e., composting yards, vehicle maintenance facilities, bus terminals, impound lots and waste transfer stations, if applicable, and the storm water pollution prevention plan (SWP3) developed for these facilities
- Contracts with any third party service providers that assist you in implementing your pollution prevention and good housekeeping programs
- Guidance documents or BMP manuals used for your pollution prevention and good housekeeping program
- Training records, i.e., the agenda and attendance record of any training your staff has attended regarding pollution prevention for municipal operations

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- List of active municipal construction projects, e.g., road projects
- The checklist used to inspect your municipal maintenance facility
- Street sweeping records, if performed
- Deicer application records, including a description of the materials used for deicing operations
- Inventory of flood management structures in your community which you maintain
- Fertilizer and pesticide application plan

Please make summaries or copies of this information that Ohio EPA can take for our files.

The inspection will consist of an interview followed by field inspections of your municipal operations facilities including your maintenance facility (or facilities, as appropriate), facilities where vehicle maintenance, composting activities, vehicle impoundment and waste management activities occur, **and** any facility which requires an NPDES permit for industrial storm water discharges. Please have the appropriate persons available to answer the interview questions and questions that arise during field inspections. I anticipate the interview will take no more than 2 to 3 hours to complete and will leave it to your discretion to schedule the field inspections. It should take no more than 2 hours to inspect each facility.

I look forward to working with you to perform the inspection. Please contact me to confirm the inspection date or to schedule a new date if necessary. You can 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 S. Kreczko, Storm Water Management Coordinator

# Municipal Storm Water Program Evaluation

## MS4 Maintenance Component Worksheet

<b>Date of Evaluation</b>	Nov 2, 2010
<b>Evaluator Name, Title</b>	<b>Dan Bogoevski, DSW, NEDO</b>
<b>MS4 Permittee</b>	<b>City of Beachwood</b>

**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.

Staff Interviewed		
Name	Department/Agency	Phone Number/Email
Tom Kreczko	Building Department City of Beachwood	(216) 292-1917 Thomas.kreczko@beachwoodohio.com
Tim Tremaglio	Service Dept/Superintendent of Streets and Utilities City of Beachwood	(216) 292-1922 Tim.tremaglio@beachwoodohio.com
Dale Pekarek	Service Director City of Beachwood	(216) 292-1929 Dale.pekarek@beachwoodohio.com

MS4 Mapping		
Interview Questions	Response	
Outfalls and receiving waters mapped?	YES (see note)	NO
Catch basins?	YES	NO
Pipes, ditches, other conduits?	YES	NO
Public stormwater facilities (BMPs)?	YES	NO
Private stormwater facilities (BMPs)?	YES	NO
How are maps used (i.e. tracking illicit discharges)?	Streets department uses to investigate sewer back-ups in residential settings, flooding complaints	
Applicable Documents	Reviewed	Obtained
Map(s) of MS4 system	YES	YES

Notes
In 2009, dry weather screened 24 outfalls and state that there were flows at all 24. Clarify. TOM WILL VERIFY THAT WITH CCBH.
In 2009, 5 illicit discharges were identified and zero were eliminated. City did not provide an

**Notes**

attachment with schedules to eliminate these illicit discharges with 2009 annual report. What follow-up has occurred? **NEED TO PROVIDE ME.**

In 2010, they only plan to eliminate one illicit discharge (EW5A0010) and state that won't occur until Dec 31, 2012. Why? **NEED TO PROVIDE TO ME.**

City has 110 outfalls. CCBH screened 24 in 2009. Are these different outfalls each year? CCBH picks the outfalls to monitor and repeat a good number of the outfalls where problems were previously identified. Outfalls along Cedar to Highland Golf Course are problematic ones.

**Mapping**

Check map on disc. Is supposed to have 110 outfalls. Paper map has less. Laterals within the ROW are publicly-owned and maintained, but haven't been mapped yet.

**Catch Basin Cleaning**

<b>Interview Question</b>	<b>Response</b>
Schedule established for inspections and cleaning?	<b>YES</b> <b>NO</b>  Schedule by streets. Entire City is done every 3 years. Map is color coded by year. Contracted out. Contractor has a drying area off-site and is obligated to properly dispose of solids and liquids in their contract. Not a contract... is a bid specification.
Is cleaning and maintenance of catch basins tracked:	<b>YES</b> <b>NO</b>
How are spoils materials disposed of?	See Notes above. Contractor responsible to properly dispose of material. Triple A Pipe Cleaning – Bessemer Ave Cleveland is contractor. Do not review their operations to ensure compliance, but do have general language.
Are storm drain pipes inspected?	<b>YES</b> <b>NO</b>

Proactive or only in response to blockage event?	Storm sewers are filmed if there is a blockage or if there will be extensive road repair. But, no real proactive storm sewer camera program.	
<b>Applicable Documents</b>	<b>Reviewed</b>	<b>Obtained</b>
List of active municipal construction projects		
<b>CHECK DATABASE BEFORE INSPECTION:</b>		
List of municipal projects covered under the Ohio EPA general storm water NPDES permit for construction activities		
3GC00077*AG Beachwood Municipal Complex 2003 5.9 acres	File NOT	
3GC00416*AG Beachwood Signature Park West 2003 12 acres	File NOT	
3GC05008*AG Eaton Blvd. 2010 8 acres Contech StormFilter but no discharge rate control.	Still Active	
Where is the new service center NOI? Land disturbance < 1 acre. Also did a road resurfacing on S. Woodland with adding a lane on Shaker Blvd, but less than 1 acre of disturbance.		
<b>NOTE:</b> Permit is only required if project disturbs 1 or more acre (5 or more acres for "routine maintenance")		

Notes
<p>Has CESSWI certification of inspectors occurred yet? GPD provides inspectors and they would be the ones that would send the inspectors through certification classes. Marty Compton manages the program for GPD. Inspectors have not yet been certified, but will be this off season in winter.</p> <p><b>Construction site inspections are not once per month as required by NPDES permit. No inspections conducted at municipal construction in 2009.</b> Aware of requirement, and it is their general goal, but it hasn't been happening. Still doing every other month. However, starting this year, they require the contractor to submit weekly inspection reports. Reports are reviewed for consistency with the observations of GPD's inspectors. Inspectors do not use checklists to document inspection problem.</p> <p>Does Beachwood inspect ODOT projects? One project listed in Beachwood for I-271 in NOI database. No, they would not inspect this type of project, but would inspect random earth disturbances of 1 or more acre.</p>

Stormwater Management Facilities Operation and Maintenance	
Interview Questions	Response

<b>Stormwater Management Facilities Operation and Maintenance</b>			
<b>Interview Questions</b>		<b>Response</b>	
Public facilities inspected?		YES	NO
Frequency:		<p>But, do maintenance and note when maintenance is needed.</p> <p>Fire Station #1 – retention basin  Tennis Courts – retention basin  City Hall/Pool – underground detention  Mercantile Service Center – detention basin  Pool – underground detention</p> <p>Maintenance activities include grass cutting, clean out of debris in swales (weekly or bi-weekly). None of these practices are water quality BMPs.</p>	
Private facilities inspected?		YES	NO
Frequency:			
Checklist used for inspections?		YES	NO
Have maintenance standards and procedures been established for these facilities?		YES	NO
How is maintenance prioritized? Is data evaluated to target maintenance resources?		YES	NO
		<p>There are some sections reviewed due to flooding concerns, but not really for water quality.</p>	
<b>Applicable Documents</b>		<b>Reviewed</b>	<b>Obtained</b>
Inspection checklist		DOESN'T EXIST	

<b>Notes</b>
<p><b>City has not yet adopted or developed standards for post-construction BMP maintenance. Get the m copy of disc with Akron and Solon info.</b></p>

<b>Road Maintenance</b>	
<b>Interview Questions</b>	<b>Response</b>
<p>Streets regularly swept?</p> <p>Frequency:</p>	<p style="text-align: center;"><b>YES</b>                      <b>NO</b></p> <p>Whole city is swept twice a month. March through November, typically.</p>
<p>Frequency based on water quality factors (e.g. proximity to streams)?</p>	<p style="text-align: center;"><b>YES</b>                      <b>NO</b></p> <p>Keeps debris off the roads. They have committed to this under the SWMP.</p>
<p>How are spoils disposed of?</p>	<p>Mechanical sweeper, not vacuum. Debris is dumped into a bin at the Shaker Blvd Storage Yard. Held there until bin is full. Picked up by Waste Management and taken to landfill. Bills of Lading were provided. Bin at storage yard is contained with concrete barriers. Plan is to relocate this operation to the new Mercantile facility and store debris inside.</p>
<p>Does the community collect road kill?</p> <p>What do they do with the carcasses?</p> <p><b>NOTE:</b> MS4s are not obligated to collect road kill, but if they do, can be disposed in dumpsters or taken to a licensed, Class II composting facility. Cannot have pile of carcasses stacked up. This is open dumping.</p>	<p style="text-align: center;"><b>YES</b>                      <b>NO</b></p> <p>Picked up by city garbage collection program. Mixed in with trash and taken to landfill.</p>
<p>Does the community have a leaf collection program?</p> <p>What do they do with the collected leaves?</p> <p><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.</p>	<p style="text-align: center;"><b>YES</b></p> <p>Leaves stored at Shaker Blvd Storage Yard. Just a storage operation, not a composting operation. Sell to mulch manufacturers such as Kurtz Brothers. It's bid out. Pile sits there about month to six weeks. Does not break down before its removed from the site.</p> <p>Composting of yard waste (not including leaves collected). Check with CCBH and DSIWM for their observations. No controls for leachate because they state they don't generate any.</p>
<p>BMPs used during road maintenance activities?</p> <p>Describe types of road maintenance conducted by community staff and the BMPs used</p>	<p style="text-align: center;"><b>YES</b>                      <b>NO</b></p> <p>Cold patch, crack sealing, concrete repair. No documentation of training, but Street Dept</p>

<b>Road Maintenance</b>			
<b>Interview Questions</b>		<b>Response</b>	
		manager verbally provided instructions.	
BMP guidance available to field staff?		YES	NO
Deicers used by MS4?		YES	NO
Type and amount of deicer and additives tracked?		YES	NO
What measures are being taken to minimize the application of deicers?		Just road salt, no calcium chloride or beet juice. No cinders.	
Sand/salt swept up after application?		YES	NO
How soon?		N/A	
Does your community operate a snow stockpile yard to store snow that has been removed from community streets and parking lots?		YES	NO
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?		YES	NO
If YES, what BMPs have you implemented?			
<b>Applicable Documents</b>		<b>Reviewed</b>	<b>Obtained</b>
BMP guidance		Does not exist	
Street sweeping records		YES	Bills of Lading from Landfill submitted with annual report. Suggested that this total be

Road Maintenance		
Interview Questions	Response	
		added to the listing to City Council
Deicer application records	YES	Is estimated based on how much is ordered and what's left

Notes
<p><b>Sensible Salting</b></p> <p>This was put out there when salt supplies are low, not that they really wanted to reduce the salt usage. Beachwood has its own version of the sensible salting policy. <b>NEED TO PROVIDE ME WITH COPY.</b> Some trucks have electronic spreaders (calibrated with speed), some are older trucks. They have not looked at only plowing certain streets. All streets are salted. Residents expectations drive this.</p>

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

Notes

**Notes**

**City has passed a post-construction ordinance but still need to update to meet CGP minimum requirements.**

**Facilities Operation & Maintenance**

Interview Questions	Response	
Inventory of MS4 facilities complete (i.e. facilities owned and operated by the MS4)?	YES	NO
<p><b><u>Types of facilities included</u></b>  <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"> <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 1</math> MGD or with a pretreatment program</li> </ul>	<p><b><u>Response</u></b></p> <p>YES      NO</p>	<p><b><u>SWP3 Developed?</u></b></p> <p>YES      NO</p> <p>YES*      NO</p> <p>YES      NO</p> <p>YES      NO</p>
<p><i>These do not need their own permit, but do have to develop an SWP3 unless noted as N/A:</i></p> <ul style="list-style-type: none"> <li>• Impound Lots</li> <li>•</li> <li>• Leaf Collection Yards  <ul style="list-style-type: none"> <li>✓ No discharge of leafate permitted</li> </ul> </li> </ul>	<p><b><u>Response</u></b></p> <p>YES      NO</p> <p>Mercantile Rd</p> <p>YES      NO</p>	<p><b><u>SWP3 Developed?</u></b></p> <p>Indoors at 23865</p> <p>N/A</p>

**NOTE:** 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.

**Facilities Operation & Maintenance**

Interview Questions	Response			
<ul style="list-style-type: none"> <li>• Maintenance Yards                             <ul style="list-style-type: none"> <li>➤ How many do they operate? <u>  1  </u></li> <li>➤ List facility names/locations:</li> </ul> </li> </ul>	YES	NO	YES	NO
	Currently located 2700 Richmond Road, but a new facility is under construction. Should be in operation by January 2011. 23355 Mercantile Rd. Asked for copy of SWP3.			
<ul style="list-style-type: none"> <li>• Composting Operations                             <ul style="list-style-type: none"> <li>✓ No discharge of leachate permitted Shaker Blvd East – no address</li> </ul> </li> </ul>	<u>Response</u>		<u>SWP3 Developed?</u>	
	YES	NO	YES	NO
<ul style="list-style-type: none"> <li>• Solid Waste Transfer Stations or Operations                             <ul style="list-style-type: none"> <li>✓ Under landfill permit if community owns the transfer station and the landfill where waste will be taken</li> <li>✓ If not, then SWP3 is only needed if vehicle maintenance, equipment washing or fueling activities occur at the transfer station, <b>or</b> if a portion of the facility is involved with recycling or composting</li> </ul> </li> </ul>	YES	NO	YES*	NO
	Do their own garbage collection, but not an official waste transfer station. Trucks are currently parked outside at 2700 Richmond Rd, but will be relocated to 23355 Mercantile Road. Trucks will be parked indoors there. Floor drains go to sanitary.			
<ul style="list-style-type: none"> <li>• Parks &amp; Cemeteries                             <ul style="list-style-type: none"> <li>➤ How many in UA? <u>  8  </u></li> <li>➤ List facility names/locations:</li> </ul> </li> </ul> <p>See list.</p>	YES	NO	N/A	
<ul style="list-style-type: none"> <li>• Parking Lots                             <ul style="list-style-type: none"> <li>➤ How many do they operate? <u>  0  </u></li> <li>➤ List facility name/locations:</li> </ul> <p>No dedicated municipal parking lot that is not associated with a municipal building (e.g., city hall complex)</p> </li> </ul>	YES	NO	N/A	
<ul style="list-style-type: none"> <li>• Bus Terminals</li> <li>• Vehicle Maintenance Garages                             <ul style="list-style-type: none"> <li>➤ How many do they operate?</li> <li>➤ List facility name/locations:</li> </ul> </li> </ul>	YES	NO	YES*	NO
	YES	NO	YES*	NO
	*SWP3 (or, in case of airport and shipping port, NPDES permit for industrial storm water) required only if vehicle maintenance, equipment cleaning or deicing operations occur.			



<b>Facilities Operation &amp; Maintenance</b>	
<b>Interview Questions</b>	<b>Response</b>
<p>Staff which perform the inspections (department or agency):</p> <p><b>NOTE:</b> Go through list above where YES is response and write in answers for each activity. Checklist should document name of inspector.</p>	<p><b>NONE YET</b></p>
<p>Is there a designated stormwater contact person for each facility?</p> <p><b>NOTE:</b> Go through list above where YES is response and write in answers for each activity. Name is SWP3 should match name given. If not, SWP3 must be updated.</p>	<p>YES                      NO</p> <p><b>NOT YET</b></p>
<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>	<p>Progressive discipline through union contract. Service Director sets work rules. Instructed them to include implementation of SWP3 in work rules.</p>
<p>Parking lots owned/operated by the permittee swept?</p> <p>Frequency?</p>	<p><b>YES</b>                      <b>NO</b></p> <p>Twice a month.</p>

**Facilities Operation & Maintenance**

<b>Interview Questions</b>	<b>Response</b>	
<p>Do you operate any asphalt parking lots?</p> <p>Do you use any coal tar-based sealants on those asphalt parking lots?</p> <p><b>NOTE:</b> Some MS4s have banned the use of coal tar-based sealants in their communities. Research from the University of New Hampshire Stormwater Center and by the City of Austin, TX, has shown these sealants contaminate soil and runoff with PAHs and benzo(a)pyrene, a known carcinogen. If a sealant must be used, asphalt-based sealants are preferred.</p>	<p><b>YES</b></p> <p><b>YES</b></p>	<p><b>NO</b></p> <p><b>NO</b></p>
<p>Do you have any combined sewer systems?</p> <p>If yes, do you have any combined sewer overflows?</p> <ul style="list-style-type: none"> <li>➤ How many? _____</li> <li>➤ Do you track frequency and volume?</li> </ul> <p>Are you aware of any illicit cross connections between your sanitary sewer and MS4?</p> <p>If so, what is your plan to eliminate this illicit discharge?</p>	<p><b>YES</b></p> <p><b>YES</b></p> <p><b>YES</b></p>	<p><b>NO</b></p> <p><b>NO</b></p> <p><b>NO</b></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><b>YES</b></p>	<p><b>NO</b></p>

All but Fire Station #1 and a portion of the Mercantile Service Garage.

Do not use sealants.

GET CLARIFICATION ON THE 2009 ANNUAL REPORT OBSERVATIONS ON DRY WEATHER FLOWS AND EXISTENCE OF ILLICIT DISCHARGES.

Did a study years ago and found that there were sanitary sewers tied into storm all over the place. Those corrections were made long time ago.

Found a situation where storm and sanitary laterals were tied together and went into storm sewer. That was 10 years ago. Resident reported blockage/back up. Otherwise, do not do a proactive .

Lyndhurst referred an illicit discharge to them. They filmed the sewer line and found no source of flow.

<b>Facilities Operation &amp; Maintenance</b>			
<b>Interview Questions</b>		<b>Response</b>	
Sewer spill and cleanup procedures in place?		YES	NO
		The sanitary sewers are operated by NEORSD and the Streets Dept knows to call them when overflows occur.	
<b>Applicable Documents</b>		<b>Reviewed</b>	<b>Obtained</b>
Facility inventory		YES	YES
Facility SWPPP		Will Provide	

<b>Notes</b>

<b>Pesticides, Herbicides &amp; Fertilizers</b>	
<b>Interview Questions</b>	<b>Response</b>
Certified applicators used?	YES NO Fertilizer is contracted. Pesticide is still applied by the City. Injected. Licensed. Asked for copy of license. No spraying.
Integrated Pest Management (IPM) practices used?	YES NO
Storage location of pesticides, herbicides, and fertilizers:	In locked cabinet in the explosion room at 2700 Richmond. No designated place yet at new Mercantile facility.
BMPs used during application:	No spraying of pesticides. Pump sprayers for herbicides. They are trained to watch wind direction and speed. No SOP written out.

Fertilizer/pesticide application plan utilized?	YES Need to provide.	NO
<b>Applicable Documents</b>	<b>Reviewed</b>	<b>Obtained</b>
Fertilizer/pesticide application plan	Need to provide.	

Notes

Standards, BMPs, & Outreach	
Interview Questions	Response
BMP technical guidance document available to maintenance staff?	YES NO No formal training has been provided to the maintenance staff.
MS4 use contractual staff to complete MS4 maintenance activities?	YES NO
BMP guidance materials provided to contracted staff?	YES NO
Requirement to consider stormwater impacts and utilize appropriate BMPs in contracts?	YES NO
Materials used to educate the public regarding stormwater impacts on MS4 property (if applicable, i.e. public spaces):	Pet waste: Used the local Beachwood Buzz to educate. No dog licensing requirement. Euclid Creek educational materials on website and made available at the Community Center.  Litter reduction: No brochures. Dumpsters available at Maintenance Facility at 2700 Richmond Road.

<b>Standards, BMPs, &amp; Outreach</b>			
<b>Interview Questions</b>		<b>Response</b>	
<b>Applicable Documents</b>		<b>Reviewed</b>	<b>Obtained</b>
BMP manual or guidance document			
Contract language for MS4 operation and maintenance activities			

<b>Notes</b>

<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 discharges?		YES	NO
Frequency:			
Materials used to train staff:		This is a violation that needs corrected. No training provided beyond the managerial staff that has attended the Ohio EPA training sessions.	
<b>Applicable Documents</b>		<b>Reviewed</b>	<b>Obtained</b>
Training materials			

<b>Notes</b>

**Notes**