



3GQ0007920090710

CUYAHOGA BAY VILLAGE

CITY OF BAY VILLAGE

3GQ00079 2009/07/10 SAFRANEK,
KENNETH

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State of Ohio Environmental Protection Agency

Northeast District Office

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

July 9, 2009

RE: CUYAHOGA COUNTY
CAHOON CREEK WATERSHED
CITY OF BAY VILLAGE
NOTIFICATION OF MUNICIPAL STORM
WATER PROGRAM INSPECTION

James Sears
Storm Water Program Coordinator
City of Bay Village
350 Dover Center Rd.
Bay Village, OH 44140

Dear Mr. Sears:

Ohio EPA has completed an audit of the City of Bay Village Municipal Storm Water Program, Minimum Control Measure #6. This program is a requirement of the Ohio EPA General Storm Water NPDES Permit for Small Municipal Separate Storm Sewers Systems (MS4s) OHQ000079*AG and Ohio Administrative Code 3745-39. On June 16, 2009, Ohio EPA met with you and other representatives of the City of Bay Village to determine compliance with the NPDES permit and the Storm Water Management Plan (SWMP) submitted by the City in March 2003.

Storm water best management practices (BMPs) were evaluated to determine if they are being implemented per the expectations of Ohio EPA. 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) used during the audit with comments by Ohio EPA regarding your MS4 program. Please review them in detail to determine specific elements where your program needs improvement. In these attachments you will find comments detailing ways to improve your MS4 program. Listed below are violations or deficiencies that will need to be addressed:

Violations

- **Failure to develop a map of MS4 outfalls and the location of discharges from household sewage treatment systems (HSTSs) by the end of first 5-year NPDES permit term.** This is a violation of Part 3.2.3.1.2.1 of NPDES permit #OHQ000079*AG and Ohio Revised Code 6111.04 and 6111.07. The map was to be completed no later than April 3, 2008. This map was not developed until 2009 and did not include the location of HSTS discharges. Please note that the map must be expanded in accordance with Part III.B.3.b of NPDES permit #OHQ000079*BG no later than June 3, 2014.

- **Failure to ensure adequate long-term operation and maintenance of public/private stormwater management facilities.** This is a violation of Part III.B.5.d of the NPDES permit and ORC 6111.04 and 6111.07. A long-term maintenance program for post-construction BMPs was supposed to be in place no later than April 3, 2008. The City has only recently contracted with Michael Benza & Associates to develop the required program. A program to ensure long term maintenance of post-construction BMPs typically includes (a) maintaining an inventory of all public post-construction BMPs and private BMPs installed since April 21, 2003, (b) maintaining a copy of the long-term maintenance plan for each BMP, and (c) establishing a system to track maintenance activities by the responsible party, including enforcement action when necessary.
- **Failure to implement the riparian and wetland setback ordinance contained in your Storm Water Management Program (SWMP).** This is a violation of Part III.B.5.e.iii of the NPDES permit and ORC 6111.04 and 6111.07. The SWMP states that the City will enact a riparian and wetland setback ordinance as a non-structural BMP strategy for your post-construction program. This ordinance was required to be implemented no later than April 3, 2008. This ordinance has never been enacted. Further, Ohio EPA has not received a request to replace or subtract this BMP as required by Part III.D.2.b of the NPDES permit. As such, Ohio EPA expects the City of Bay Village to implement a riparian and wetland setback ordinance.
- **Failure to specifically list the municipal operations that are impacted by the operation and maintenance program.** This is a violation of Part III.B.6.d.i of the NPDES permit and ORC 6111.04 and 6111.07. The Storm Water Management Plan (SWMP) submitted in 2003 with your MS4 permit application was required to identify all municipal operations impacted by the MS4 program. The SWMP failed to identify one maintenance yard, five parks, and 13 parking lots.
- **Failure to implement plans or procedures to eliminate known sources of illicit discharge from your MS4.** This is a violation of Part II.B.3.i.iv of the NPDES permit and ORC 6111.04 and 6111.07. During the interview you noted four sanitary overflows that lead into your storm sewers. The City has only eliminated one and is currently making plans to eliminate another. No plan or schedule has been developed to eliminate the two remaining sources. The City must have a plan with a schedule to eliminate illicit discharges into the MS4.

Deficiencies

- The dewatering and storage of catch basin cleanings at the maintenance yard requires improvement. The current set-up may not fully capture leachate. Your NPDES permit does not authorize the discharge of leachate. Further, the dumpster in which cleanings are stored after dewatering is not covered. Please plan to install a proper dewatering pit and dumpster that can fully contain all of the material.

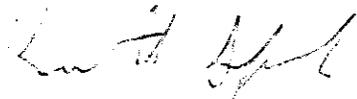
JAMES SEARS
JULY 9, 2009
PAGE 3

- 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 only held one employee training event on storm water pollution prevention matters during the first 5-year NPDES permit term. Please be aware that NPDES permit #OHQ00079*BG requires you to provide one staff training event per year.
- The City does not conduct regular inspection of the MS4, but does have the equipment to camera their storm sewer pipes. You could improve your program by implementing a regular proactive inspection of the MS4 to prompt identification of illicit discharge.

Please review my comments and provide me with a letter of response indicating the actions you will take to address the violations and my concerns. **Your response should be received no later than August 7, 2009.** Please note that this response does not replace the requirement to submit an Annual Report. Your Annual Report for 2009 will be due on April 1, 2010.

If you have any questions, please contact me at (330) 963-1125 or Kenneth.Safranek@epa.state.oh.us.

Sincerely,



Kenneth Safranek
Assistant to the District Engineer
Division of Surface Water

KS:bo

enclosure(s)

pc: Deborah L. Sutherland, Mayor
Laura Travers, Cuyahoga County Board of Health
Hugh Thomas, Michael Benza and Associates

Municipal Storm Water Program Evaluation

MS4 Maintenance Component Worksheet

Date of Evaluation	June 16th, 2009
Evaluator Name, Title	Kenneth Safraneh Assistant to District Engineer Ohio EPA Northeast District Office
MS4 Permittee	City of Bay Village

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
Jim Sears Director of Public Service and Property	Service Department	440.899.3422 jsears@cityofbayvillage.com
Don Landers Operations Manager	Service Department	440.871.1221 dlanders@cityofbayvillage.com
Dave Kepic Assistant Director of Public Service and Property	Service Department	440.871.1221
Hugh F. Thomas P.E. Contracted Engineer for MS4 Compliance	Michael Benza & Associate, Inc.	440.526.4206 hught@mbenzaengr.com
Deborah L. Sutherland Mayor	City of Bay Village	440.899.3415 dsutherland@cityofbayvillage.com

MS4 Mapping		
Interview Questions	Response	
Outfalls and receiving waters mapped?	YES	
Catch basins?	NO	
Pipes, ditches, other conduits?	NO	
Public stormwater facilities (BMPs)?	NO	
Private stormwater facilities (BMPs)?	NO	
How are maps used (i.e. tracking illicit discharges)?	Cuyahoga County Board of Health is contracted to do a mapping of outfalls that will start at the beginning of 2010. The map is used for dry weather screening.	
Applicable Documents	Reviewed	Obtained
Map(s) of MS4 system	YES	YES

Notes

M54 Map:

The M54 system in Bay Village consists mainly of pipe and very little open ditch conveyance. There are an estimated total of 111 outfalls. The map that has been developed for the M54 program indicates the location of outfalls to the receiving waters of the state but it does not differentiate by type. In addition, the city has an older sewer map that includes the M54 pipe system but does not include the receiving waters.

Additionally, this map did not include privately or publicly owned storm water management facilities constructed since 2003. You will need this information to implement a long-term maintenance program for post-construction BMPs as required by Minimum Control Measure #5 in your municipal storm water permit.

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

Catch Basin Cleaning

Interview Question	Response
Schedule established for inspections and cleaning?	YES
Is cleaning and maintenance of catch basins tracked:	YES
How are spoils materials disposed of?	Spoils are deposited into a dewatering pit and then transferred to an adjacent BFI dumpster. The dumpster is emptied on an as needed basis when it is full. This process needs improvement. See Notes.
Are storm drain pipes inspected? Proactive or only in response to blockage event?	NO Storm drain pipes are inspected in response to blockages or complaints. Flushing of pipes is done with a sewer jet and spoils are collected.

Applicable Documents	Reviewed	Obtained
List of active municipal construction projects	None	N/A
List of municipal projects covered under the Ohio EPA general storm water NPDES permit for construction activities	N/A	None planned
NOTE: Permit is only required if project disturbs 1 or more acre (5 or more acres for "routine maintenance")		

Notes

Catch Basin Cleaning

The current set up for spoils disposal needs improvement. Currently, spoils are placed in a pit dug into the ground and solids are scooped out and placed in a dumpster. The solids are still wet when transferred. This can lead to a possible violation if any leachate is discharged. The dumpster did have a hole to let residual leachate empty. Leachate must be directed back to the pit so as to contain it on site or, you will need to plug the hole or replace the bin. In the future, we recommend that a proper dewatering pit with a connection to sanitary sewers be established. Please plan accordingly when you are renovating your service yard.

Cleaning begins in the spring where a crew will use a vactor truck to clean and inspect all catch basins. This is done once a year and then any follow up cleaning will be done in response to a blockage event or complaint. You could improve your program by implementing a scheduled, proactive inspection of your entire MS4 system throughout the year.

The City does not currently flush storm sewer pipes or will only flush storm sewer pipes if there is a problem. Flushing involves using the sewer jet to move water through the pipe to force out debris which will then be collected and disposed of at a proper landfill. Currently, there is no scheduled flushing of the storm sewer pipes. If there are problems with a storm sewer pipe, the City has the ability to camera the problem area and flush any debris that has caused a back up. Along with keeping a written record of these events, a digital record could be compiled to better assess problem areas. In addition, a scheduled visual inspection of all storm sewer pipes could greatly improve your MS4 program.

There is a map kept at the service department where all maintenance and cleaning is recorded. During the cleaning process, inspections of catch basins will be completed as well as any needed repairs. In 2008, there was a total of 162 tons of debris that was pulled out of the MS4 system, a figure that also included street sweepings. It is recommended that you track these two figures separately for the next permit term.

MS4 System Repair

Most repairs are done by the City including catch basin rebuilding and small reconstruction projects. Currently, the procedure is based on complaints but should be more proactive. Along with the previous comments, an annual or biannual inspection of all storm sewer pipes would help you better identify the sections of the MS4 that require repair and could prevent some illicit discharges into your MS4 system.

Stormwater Management Facilities Operation and Maintenance	
Interview Questions	Response
Public facilities inspected?	The city does not own or operate any public storm water facilities at this time.
Private facilities inspected?	NO
Frequency:	N/A
Checklist used for inspections?	Under development
Have maintenance standards and procedures been established for these facilities?	Under development

Stormwater Management Facilities Operation and Maintenance			
Interview Questions		Response	
How is maintenance prioritized? Is data evaluated to target maintenance resources?		N/A (limited amount of facilities)	
Applicable Documents		Reviewed	Obtained
Inspection checklist		None	None

Notes
<p>Long Term Maintenance Schedule</p> <p>Part 3.2.5.1.4 of your NPDES #OHQ000001 Permit requires the establishment of a program to assure long-term maintenance of both public and private storm water facilities. There has been no procedures or inspection checklists developed to comply with this section of the permit. To comply with this section, the City has contracted with Michael Benza & Associates, Inc. We were provided an MOU between the City and the engineer that states Benza & Associates will aid in compliance with Post Construction Storm Water Management in New Development and Redevelopment. This specifically included site inspection procedures and development of a checklist. The current proposal makes the City's Building Department ultimately responsible for the long term maintenance of any public or private facilities.</p> <p>There are two private storm water facilities in the City of Bay Village that include a wet retention basin at Bay High School, and an enhanced swale at St Rafael Church. This is the first year that the City will be inspecting these facilities. We recommend that the city inspects these facilities at least once per year and develop a system to document and track inspection results and corrective actions taken.</p> <p>Bay Village is mostly developed and built-out. For this reason, it is important to look for retrofit opportunities by making a list of potential water quality enhancement projects or reviewing post-construction BMPs for current and planned municipal construction projects. This would include adding bioretention cells in parking lots, resurfacing with permeable pavement or establishing an incentive program for rain gardens, rain barrels and downspout disconnection in residential areas.</p>

Road Maintenance	
Interview Questions	Response
Streets regularly swept?	YES
Frequency:	Streets are sweep two times a year starting in the spring. A mechanical sweeper is used to collect the debris. The main roads are swept followed by all the side roads. A map is kept at the Service Department to track the streets that have been swept.
Frequency based on water quality factors (e.g. proximity to streams)?	No. The city is mostly residential but should focus on historically problematic areas.
How are spoils disposed of?	Street sweepings are taken from the sweeper and put directly into a dumpster.
Does the community collect road kill?	YES
What do they do with the carcasses?	Road kill is put into the same dumpster as that used for street sweepings and catch basin

Road Maintenance	
Interview Questions	Response
<p>NOTE: 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>cleanings.</p>
<p>Does the community have a leaf collection program?</p> <p>What do they do with the collected leaves?</p> <p>NOTE: 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;">YES</p> <p>The City does have a leaf collection program that runs from mid October to the end of December. Leaves are collected using the vacuum truck and taken directly to a jointly (City of Westlake) owned composting facility. The compost is then sold to the residents.</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>Most road maintenance is done by the City including catch basin rebuilding, partial depth grinding and repair, and curb repair. Contracted work could include road striping. The city does not currently use inlet protection whenever they are doing a project, such as curb repair, where suspended solids could enter into the MS4. It was recommended the city invest in inlet protection when doing these types of projects. They do use good housekeeping practices when they rebuild catch basins, cleaning out any debris they have created with the vacuum truck.</p>
<p>BMP guidance available to field staff?</p>	<p style="text-align: center;">NO</p> <p>It was suggested that small guides or field manuals detailing BMPs be placed into equipment or vehicles for quick reference.</p>
<p>Deicers used by MS4?</p> <p>Type and amount of deicer and additives tracked?</p> <p>What measures are being taken to minimize the application of deicers?</p>	<p style="text-align: center;">YES</p> <p>NaCl, or road salt, is used for deicing purposes. The City of Bay Village will be starting to use "Sensible Salting" procedures. As of now they only salt major roads, intersections or stop signs. The trucks used for salting are calibrated for salt application to the appropriate amount for each storm event. Each truck is also responsible for a certain route to avoid reapplication of salt. Salt application is tracked by starting inventory plus purchases minus remaining inventory.</p>
<p>Sand/salt swept up after application?</p>	<p style="text-align: center;">YES</p>

Road Maintenance		
Interview Questions	Response	
How soon?	Salt is swept after application but the storage facility is not large enough to contain all the salt. This leaves the salt exposed to precipitation. Either manage inventory more carefully, establish additional protected salt storage areas or provide tarps to prevent contact with precipitation.	
Applicable Documents	Reviewed	Obtained
BMP guidance	None	
Street sweeping records	YES	YES
Deicer application records	YES	YES

Notes
<p>Street Sweepings: The Container that holds the street sweepings is uncovered. Storm water that contacts street sweepings is classified as leachate, a wastewater, and cannot be discharged. The currently set-up allows leachate to seep out onto the ground where it can drain off site. This system must be improved to prevent leachate discharges or to direct them to the sanitary sewer system.</p> <p>Deicer Application As part of your compliance with #OHQ000002 you will need to adequately track your usage of deicing materials. The current practices could be improved by keeping a more detailed record of salt application. More detailed tracking of this information may allow you to better identify inefficiencies in salt application, e.g., track truckloads used and snowfall totals. Note when icing events occur and see if salt application is truly correlated to need. This is better than simply summarizing a grand total at the end of the year.</p> <p>The salt storage facility needs to be improved as well or a new structure should be constructed as part of the renovations to the service yard. The salt pile was jutting out from the roofed area and a tarp had been placed over the entire pile. There were also straw bales around the perimeter of the extruding salt and the tarp was weighted down. The tarp is an acceptable measure but needs daily maintenance to ensure there is no erosion of the salt pile. The straw bales will not trap any dissolved salt.</p>

Flood Management	
Interview Questions	Response
Inventory of flood management structures completed?	N/A The City of Bay Village does not own or operate any Flood Management Structures.
Structures been assessed for stormwater retrofit?	N/A
New structures include water quality considerations?	There are no facilities owned or planned but the City has passed the WQv ordinance for new construction.

Flood Management		
Interview Questions	Response	
	Applicable Documents	Reviewed Obtained
Inventory		N/A

Notes

In your Storm Water Management Plan (SWMP) you have indicated that a riparian and wetland setback ordinance would be passed within the term of the first permit. At this time, this ordinance had not been passed resulting in a violation of your permit. Please provide me with an update on your intent to implement a riparian and wetland setback ordinance. If you will not be implementing this BMP, what BMP(s) will be enacted in its place? Per Part III.D.2.b of the NPDES permit, BMPs included in the SWMP may only be deleted from your program if they are replaced with another BMP that meets or exceeds the goals of the original BMP. However, you must demonstrate why the original BMP is ineffective or infeasible and provide an analysis of why the replacement BMP is expected to achieve the goals of the BMP to be replaced.

Facilities Operation & Maintenance																			
Interview Questions	Response																		
Inventory of MS4 facilities complete (i.e. facilities owned and operated by the MS4)?	NO – An inventory of all facilities must be added to the SWMP																		
<p><u>Types of facilities included</u> <i>These need their own NPDES storm water permit for industrial activities, if there is a discharge of runoff from these operations:</i></p> <ul style="list-style-type: none"> • Landfills Type: _____ • Solid Waste Transfer Stations <ul style="list-style-type: none"> ✓ Permit needed if community owns the transfer station and the landfill where waste will be taken ✓ If not, then permit is only needed if vehicle maintenance, equipment washing or fueling activities occur at the transfer station, or if a portion of the facility is involved with recycling or composting, • Composting Operations <ul style="list-style-type: none"> ✓ No discharge of leachate permitted • Airports • Shipping Ports • Steam Electric Power Plants • Wastewater Treatment Plants ≥ 1 MGD or with a pretreatment program <p><i>These do not need their own permit:</i></p> <ul style="list-style-type: none"> • Impound Lots • 	<table border="0"> <thead> <tr> <th style="text-align: center;"><u>Response</u></th> <th style="text-align: center;"><u>SWP3 Developed?</u></th> </tr> </thead> <tbody> <tr> <td>NO</td> <td></td> </tr> <tr> <td>NO</td> <td></td> </tr> <tr> <td>NO – There is a jointly run compost facility with the City of Westlake, located in the City of Westlake</td> <td></td> </tr> <tr> <td>NO</td> <td></td> </tr> <tr> <td>NO</td> <td></td> </tr> <tr> <td>NO</td> <td></td> </tr> <tr> <td>NO</td> <td></td> </tr> <tr> <td>NO – Impounded cars are sent to a contracted facility</td> <td></td> </tr> </tbody> </table>	<u>Response</u>	<u>SWP3 Developed?</u>	NO		NO		NO – There is a jointly run compost facility with the City of Westlake, located in the City of Westlake		NO – Impounded cars are sent to a contracted facility									
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Facilities Operation & Maintenance

Interview Questions	Response
<ul style="list-style-type: none"> • Leaf Collection Yards <ul style="list-style-type: none"> ✓ No discharge of leafate permitted • Maintenance Yards <ul style="list-style-type: none"> ➤ How many do they operate? <u> 1 </u> ➤ List facility names/locations: <p>1. 31300 Naigle Rd. Gordon L. Forsmark Service Center</p>	<p>NO</p> <p>YES NO</p> <p>The City has contracted with Michael Benza and Associates to develop a SWP3 for this facility.</p>
<ul style="list-style-type: none"> • Parks <ul style="list-style-type: none"> ➤ How many in UA? <u> 5 </u> ➤ List facility names/locations: <p>1. Lakeside Cemetery – Lake Rd. No maintenance facility or storage</p> <p>2. Bradley Rd. Park – Bradley & Wolf Rd. 17 acre park with sports fields (tennis, baseball, soccer, sand volleyball), track, restrooms.</p> <p>3. Cahoon Memorial Park – Cahoon – Dover Ctr Rd. – Center of City 116 acre with sports fields, restrooms, community house, rose hill museum, Osborn historical house, rose garden, sledding hill, recreation offices, senior center, swimming pool, playground, city hall, walking trail, boat launch</p> <p>4. Columbia Park – Lake Rd. & Columbia A green space with lake access</p> <p>5. Reese Park – Clague & Wolfe Rd. Has a baseball field, tennis courts, basketball court, skating rink, and restrooms.</p>	<p>YES N/A</p>
<ul style="list-style-type: none"> • Parking Lots <ul style="list-style-type: none"> ➤ How many do they operate? <u> 13 </u> ➤ List facility name/locations: <p>Bradley Rd. Park, Service Garage, Bay Lodge at Bradley Rd. Park, Fire/Police Station, Cahoon Park Soccer Fields, Walking Trail in Cahoon Park, Sledding Hill/ Community House in Cahoon Park, City Hall, 2 Overflow lots for Swimming Pool, Dover Center Rd.</p>	<p>YES N/A</p>
<ul style="list-style-type: none"> • Bus Terminals • Vehicle Maintenance Garages <ul style="list-style-type: none"> ➤ How many do they operate? ➤ List facility name/locations: 	<p>NO</p> <p>YES – Same facility as Maintenance Yard.</p>

Facilities Operation & Maintenance	
Interview Questions	Response
Facilities inspected? Frequency:	YES There were 3 inspections of Gordon L. Forsmark Service Center last year. Starting in April 2009, there has been a monthly inspection of the facility by Don Landers.
Checklist used?	YES A checklist has been implemented in the inspection of this facility that includes sections: Road Salt, Construction Materials, Construction Debris, Grading/Drainage, Storm Sewer Inlets, Vehicles/Equipment, Non-Hazardous Waste, Containers/Dumpsters, Salt Bodies and Leaf Boxes, Service yard and Building Inspection. This inspection checklist will need to be revised to accommodate the SWP3 that will be developed by Michael Benza & Associates for this facility. The minimum inspection frequency is annually but it would be advised to continue the monthly inspections.
Staff which perform the inspections (department or agency):	Operations Manager Don Landers is responsible for carrying out the inspection but others will assist.
Is there a designated stormwater contact person for each facility?	Dave Kepic is the contact person for the service department facility.
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:	Enforcement is centered on union rules and regulations that usually involve a verbal warning, written warning, and a meeting with possible time off. So far there has been no real need for enforcement in regards to storm water pollution aside from instruction on good housekeeping practices.
Parking lots owned/operated by the permittee swept? Frequency?	NO The only time a parking lot will be swept is before a special event. This is an area the City of Bay Village may improve their MS4 program by implementing a regularly scheduled sweeping of all parking lots.
Do you have any combined sewer systems?	NO

Facilities Operation & Maintenance			
Interview Questions		Response	
If yes, do you have any combined sewer overflows? ➤ How many? _____ ➤ Do you track frequency and volume?		N/A	
Are you aware of any illicit cross connections between your sanitary sewer and MS4?		NO	
If so, what is your plan to eliminate this illicit discharge?		If there is an illicit cross connection found between the sanitary and storm sewer lines it is immediately fixed.	
Have you investigated the extent of infiltration and inflow into storm sewer system?		YES	
What methods have been used to conduct this investigation?		There are four potential overflows from sanitary sewer manholes into the storm sewer.	
What are your plans to repair and eliminate this source of illicit discharge?		The City has an on going project of dye testing all the sewer lines in the city.	
Sewer spill and cleanup procedures in place?		YES	
		The City will report the incident to the Rocky River Waste Water Treatment Plant and complete an SSO report.	
Applicable Documents		Reviewed	Obtained
Facility inventory		Does not exist	
Facility SWPPP		Does not exist	

5Notes

Facility Inventory

A Storm Water Pollution Prevention Plan (SWP3) must be developed and implemented for the following facilities:

Gordon L. Forsmark Service Center
 31300 Nagel Rd.
 Bay Village, OH

The Ohio EPA General Storm Water NPDES Permit for Small MS4s #OHQ000002 requires you to develop and begin implementing the SWP3s within 2 years of permit renewal (by mid-2011). Facilities must be inspected at least once per year and a record of the inspection and its findings must be kept with the SWP3. If this annual inspection reveals deficiencies in the SWP3 or BMPs that are ineffective, the SWP3 must be revised to correct the problems. You should continue to use the checklist but revise it as necessary.

Parking Lot Sweeping

In addition to any sweeping of lots for special events, it is recommended that municipal parking lots be swept in the Spring after snow melt has occurred to collect the road grit and debris that collects in snowbanks over winter. It is also good practice to sweep municipal parking lots in the Fall after leaf fall.

5Notes

Sources of Illicit Discharge and Elimination

Of the four overflow locations, one will be eliminated through the installation of a pump station and another one is being monitored by the city engineer so he may develop a plan for its elimination. The other two potential overflows have rarely spilled over and there is no real plan to remove them. There was an overflow in May. As part of MCM #3 there must be a plan in place to repair and eliminate these sources.

If a problem is found from dye testing, a crew will camera the pipe and determine the actual problem. The City of Bay Village's Storm Sewer pipes are shallower than the sanitary pipe resulting in very little infiltration into the storm system. Illicit connections have been recorded in the past with the West side of the City being the worst. The city fixes any leaks in the system with slip lining. There is only one septic system in the City that has been tested by the Cuyahoga County Board of Health and is functioning as designed and intended. This system could be removed in the near future when the residence is tied into a planned sanitary sewer.

Pesticides, Herbicides & Fertilizers			
Interview Questions	Response		
Certified applicators used?	YES Bob Quarick is certified by the State of Ohio		
Integrated Pest Management (IPM) practices used?	NO There have been very few problems associated with pests, which has minimized the need for pest management.		
Storage location of pesticides, herbicides, and fertilizers:	These materials are stored in the pole barn of the service garage on pallets. Most of the material is in plastic buckets but they have gone to using a 50 gallon barrel of Fertilizer.		
BMPs used during application:	Applicator documents type and amount applied, wind direction, velocity and weather conditions on inspection sheet. He always carry's a spill kit when using the 20 gallon spray tank. All drums and storage containers are clearly marked and near spill kits.		
Fertilizer/pesticide application plan utilized?	YES Fertilization is tracked by season, type of application and place of application.		
Applicable Documents		Reviewed	Obtained
Fertilizer/pesticide application plan		YES	YES

Notes

The City's licensed applicator is Bob Quarick, of the Service Department through the Ohio Department of Agriculture. He is licensed through the State of Ohio and uses mainly: Dimension (pre-emergent) and Surge (Fert./Pest.). If funds are available he will do an extra treatment of fertilizer in late summer on the soccer field for the Bay Cub Tournament.

Pesticides are rarely used and only used when absolutely needed. They were used last year when there

Notes

was a grub problem. In the future continue to limit the amount of pesticide or create a threshold number of pests that would warrant use of pesticides. Also be sure to properly identify pests and use the least invasive method as possible.

He does use a standard condition list that is filled out before every application to insure proper weather conditions. He also uses good housekeeping, always having a spill kit available and always limiting the amount that gets onto paved surfaces. The City has also developed standard operating procedures with a goal to minimize and control the amount of treatments used by the service department. In the Fertilization Program there is mention of inlet protection during application. This is an excellent BMP to use and should be implemented every application.

The storage of fertilizers is in an acceptable facility but the 50 gallon drum of fertilizer does need to be on a containment shelf to prevent any discharge.

Standards, BMPs, & Outreach

Interview Questions	Response
BMP technical guidance document available to maintenance staff?	NO
MS4 use contractual staff to complete MS4 maintenance activities?	Limited contracted maintenance work
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):	<p>Pet waste: All parks have "Doggy Bag" stations that were said to be very popular.</p> <p>Litter reduction: Around the City there are "Do Not Litter" signs that indicate a fine is possible. There are also trash cans located in the parks and public facilities that are emptied every day. To reduce litter, the green team has provided sports teams with water bottles to limit the amount of plastic bottles used.</p>

Applicable Documents	Reviewed	Obtained
BMP manual or guidance document	Does not Exist	
Contract language for MS4 operation and maintenance activities	N/A	

Notes

BMP Guidance

Currently, there are no resources available to the municipal staff on Storm Water BMPs. The City was informed on how to develop material that will let staff understand their contribution to storm water pollution and what methods they can use to limit the pollutants. This could also include binder or flip books placed in vehicles or in a locker room for easy reference. For more ideas, please consult the

Notes

Rainwater and Land Development manual (ODNR, 2006). We also recommend you review the **Municipal Pollution Prevention/Good Housekeeping Manual #9** (Center for Watershed Protection, September 2008). This manual is available as a free download on their website.

It was also noted that there has been no language in municipal contracted work to require best management practices for storm water related pollution. Please be sure to include language in contracts with contracted service providers that requires the use of storm water best management practices when conducting their activities.

Public Education and Outreach

There is a Memorandum of Understanding for public education through the Cuyahoga Soil and Water Conservation District. We also noted the display of Storm Water information near the entrance of City Hall. The Mayor of Bay Village does have a "Green Team" that has organized two stream clean-ups in 2009 and will pass out information at the Bay Day festival. Most Storm Drains are stenciled and any new storm inlet is casted with a "leads to the lake" message. 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.

Staff Education and Training

Interview Questions	Response				
Staff trained to identify potential storm water pollution sources which would result in an illicit discharges? Frequency:	YES There has been one training event in 2008 that involved ten employees. This is a Violation of your MS4 Program as you have indicated you would train staff in 2004 - 2005 in your Storm Water Management Plan.				
Materials used to train staff:	The City of Bay Village used an Ohio EPA CSU/OCAPP training DVD that covered storm water pollution prevention.				
Applicable Documents					
Training Attendance List	<table border="1"> <thead> <tr> <th align="center">Reviewed</th> <th align="center">Obtained</th> </tr> </thead> <tbody> <tr> <td align="center">YES</td> <td align="center">YES</td> </tr> </tbody> </table>	Reviewed	Obtained	YES	YES
Reviewed	Obtained				
YES	YES				

Notes

There has only been one training event during the first permit term which was done in 2008. This training did have a sign in sheet that was produced and it involved ten employees. Always make sure to document any training and continue to provide a check in list to track the number of participants. NPDES permit #OHQ000002 requires you to train staff on storm water pollution prevention at least once every year.

Notes

Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) as well as ODOT's Local Technical Assistance Program (LTAP) have 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 is archived on the internet at www.epa.state.oh.us/ocapp/storm_water.html and can be used to provide training to your staff. In addition, the Cuyahoga County Board of Health (CCBH) through the NE Ohio Storm Water Training Council is planning several pollution prevention workshops this August. Please contact Laura Travers at (216) 201-2001 at the CCBH for further information.

From: Laurie Stevenson
To: Rich Blasick
Date: 7/9/09 5:01:37 PM
Subject: ODNR/Wind Project Call Tomorrow - Correct Call-in Number

Hi Rich. I think the call-in instructions tomorrow are different from the ones I previously passed along. See below for correct information.
Laurie

>>> "Snyder, Connie" <Connie.Snyder@dnr.state.oh.us> 7/9/2009 4:15 PM >>>
Ms. Stevenson:

Below is the call in information for tomorrow's call. Please forward for those I may not have an email address.

Thank you,

Connie Snyder

Office of Legal Services

Ohio Department of Natural Resources

2045 Morse Road, D-3

Columbus, OH 43229-6693

614.265.7062

614.265.6820 - Facsimile

connie.snyder@dnr.state.oh.us <<mailto:connie.snyder@dnr.state.oh.us>>

Please note that this message and/or any attachments may contain confidential attorney work product and/or may otherwise be privileged or confidential and/or protected from disclosure by applicable law. If you are not the intended recipient, you are hereby notified that you have received this message in error. Any review, dissemination, distribution or copying of this message is strictly prohibited. If you have received this message in error, please notify the sender by reply or by telephone at 614-265-7062 and immediately delete this message and any attachments.

MS4 SWMP Evaluation
MS4 Maintenance Facility Field Inspection Worksheet
Gordon L. Forsmark Service Center

Permittee: City of Bay Village	
Address of facility: 31300 Naigle Rd.	Size of facility: 7.5 acres
Date of visit: 6/16/09	Time of visit: 11:40am
Provide the name(s) and title(s) of permittee staff present during inspection	
Name	Title
<i>James Sears</i>	<i>Director of Public Service and Property</i>
<i>Dave Kepic</i>	<i>Asst. Director of Public Service and Properties</i>
<i>Don Landers</i>	<i>Operations Manager</i>
<i>Deborah L. Sutherland</i>	<i>Mayor</i>
<i>Hugh F. Thomas</i>	<i>Michael Benza & Associates, City Engineer</i>
Evaluator Observations:	
SWPPP or stormwater plan	
Has the maintenance facility developed a SWPPP or stormwater plan?	No, Hugh F. Thomas has been hired to assist in the creation of a SWP3. The NPDES permit requires the plan to be completed and implemented by mid-2011.
Does the plan include a site map, list of pollutant sources, BMPs, and maintenance procedures?	N/A at this time, but these are required components of the SWP3 once it is developed.
Does the permittee conduct and document periodic inspections of the facility?	Yes
Are storm drains labeled and free of debris?	Yes -- Sufficient inlet protection has been placed around most storm drains. Two drains (3Y & 4Y) were uncovered and should be protected in the future.
Vehicle maintenance, fueling and washing	
Are vehicle maintenance activities conducted in a designated place not exposed to stormwater?	Yes, all drains in the maintenance building go to the sanitary sewer.
Are fueling stations properly designed with spill kits nearby?	Yes, spill kits are located in all buildings and are properly labeled.
Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer?	Yes, trucks are washed inside where sanitary sewers are located. The Vector Truck was washed outside, see notes.
Material storage	
Are all materials that are potential stormwater contaminants stored under cover or in secondary containment?	Not all containers are labeled and no containers were on containment pads. There was a pile of sand and other scrap materials uncontained and uncovered.
Hazardous waste management	
Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff?	The storage bin for catch basin cleanings and street sweepings was uncovered and leaking. This should be covered and in a fully contained bin so no leachate is discharged.
Waste management	
Are waste bins covered with waste properly disposed in containers?	Waste bins were covered and should be part of the daily inspection. The recycling bins were open on one side to allow residents to deposit material. This could be a source

	of debris if not properly maintained. Some type of fencing or containment should be installed on the open side.
How is landscape waste stored?	Landscape waste is contained with concrete blocks awaiting transport to the Westlake compost facility but is uncovered. Most storm drains in the facility are protected but one that is downhill from this storage area is not protected.

Spill response

Does the facility have a spill response plan, and are spill kits readily available?	There is no official spill response plan but there are marked spill containment bins located around the facility.
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Employee training

What type of stormwater training do maintenance staff receive?	The staff has watched an OCAPP/OhioEPA Stormwater DVD
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Notes or additional information:

Gordon L. Forsmark Service Center is the main service facility for the City of Bay Village. It includes a material storage yard, pole barn, waste transfer point, kennel, and service garage with mechanics garage. This is the only facility owned and operated by the City of Bay Village that will need to develop a SWP3 for the current permit.

West End

The West end of the facility is 90% unseeded dirt surface that includes landscape material storage, catch basin cleaning dewatering pit and dumpster, yard waste bins, scrap metal bins, and storm drains with inlet protection. There is a large amount of soil that has been accumulating over the years that has recently been pushed back to the far west end. There was an attempt to hydroseed the mound but it was unsuccessful. Hydroseed may need several application and/or straw protection. This mound needs to be seeded to reduce the amount of suspended solids that will be discharged.

The inlet protection at this side of the facility, and other areas as well, was properly installed but did not use the recommended type of geotextile material. All silt fences should be woven geotextile. The inlets were labeled but not all were protected. One inlet, located in a grassy area, was not protected but it was apparent there could be storm water pollutants entering the drain. Please make sure to protect all inlets.

The dewatering pit and dumpster for catch basin cleanings is an interim setup. Other than through infiltration and evaporation, it was not clear how spoils would truly dewater given the current setup. Some sidecasting of spoils was observed around the pit. Although this appeared to be incidental, be aware that storm water that contacts spoils is leachate and must be disposed of accordingly. The bin that holds the dewatered spoils had liquid in it and was uncovered. There was also a hole in the bottom of the bin where leachate was being discharged. The spoils should go into a covered container that is well maintained with no holes. In the future, it is recommended you build a dewatering pad that directs leachate to sanitary sewer yet allows spoils to dewater.

The scrap metal bin was uncovered and not fully contained. Any residual liquids contained in the motors and appliances could be discharged if not properly drained. This bin should be inspected frequently for leaking metals and should be covered as well.

Landscape material storage was contained with concrete blocks on three sides but many piles were spilling over. If you plan to continue to store these materials outside uncovered, please make sure all storm drains are properly protected.

This area contains 90% disturbed uncovered soil. There must be a plan to limit the amount of the disturbed soil through seeding or paving. Areas that will remain bare must be protected with sediment controls, but cannot remain bare and idle. An area is considered idle if there is no planned disturbance within the next 21 days.

The salt dome did not appear to have adequate storage for your needs. Construction of a larger or second salt dome should be considered.

When planning any improvements to the material yard, please be sure to do a wetland assessment before any construction is conducted. We noted wetland-type vegetation and wet conditions along the south side of the yard along Naigle Rd. We noted that there is old scrap material in this area that should be removed from the property and recycled.

Kennel

The kennel has drains that go to a sanitary sewer and all the waste from any animals is taken directly to a waste bin.

Pole Barn

The pole barn had drains that went to the sanitary sewers but many of the vehicles in the building were leaking. It is a good house keeping practice to put a drip pan or absorbent pad under any leaking vehicles temporarily until maintenance occurs. Outside of the barn was a covered area where salt beds were located during the summer months. Under these were many leaks that were not contained and could be susceptible to rain wash out. In the future place drip pans under these and make sure to inspect frequently for leaks.

Salt Dome

At the time of our visit, the salt dome was a three walled garage that did not contain all the salt. The salt had been tarped and a perimeter of straw bales was placed around the tarp. The tarp did not cover all of the salt and it was noted that salt was deposited past the containment. This was not an ideal containment but was better than none. In the future plan for the addition of a salt dome on site.

Transfer Point

This was going to be a licensed waste transfer station but was not needed and therefore never turned into a transfer station. All the trash from the parks is placed into a BFI dumpster that was located in this facility. The trash is removed approximately every 1 to 2 weeks as needed. There were also 50 gallon barrels of mechanics grease that was unlabeled and not on containment. The tire pile in the back was for the county wide tire round up in September. There were also florescent bulbs stored in the back of the facility. Outside of this facility was an area where the street sweeper was washed. The sweeper should never be washed outside; please wash this in an area where sanitary sewers are available.

Mechanics Garage

The used oil container was properly labeled and contained. All drains at this facility go to an oil separator and then to the sanitary sewers. The oil separator has been cleaned out every two to three years as needed. The oil drums and liquid materials need to be stored on containment pads and properly labeled. This should be part of the monthly inspection. City vehicles were washed in this facility but it was noted that there was a white residual in the drain of the building which could have been white latex paint. We inspected the North East corner storm sewer, which was unprotected, and is the final point of discharge for the storm sewer network on this site. This storm drain contained an ample amount of debris and should be protected.

City of Bay Village Municipal Operation Photos

Gordon L. Forsmark Service Center

Location: 31300 Naigle Rd.

Date Photos Taken: 6/16/09

Taken By: Lindsie MacPherson

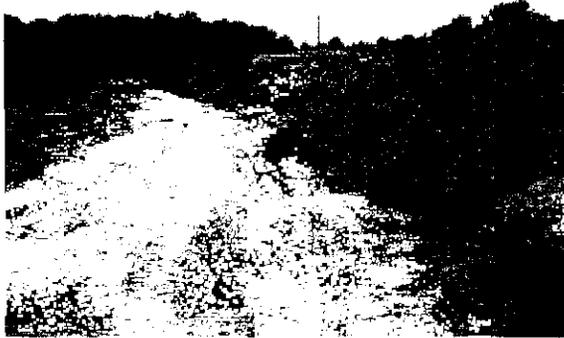


Fig 1 (Left) The mound of soil has been pushed against the west side of the facility but is still unseeded. There was an attempt with hydroseed but it will need several applications and may require straw protection.

Fig 2 (Right) This is the inlet protection for the west side of the facility. The material that is on the inlet protection is not sufficient and should be replaced with a woven geotextile.



Fig 3 (Left) The dewatering pit for catch basin cleanings has debris around the side that should be put in the dumpster. The curbing for this pit should be build up as well to limit the amount of material that could be discharged.

Fig 4 (Right) The BFI dumpster for the catch basin debris and street sweepings had a significant amount of leachate and did have a hole in the bottom where the liquid was discharging. Your storm water permit does not authorize the discharge of leachate.



Fig 5 (Left) Metal and other scrap is stored just above an area that may be a wetland. This material should be relocated and the wetland protected from sediment-laden runoff. Silt fence or other perimeter control should be installed along the wetland until the material yard is stabilized.



Fig 6 (Right) The salt dispensing beds are stored undercover but are not totally protected from the elements. They are also leaking and could discharge these liquids to your MS4. Drip pans should be placed underneath the dispensing parts and maintenance should be performed to prevent dripping from occurring.



Fig 7 (Left) The salt storage facility is not adequately containing the City's salt supply. To fix this problem, tarps and straw bales have been placed around to reduce erosion. It should be noted that salt deposits are visible around this area and going to the drainage area. This should be inspected daily.



Fig 8 (Right) Outside of the Transfer Station was the Street Sweeper washout area. This area had catch basin cleaning debris on the ground that will be washed away in a storm event. Vehicles should never be washed outside and instead be washed where sanitary sewers are available.