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CUYAHOGA SEVEN HILLS

CITY OF SEVEN HILLS

3GQ00110 2009/07/27

SAFRANEK,  
KENNETH

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State of Ohio Environmental Protection Agency

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

July 24, 2009

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

Mr. Mark K. Papke  
Storm Water Program Coordinator  
City of Seven Hills  
7325 Summitview Dr.  
Seven Hills, OH 44131

Dear Mr. Papke:

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) OHQ000110\*AG and Ohio Administrative Code 3745-39. On June 30, 2009, Ohio EPA met with you and other representatives of the City of Seven Hills 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 prevent discharge of (a) wastewater from dewatering operations of solid waste and (b) erodible piles of landscape material.** This is a violation of Part I.C.5 and Part III.B.6.d.iii.2 of the Ohio EPA General Storm Water NPDES Permit for Small MS4s #OHQ000002. (a) The dewatering area for catch basin cleanings leads directly to the storm sewers. A TRITON catch basin insert is used to collect any solids entering the storm sewer. This insert does not treat waste water and does not prevent an illicit discharge of leachate. This drain should be plugged until a permanent solution can be implemented. All waste water should go to the sanitary sewer system. (b) At the Calvin Park Service Garage piles of erodible landscape material were uncontained and contaminated water was washing away off site during the inspection. The drainage of these piles should be directed towards the TRITON insert designed to filter suspended solids.

Deficiencies:

Mr. Mark K. Papke  
City of Seven Hills  
July 24, 2009  
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- The SWP3 for the Calvin Park Service Garage displayed a false drainage pattern. It had indicated water would flow to a TRITON catch basin insert but on review of the site, water was draining off site on the Northeast corner.
- Your Facility Storm Water Checklist could be improved by including tangible comments that indicate specific events, i.e. for the dirt and grease buildup section a comment of "ongoing cleanup" was written. This does not answer how much, where, or when clean up has taken place. All comments should pertain to the most recent action taken place to remediate the issue being evaluated.
- BMPs that have been implemented are not maintained properly. Several TRITON inserts were impaired during our inspection of the Broadview Service Garage and the Calvin Park Service Garage. A drain outside of the maintenance garage was filled with soil and a visible sheen was seen bypassing the inserts treatment apparatus. The Calvin Park Service Garage had a catch basin insert that was also at capacity allowing suspended solids to flow straight to the storm sewers. Please prioritize cleaning of these inserts to insure proper filtration.
- 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.

Please review my comments and provide me with a letter of response indicating the actions you will take to address my concerns. **Your response should be received no later than 30 days after date of letter.** Please note that this response does not replace the requirement to submit an Annual Report.

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

Sincerely,



Kenneth Safranek  
Assistant to the District Engineer  
Division of Surface Water

KS/mt

cc: Richard A. Pgnatiello, Law Director, City of Seven Hills  
Mayor David A. Bentkowski, City of Seven Hills

# Municipal Storm Water Program Evaluation

## MS4 Maintenance Component Worksheet

<b>Date of Evaluation</b>	6/30/2009
<b>Evaluator Name, Title</b>	<b>Kenneth Safronek</b>
<b>MS4 Permittee</b>	<b>City of Seven Hills</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.

<b>Staff Interviewed</b>		
<b>Name</b>	<b>Department/Agency</b>	<b>Phone Number/Email</b>
Mark Papke City Engineer	City of Seven Hills	216/525-6226
Bill Bishilany Service Director	City of Seven Hills	216/525-6224

<b>MS4 Mapping</b>		
<b>Interview Questions</b>	<b>Response</b>	
Outfalls and receiving waters mapped?	<b>YES</b>	
Catch basins?	<b>NO</b>	
Pipes, ditches, other conduits?	<b>NO</b>	
Public stormwater facilities (BMPs)?	<b>NO</b>	
Private stormwater facilities (BMPs)?	<b>NO</b>	
How are maps used (i.e. tracking illicit discharges)?	The city has an MOU with CCBH to sample outfalls and do dry weather screening. The map is used as a reference if a test results in a fecal coliform reading above 5000 colonies. It is also used as a reference for residential complaints to track possible illicit discharges.	
<b>Applicable Documents</b>		<b>Reviewed</b>
Map(s) of MS4 system		<b>YES</b>
		<b>Obtained</b>
		<b>YES</b>

<b>Notes</b>
Mapping obligations of #OHQ000001 have been met. The city has entered into a MOU with the Cuyahoga County Board of Health to sample and identify locations and discharges. The city has recently invested in Topcon GRS1 equipment and software to re-identify locations of outfalls, pipes, ditches, and stormwater facilities more accurately. This will also allow the City to create layers and data files in ArcGIS to compile all the mapping data that they have accumulated. There are currently 69 known outfalls in the City of Seven Hills.

<b>Notes</b>
<p>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. The City is already in the process of completing this requirement with their GRS1 Program.</p>

<b>Catch Basin Cleaning</b>		
<b>Interview Question</b>	<b>Response</b>	
Schedule established for inspections and cleaning?	YES	
Is cleaning and maintenance of catch basins tracked:	YES	
How are spoils materials disposed of?	Material is deposited into a concrete dewatering pit where it is dried and then placed into a trash bin. The drain in the concrete dewatering area is connected to the storm sewer and is protected by a TRITON Drop Inlet. This results in an unauthorized discharge of wastewater to the MS4. See Notes.	
Are storm drain pipes inspected?	YES	
Proactive or only in response to blockage event?		
<b>Applicable Documents</b>	<b>Reviewed</b>	<b>Obtained</b>
List of active municipal construction projects	No	No
<b>CHECK DATABASE BEFORE INSPECTION:</b>		
List of municipal projects covered under the Ohio EPA general storm water NPDES permit for construction activities	None	
<b>NOTE:</b> Permit is only required if project disturbs 1 or more acre (5 or more acres for "routine maintenance")		

<b>Notes</b>
<p><b>Catch Basin Cleaning</b></p> <p>The City of Seven Hills owns a vactor truck that is used to clean catch basins on a daily basis. It usually takes the crew about two years to finish cleaning all the catch basins in the city. For example, cleaning crews cleaned 169 catch basins in 2006. The Service Director is currently working with the crews to computerize all the cleanings to have one consolidated record of all the cleanings that have taken place. A written inventory of the catch basins that have been cleaned that day are kept in the Service Department. If there are any pipes that need to be cleaned they will be cameraed and recorded with the City's GRS1 equipment.</p> <p>The dewatering pad has a concrete base that empties into a stormwater catch basin. This pad is in good condition and contains all of the catch basin waste water runoff. However, the catch basin insert is not designed to treat or remediate wastewater. This has resulted in an unauthorized discharge of</p>

wastewater in violation of Ohio Revised Code 6111.04 and your illicit discharge program. To remediate this problem the city can extend a sanitary sewer line to this catch basin. There should be a cover or some sort of shut off valve to prohibit regular storm water from entering the pit. This could mean that the pit area, because it is shallow, should be covered at all times. Another method to remediate this problem is to remove or plug the storm drain in the dewater area. When wastewater has collected in the pit, it should be pumped to a sanitary sewer. In this case as well as the first suggestion, there should be a cover over the dewatering pit to minimize the generation of wastewater that can overflow into other storm drains.

**MS4 System Repair and Maintenance**

The City had just finished a replacement project of 62 catch basins and an EPA sanctioned sanitary sewer connection project. The city has these type of projects contracted out to private businesses. If there is a complaint, the city has the ability to camera the pipes and determine the problem. There is also a proactive cleaning of catch basins before predicted large storm events.

**Catch Basins in the Broadview Rd. Service Garage**

All the catch basins in the Service Garage, including the driveway leading to Broadview Rd, have been retrofitted with Revel Environmental Manufacturing's TRITON Drop Inlets. These inlets will trap large debris and many other common stormwater pollutants including oil. The Service Garage is an open facility but is roofed. It was built in the late 1950's and does not have a sanitary sewer connection. For this reason, the installation of the storm drain protection is a good practice. During the inspection, there was a small rain event that was able to bypass the filter through the overflow throat of the inlet included. This was due to a build up of debris along the sides of the inlet. As we went through the inspection, these inlets were noted and should be prioritized for a weekly inspection and frequent cleaning. As per the reading material obtained at the interview, it is recommended that the filter medium be replaced when the beads are 50% coated with contaminants. Please be sure to do frequent inspection and replacement of filter medium to ensure these devices are working properly.

<b>Stormwater Management Facilities Operation and Maintenance</b>			
<b>Interview Questions</b>	<b>Response</b>		
Public facilities inspected?	YES		
Frequency:	The Service Department checks the public facilities annually.		
Private facilities inspected?	YES		
Frequency:	There is an agreement with the Cuyahoga Soil and Water Conservation District to inspect several facilities. There are also maintenance agreements with developers to inspect all other facilities.		
Checklist used for inspections?	NO		
Have maintenance standards and procedures been established for these facilities?	YES		
How is maintenance prioritized? Is data evaluated to target maintenance resources?	YES		
<b>Applicable Documents</b>		<b>Reviewed</b>	<b>Obtained</b>
Inspection checklist		None existed	

**Notes**

**Public Stormwater Management Facilities:**

In the City of Seven Hills there are seven stormwater management facilities. These facilities are all in developed residential areas and were all constructed prior to 2003. There has been no checklist developed for these facilities. In the future the City should develop a checklist in order to ensure a standardization of inspections over the course of many years. Additionally, these facilities could be important retrofit opportunities if there is any development or redevelopment in the future.

**Private Stormwater Management Facilities:**

There are five private facilities located in the City limits. Three of the five facilities have been built after 2003. These are the West Longridge/North Skyline, River Trace South, and River Trace North locations and are maintained by the developer in each instance. In addition, a development of a Panera Bread and Aldi's Store, built after 2003, installed bioretention cells. The two bioretention cells are inspected by the Cuyahoga Soil and Water Conservation District.

**Stormwater Taskforce**

The City of Seven Hills has developed a stormwater taskforce that has been meeting monthly since March 2007. This taskforce is made up of members of the department of engineering and service department. The group will coordinate efforts and talk about areas of improvement or retrofit opportunities. The City is more than 90% built on so it is important for this task force to recognize retrofit opportunities where water quality can be improved in new development and redevelopment of old sites.

**Road Maintenance**

<b>Interview Questions</b>	<b>Response</b>
Streets regularly swept?	YES
Frequency:	Streets are swept every day beginning in May starting on the South side of the City to the North side.
Frequency based on water quality factors (e.g. proximity to streams)?	Most of the city is residential and has only one pocket of commercial development. Water quality factors are considered on highly trafficked roads and are done more frequently.
How are spoils disposed of?	Spoil material is put in a dumpster and taken away to a landfill once a month. This dumpster is shared with tree cutting and yard waste.
Does the community collect road kill?	YES
What do they do with the carcasses?	The City will put any road kill into a dumpster where it will be taken to a landfill. The City was told that they could also take it to a Class II composting facility, the closest one being Rosby's in Brooklyn Heights.
Does the community have a leaf collection program?	YES

<b>Road Maintenance</b>		
<b>Interview Questions</b>	<b>Response</b>	
<p>What do they do with the collected leaves?</p> <p><b>NOTE:</b> Communities may temporarily store leaves awaiting transport to a composting facility but leafate must be prevented from discharging.</p>	<p>Leaves are collected for a three month period at the start of fall. Trucks vacuum the leaves and take them directly to Rosby's in Brooklyn Heights. There is also a Christmas tree collection program that follows the same procedure.</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>YES</p> <p>The City of Seven Hills does their own crack sealing and hot patching. All other work is contracted out. During these activities silt fence may be wrapped around the inlet grates and the weather is always considering. Streets are also swept before and after work is done. A detack that prohibits tracking is used for crack sealing.</p>	
<p>BMP guidance available to field staff?</p>	<p>NO</p>	
<p>Deicers used by MS4?</p>	<p>YES</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>YES</p> <p>The City uses Road Salt (NaCl) with no solid additives. They have started pre-treating hills with brine to improve their salting effectiveness. The City has also started using sensible salting practices where they only treat hills, turns, and intersections. There has been a decline in salt usage by several thousand tons.</p>	
<p>Sand/salt swept up after application?</p> <p>How soon?</p>	<p>YES</p> <p>Salt is swept back into the bins after an event. There have been no documented spills from any of the trucks. There are tarps that cover both bins to reduce the salt piles exposure to the elements. Purchasing of salt is also done in accordance with need to reduce the amount of salt that will be stockpiled over the non-winter times of the year.</p>	
<b>Applicable Documents</b>	<b>Reviewed</b>	<b>Obtained</b>
BMP guidance	Does not exist	
Street sweeping records	Old Records	No
Deicer application records	Yes	Yes

<b>Notes</b>
<p><b><u>Street Sweeping Program</u></b></p> <p>There are hand written records of the street sweeping but in the future there will be efforts to track all these sweepings electronically. In 2008 there were 75 cubic yards of street sweeping debris collected and taken to the landfill. The sweeping is done by a mechanical sweeper. The street sweeping program can be improved by using a vacuum sweeper which typically are more effective than mechanical sweepers.</p>
<p><b><u>Deicer Application</u></b></p> <p>Tracking of application is done by subtracting the amount left from the amount purchased. It can be helpful to reduce the amount of salt used by tracking the amount of truck loads that are used during a storm event. In accordance with sensible salting practices, there should be attainable goals in place that reduce the percentage of salt that is applied to the roads. In addition, the new permit #OHQ000002 requires you to track the amount and type of deicer that is being applied to the streets. Be sure to track the amount of brine that is also applied along with salt.</p>
<p><b><u>BMP; Available to Staff During Road Maintenance</u></b></p> <p>Several best management practices are used during the few road maintenance activities the City conducts. It was noted that the employees will wrap storm drains with silt fence as a stormwater prevention measure. In addition there could be BMP guidance material, in the form of a binder, to improve staff awareness of possible stormwater pollution they could be created and ways they can limit their pollution creation.</p>

<b>Flood Management</b>			
<b>Interview Questions</b>		<b>Response</b>	
Inventory of flood management structures completed?		YES	
		The city owned and operated facilities were built before the Phase II permit was effective.	
Structures been assessed for stormwater retrofit?		YES	
		The Somerset facility and Overlook Subdivision were assessed for a stormwater retrofit by the Stormwater Taskforce.	
New structures include water quality considerations?		YES	
<b>Applicable Documents</b>		<b>Reviewed</b>	<b>Obtained</b>
Inventory		YES	YES

<b>Notes</b>
<p><b><u>Retrofit Opportunities</u></b></p> <p>The City of Seven Hills is built out to a large extent and has very limited development plans. For this reason it is important to look for retrofit opportunities at the seven existing public facilities. In addition, road repair and maintenance projects create opportunities for retrofit with permeable pavement, bioretention cell, or other similar water quality consideration as planned for the Broadview Road streetscape project.</p>

Facilities Operation & Maintenance		
Interview Questions	Response	
Inventory of MS4 facilities complete (i.e. facilities owned and operated by the MS4)?	YES	
<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>	The inventory is a aerial photo of each of the two facilities included as part of the SWP3	
	<u>Response</u>	<u>SWP3 Developed?</u>
• Landfills Type: _____	NO	N/A since do not operate
• Solid Waste Transfer Stations	NO	N/A since do not operate
✓ 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, <b>or</b> if a portion of the facility is involved with recycling or composting,		
• Composting Operations	NO	N/A since do not operate
✓ No discharge of leachate permitted		
• Airports	NO	N/A since do not operate
• Shipping Ports	NO	N/A since do not operate
• Steam Electric Power Plants	NO	N/A since do not operate
• Wastewater Treatment Plants ≥ 1 MGD or with a pretreatment program	NO	N/A since do not operate
<b>These do not need their own permit:</b>		
• Impound Lots	NO	N/A since do not operate
• Leaf Collection Yards	NO	N/A
✓ No discharge of leafate permitted		
• Maintenance Yards	YES	YES
➤ How many do they operate? <u>  1  </u>	The City of Seven Hills has developed a SWP3 for the Broadview Service Garage by the City Engineer.	
➤ List facility names/locations:		
<b>Broadview Service Garage</b> <b>7355 Broadview Rd.</b>		
• Parks	YES	N/A
➤ How many in UA? <u>  5  </u>		
➤ List facility names/locations:		
<b>Valleywood Park</b> <b>Orchard View/Broadview</b> <b>Tennis court, Baseball Field, Sand Volleyball,</b> <b>Playground, Concession Stand, Restroom</b> <b>Calvin Park</b>		

<b>Facilities Operation &amp; Maintenance</b>	
<b>Interview Questions</b>	<b>Response</b>
<p>Mapleview 3 Baseball Fields, Playground, Playground, Concession Stand, Restroom</p> <p>John Glenn Park Dartmouth/John Glen Elementary School Tennis Court, Baseball Field, Playground</p> <p>North Park Rockhaven/Snow Rd. Baseball Field, Sand Volleyball, Playground, Basketball Court</p> <p>Cricket Park Cricket Dr. Playground</p> <ul style="list-style-type: none"> <li>• Parking Lots <ul style="list-style-type: none"> <li>➢ How many do they operate? <u>  4  </u></li> <li>➢ List facility name/locations:</li> </ul> </li> </ul> <p>City Hall, Valleywood Park, Calvin Park, North Park</p> <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? <u>  1  </u></li> <li>➢ List facility name/locations:</li> </ul> </li> </ul> <p>Calvin Park Garage 2241 Mapleview Dr.</p>	<p>YES</p> <p>N/A</p> <p>NO</p> <p>YES</p> <p>N/A</p> <p>NO</p>
Facilities inspected?	YES
Frequency:	The Broadview Service Garage was inspected on 10/22/08, 3/23/09, and 6/8/09. These inspections are scheduled to be completed quarterly.
Checklist used?	<p>YES</p> <p>The City has received and edited the sample Ohio EPA checklist for their facility. We received a copy of this checklist that had been completed on 3/23/09 by Bill Bishilany. The checklist indicates that almost all the debris, stains, dirt/grease build up, and any other possible stormwater pollutant are being routinely cleaned up or cleanup is ongoing. To make this list more effective, there should be tangible comments about each one of these sections instead of ambiguous statements. When clean up</p>

<b>Facilities Operation &amp; Maintenance</b>	
<b>Interview Questions</b>	<b>Response</b>
	is ongoing, comments should reflect what was cleaned up or what has been done to lessen the amount of spills.
Staff which perform the inspections (department or agency):	Members of the Stormwater Taskforce will be doing the inspection, namely Bill Bishilany and Mark K. Papke.
Is there a designated stormwater contact person for each facility?	YES  Bill Bishilany, the service director, is the designated stormwater contact person for the Broadview Service Garage.
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?	YES  Parking lots are swept in accordance with the regular street sweeping schedule. They will also get swept for any special event.
Do you have any combined sewer systems?  If yes, do you have any combined sewer overflows? <ul style="list-style-type: none"> <li>➤ How many? _____</li> <li>➤ Do you track frequency and volume?</li> </ul> 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?	NO  N/A    YES  There have been several illicit cross connections found throughout the city including one this past year. The standard procedure to fix this problem is to give the homeowner a time period to remediate the problem.
Have you investigated the extent of infiltration and inflow into storm sewer system?	YES  There has been investigation but the City is not aware of the extent of infiltration and inflow in

<b>Facilities Operation &amp; Maintenance</b>			
<b>Interview Questions</b>	<b>Response</b>		
What methods have been used to conduct this investigation?	their MS4  The City pays the Regional Sewer District to inspect five miles of sanitary sewers to look for illicit connections, infiltration/settling and possible overflows. The Storm Sewer System should have a similar inspection.		
What are your plans to repair and eliminate this source of illicit discharge?	Seven Hills has passed an Ordinance that outlines the procedures and powers to fix illicit discharges into the MS4.		
Sewer spill and cleanup procedures in place?	YES  There is a CSO form that outlines the procedures for sewer clean up and the fire department has an emergency response plan.		
<b>Applicable Documents</b>		<b>Reviewed</b>	<b>Obtained</b>
Facility inventory		Yes	Yes
Facility SWPPP		Yes	Yes

<b>Notes</b>
<p><b>Facility Inventory</b></p> <p>A Storm Water Pollution Prevention Plan (SWP3) has been developed and implemented for the following facilities:</p> <p>Broadview Service Garage 7355 Broadview Rd.</p> <p>Calvin Park Garage 2241 Mapleview Dr.</p> <p>The Ohio EPA General Storm Water NPDES Permit for Small MS4s #OHQ000002 requires facilities to 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. The SWP3 should contain a checklist to provide consistency to facility inspections.</p> <p>The SWP3 has been developed for these two facilities. The SWP3 includes a site map with storm drains and flow of storm water. The main BMP that has been implemented via the SWP3 are the TRITON storm drain inserts. In addition, there is an attached document that lists many BMP's for illicit discharge, spill prevention, outdoor equipment, outdoor material storage, waste disposal, vehicle washing, maintenance areas, and fueling areas. The practices that are indicated in this document should be followed at all times. Procedures mentioned, such as inspection of storm inlets after storm events should be documented. The Calvin Park Garage site map was incorrect in showing where storm water that hits the site drains to. Either the site map should be changed to indicate flow offsite or the grade of the area should be changed to mimic the site map.</p>

<b>Notes</b>
<p><b>Illicit Discharge</b></p> <p>The City of Seven Hills has developed an ordinance to remediate illicit cross connections. They will inform the homeowner that there is an illicit connection and it will need to be fixed within three months. If there is no action taken the City has the ability to take the homeowner to court and get a mandate issued to the homeowner. There are several court cases the City is involved with that deal with an illicit connection.</p>

<b>Pesticides, Herbicides &amp; Fertilizers</b>			
<b>Interview Questions</b>	<b>Response</b>		
Certified applicators used?	YES – Davey Tree		
Integrated Pest Management (IPM) practices used?	NO		
Storage location of pesticides, herbicides, and fertilizers:	The only materials that are kept on site are some herbicides for municipal lots.		
BMPs used during application:	As per Davey Tree’s application plan		
Fertilizer/pesticide application plan utilized?	YES		
<b>Applicable Documents</b>		<b>Reviewed</b>	<b>Obtained</b>
Fertilizer/pesticide application plan		No	No

<b>Notes</b>
<p><b>Fertilizer Application</b></p> <p>The City has a contract with the Davey Tree Company to fertilize the baseball fields and the soccer fields. Parks are fertilized twice a year. In any contract with the Davey Tree Company please be sure to include language that states any application or applicator will have to use appropriate storm water BMP’s during the application, e.g., sweeping up fertilizer overspread to pavement, dry clean-up methods when spills occur, application only in amounts needed and when appropriate weather conditions exist. If any fertilizer or similar material is to be housed at the Service Garage, ensure that it is on secondary containment pads and undercover.</p>

<b>Standards, BMPs, &amp; Outreach</b>	
<b>Interview Questions</b>	<b>Response</b>
BMP technical guidance document available to maintenance staff?	NO
MS4 use contractual staff to complete MS4 maintenance activities?	YES
BMP guidance materials provided to contracted staff?	NO
Requirement to consider stormwater impacts and utilize appropriate BMPs in contracts?	YES
Materials used to educate the public regarding stormwater impacts on MS4 property (if applicable,	Pet waste: Calvin Park and the walking trail include pet waste stations. Other parks include

<b>Standards, BMPs, &amp; Outreach</b>			
<b>Interview Questions</b>		<b>Response</b>	
i.e. public spaces):		signs that indicate no pets are allowed.	
		Litter reduction: There are recycling and waste bins at every park. During the non-winter months the bins are emptied daily and the recycling is emptied.	
<b>Applicable Documents</b>		<b>Reviewed</b>	<b>Obtained</b>
BMP manual or guidance document		No	No
Contract language for MS4 operation and maintenance activities		Yes	No

<b>Notes</b>
<p><b>Technical Guidance to Staff and Contractors</b></p> <p>The City of Seven Hills has used the Toolbox talks to instruct staff on possible stormwater pollutants and their prevention. These were given in the form of handout but it is very likely the staff does not have these available. It was suggested that there be applicable stormwater pollution prevention documents available in the Service Garage or in some of the equipment used to do street sweepings or road maintenance. Much of the road maintenance work is done through contracted work. Because of this, there should be language that indicates BMP's for the type of work that is being done. The City does mandate stormwater prevention in any site plan that is submitted to the contracted staff. For more ideas, please consult the <b>Rainwater and Land Development</b> manual (ODNR, 2006). We also recommend you review the <b>Municipal Pollution Prevention/Good Housekeeping Manual #9</b> (Center for Watershed Protection, September 2008). This manual is available as a free download on their website.</p> <p><b>PIPE Program</b></p> <p>The City of Seven Hills has contracted with the Cuyahoga Soil and Water Conservation District to assist in parts of the public involvement and outreach program. The City themselves has held a rain barrel workshop where 11 rain barrels were raffled off to residents who attended. There were over 200 residents that participated in this event. To follow up with this event, the City is offering the rain barrel and downspout disconnect to the residents for a fee. More than 20 residents have expressed interest in a barrel and have ordered at least one. The City has also set up Project R.A.I.N, Residents Acting in Nature Preservation.</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 Village 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.</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 discharges?	YES
Frequency:	The City service crew has been involved in one

<b>Staff Education and Training</b>			
<b>Interview Questions</b>		<b>Response</b>	
Materials used to train staff:		training workshop in December of 2007. The Stormwater Taskforce members held a workshop where they used materials available to them via the Toolbox Talks to train staff in several areas of the NPDES Phase II Permit.	
<b>Applicable Documents</b>		<b>Reviewed</b>	<b>Obtained</b>
Training materials		YES	YES

<b>Notes</b>
<p><b>Staff Training</b></p> <p>The Engineering Department has gone to several NPDES Phase II Small MS4 Permit workshops given by Cleveland State, LTAP, and the Cuyahoga Soil and Water Conservation District. The Service crew attended the workshop put on by the SWTF where they were instructed in the City's Permit, MCM #6, SWP3's, inspections, training, deicing practices, illegal dumping, SSO reporting, and a questions session. In the future the City plans on doing an annual training for employees during the winter months when work is slow.</p> <p>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 but we recommend you keep supplemental training of staff throughout the year as necessary.</p> <p><b>For Additional Training Information:</b></p> <p>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 <a href="http://www.epa.state.oh.us/ocapp/storm_water.html">www.epa.state.oh.us/ocapp/storm_water.html</a> 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.</p>

**MS4 SWMP Evaluation**  
**MS4 Maintenance Facility Field Inspection Worksheet**  
**Broadview Service Garage**

<b>Permittee:</b> City of Seven Hills	
<b>Address of facility:</b> 7355 Broadview Rd.	<b>Size of facility:</b> 1.8 acres
<b>Date of visit:</b> 6/30/09	<b>Time of visit:</b> 12:30
<b>Provide the name(s) and title(s) of permittee staff present during inspection</b>	
Name	Title
<b>Mark K. Papke</b>	<b>City Engineer</b>
<b>Bill Bishilany</b>	<b>Service Director</b>
<b>Evaluator Observations:</b>	
<b>SWPPP or stormwater plan</b>	
Has the maintenance facility developed a SWPPP or stormwater plan?	Yes, the engineering department has developed a plan for this facility
Does the plan include a site map, list of pollutant sources, BMPs, and maintenance procedures?	The Narrative of the SWP3 does not include an inventory of possible exposed pollutants and should be amended. BMP's and maintenance procedures are indicated and sufficient.
Does the permittee conduct and document periodic inspections of the facility?	Yes – There are quarterly inspections of the facility.
Are storm drains labeled and free of debris?	Storm drains are labeled and have TRITON drop-in filters. Several of the high debris areas had storm drain inlets that were full of debris. See Notes.
<b>Vehicle maintenance, fueling and washing</b>	
Are vehicle maintenance activities conducted in a designated place not exposed to stormwater?	Maintenance is done in a bay of the facility that is connected to the sanitary sewers and it graded to limit any water from going out of the facility.
Are fueling stations properly designed with spill kits nearby?	YES, fueling station has all proper equipment and labels.
Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer?	Vehicles are washed on-site in a designated area where the drain goes to the sanitary sewer. Be sure that all wash water is received by the sanitary drain and no water is collected by the storm drain outside of the garage.
<b>Material storage</b>	
Are all materials that are potential stormwater contaminants stored under cover or in secondary containment?	Erodible stockpiled material was under tarps but some needed to be replaced. There was no containment for barrels of possible pollutants.
<b>Hazardous waste management</b>	
Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff?	Used oil needs to be labeled "Used Oil." Labels were on all hazardous material.
<b>Waste management</b>	
Are waste bins covered with waste properly disposed in containers?	The bin that held catch basin cleanings needs to be covered. Other trash containers did have holes in the bottom that should be plugged or bins should be replaced with ones in good condition.
How is landscape waste stored?	Landscape waste stored at another facility.
<b>Spill response</b>	
Does the facility have a spill response plan, and are spill kits readily available?	There were three spill kits that were available and labeled in centralized locations. There was no official spill

	response plan.
<b>Employee training</b>	
What type of stormwater training do maintenance staff receive?	In December of 2007 the maintenance staff was trained by the Stormwater Taskforce using the Toolbox talks.

**Notes or additional information:**

**Salt Storage facility**

The salt storage facility included one large, three sided storage bin that had been tarped. The tarp had recently been torn off by severe weather but this has never happened in the past. Continue to use this tarp to protect the pile from weather erosion. Any additional salt that is outside of the salt bins should be swept back inside the bin during the non-winter months and after application events in winter.

**Dewatering Pit**

The dewatering pit was a concrete pit with a storm drain in the middle. Once dewatered, the catch basin cleanings are placed into a dumpster and taken to the landfill. The drain in the middle of the pit has a TRITON drop inlet filter that catch hydrocarbons and suspended solids. It is not designed to treat or collect leachate or wastewater that will be leaching from the catch basin cleanings. This should be plumbed to the sanitary sewer or plugged and pump any waste water to the sanitary sewer. As this operation is now, it is a violation of your NPDES permit and must be corrected.

**Roofed Storage Area**

The roofed part of the storage area included most vehicles, hazardous material, and many drums of liquid material, as well as miscellaneous material. This area had numerous spills, leaks, and staining apparent from vehicles or leaky drums. There is oil dry and spill cleanup materials located at this facility but under-utilized. The amount of spills and stains present stormwater pollution potential and should be a priority for clean up and prevention. Your good house keeping program could be improved by setting goals for spill prevention and clean up. Additionally, the storage containers for any liquid substance should be on containment pads, including the storage tanks of used oil.

**Storm Drains**

The storm drains are protected by the TRITON drop inserts but need to be inspected more frequently than previously indicated. Several of the storm drains were full of debris and we witnessed an oily sheen being washed down the drain, bypassing the filter due to the amount of debris the insert had already collected. The BMP implementation should be revised to prioritize maintenance for any insert that collects debris rapidly.

## City of Seven Hills Municipal Operation Photos

### Broadview Service Garage

Location: 7355 Broadview Rd.

Date Photos Taken: 6/30/2009

Taken By: Lindsie MacPhearson, DSW-NEDO



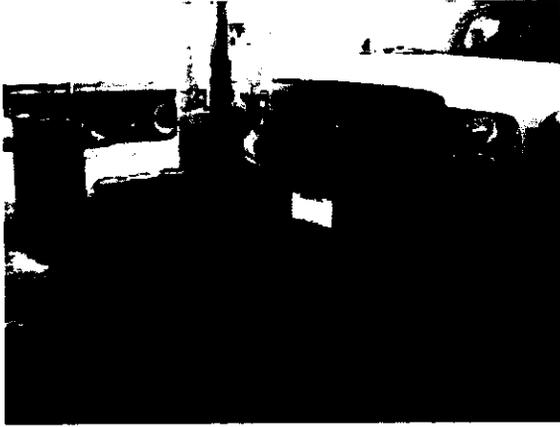
**Fig 1 (Left)** The Salt Storage Bin is protected but it does have salt that is spilling out of the side. This salt should be swept back into the bin as a good housekeeping measure.

**Fig 2 (Right)** The dumpster in this picture had a hole in the bottom and it looked as if something had been staining the ground. In the future, these dumpsters should be plugged at all times with lid on them. If water accumulated, that water should be pumped out to a sanitary sewer.



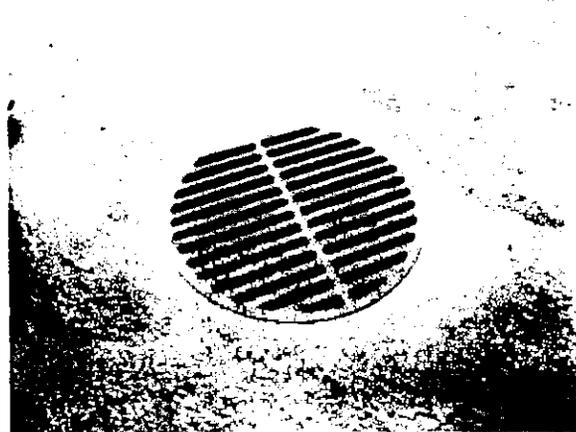
**Fig 3 (Left)** This is the dewatering pit's catch basin. The basin is clear of debris but is not designed for the treatment of wastewater.

**Fig 4 (Right)** The dewatering pit used by the City of Seven Hills is in good condition and will be a good BMP to collect wastewater from the catch basin cleaning once the drain is connected to the sanitary sewer or is plugged. The close proximity of the garbage bin is a good practice as well. However, the dumpster should be covered.



**Fig 5 (Left)** In the roofed area of the Service Garage there are many spills as indicated in this picture. This spill should be cleaned up as soon as it happens.

**Fig 6 (Right)** A set of potential stormwater pollutants are sitting out on the ground but should be stored on a containment pad. Either these containers were leaking or another container previously here was leaking.



**Fig 7 (Left)** These containers are all properly labeled but are not on containment pads.

**Fig 8 (Right)** This is the storm drain outside of the maintenance bay of the Service Garage. The drain was filled with debris and there was an oily sheen that was bypassing the TRITON filter pack and being flushed down the drain. This drain needs immediate cleaning.

**MS4 SWMP Evaluation**  
**MS4 Maintenance Facility Field Inspection Worksheet**  
**Calvin Park Garage**

<b>Permittee:</b> City of Seven Hills	
<b>Address of facility:</b> 2241 Maple View Dr.	<b>Size of facility:</b> <1 acre
<b>Date of visit:</b> 6/30/09	<b>Time of visit:</b> 12:30
<b>Provide the name(s) and title(s) of permittee staff present during inspection</b>	
Name	Title
<b>Mark K. Papke</b>	<b>City Engineer</b>
<b>Bill Bishilany</b>	<b>Service Director</b>
<b>Evaluator Observations:</b>	
<b>SWPPP or stormwater plan</b>	
Has the maintenance facility developed a SWPPP or stormwater plan?	Yes, the engineering department has developed a plan for this facility but the plan shows an incorrect drainage of the area. This should be revised.
Does the plan include a site map, list of pollutant sources, BMPs, and maintenance procedures?	The Narrative of the SWP3 does not include an inventory of possible exposed pollutants and should be amended. BMP's and maintenance procedures are indicated and sufficient.
Does the permittee conduct and document periodic inspections of the facility?	Yes – There are quarterly inspections of the facility.
Are storm drains labeled and free of debris?	Storm drains are labeled and have TRITON drop-in filters. Several of the high debris areas had storm drain inlets that were full of debris.
<b>Vehicle maintenance, fueling and washing</b>	
Are vehicle maintenance activities conducted in a designated place not exposed to stormwater?	N/A
Are fueling stations properly designed with spill kits nearby?	N/A
Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer?	N/A
<b>Material storage</b>	
Are all materials that are potential stormwater contaminants stored under cover or in secondary containment?	Erodible stockpiled material was not covered and there were no measures to direct the material towards the protected inlet. Material was running off site down a hill in the rear of the facility.
<b>Hazardous waste management</b>	
Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff?	N/A
<b>Waste management</b>	
Are waste bins covered with waste properly disposed in containers?	There were no garbage dumpsters on site.
How is landscape waste stored?	Landscape waste was stored in a dumpster and in a pile next to the dumpster.
<b>Spill response</b>	
Does the facility have a spill response plan, and are spill kits readily available?	There was oil dry in the garage but there is no official spill response plan.
<b>Employee training</b>	
What type of stormwater training do maintenance staff	In December of 2007 the maintenance staff was trained by

receive?

the Stormwater Taskforce using the Toolbox talks.

**Notes or additional information:**

**Inspections**

This facility should be inspected frequently if it is not used often. The inspections should look for leaky equipment and other potential pollutants. The drains in the building do go to the sanitary sewer but should be kept clean of any oils or hazardous liquids. The catch basin inserts should also be inspected to check for accumulation of debris which takes place rapidly due to the amount of disturbed soil.

**Stockpiled Materials**

The materials here were not stockpiled in a way to prevent runoff from leaving the site. The site should be regarded to direct stormwater to the two protected stormwater drains that have TRITON inserts in them. These two catch basins were already accumulating a large amount of suspended solids and one was already full. Please do a more frequent inspection of these two basins and set up a regular cleaning to ensure the insert is filtering out stormwater pollution.

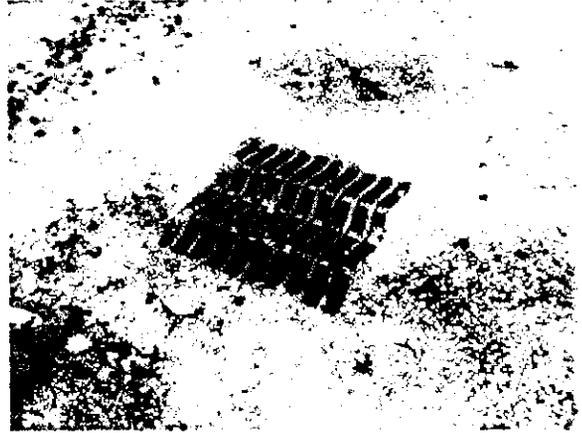
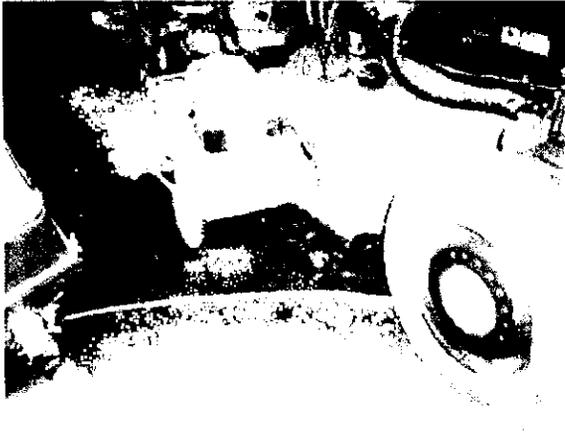
## City of Seven Hills Municipal Operation Photos

### Calvin Park Garage

Location: 2241 Maple View Dr.

Date Photos Taken: 6/30/2009

Taken By: Lindsie MacPherson



**Fig 1 (Left)** The hydraulic wood splitter was leaking fluids into the drain in the building. Inspections should be done to prevent this heave of a spill from entering the drains.

**Fig 2 (Right)** This catch basin was full of debris and more suspended solids were entering the drain. The amount of disturbed soil here will create runoff with a large amount of suspended solids. The TRITON insert will be one BMP but others should be implemented to prevent the runoff from collecting solids in suspension.



**Fig 3 (Left)** The drainage from these two piles leaves the site away from the catch basin and down the hill. This is not indicated in the SWP3 of this facility.

**Fig 4 (Right)** The yard waste in this picture should be in the dumpster and covered to prevent any leachate from being discharged.