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CUYAHOGA

ROCKY RIVER

CITY OF ROCKY RIVER

3GQ00092 2009/07/09

MACPHERSON,
LINDSIE

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Municipal Storm Water Program Evaluation

MS4 Maintenance Component Worksheet

Date of Evaluation June 24, 2009
Evaluator Name, Title Lindsie MacPherson, Ohio EPA Assistant to the District Engineer
MS4 Permittee City of Rocky River

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 Linden Safety-Service Director	City of Rocky River	(440) 331-0600 safetyservice@rrcity.com
Jeffrey A. Harrington WWTP Superintendent	City of Rocky River	(440) 356-5640 jharrington@rrcity.com
David J. Winterich Service Commissioner	City of Rocky River	(440) 356-5630
Mary Kay Costello Safety Services Coordinator	City of Rocky River	440-331-0600

MS4 Mapping		
Interview Questions	Response	
Outfalls and receiving waters mapped?	YES	
Catch basins?	YES	
Pipes, ditches, other conduits?	NO	
Public stormwater facilities (BMPs)?	NO	
Private stormwater facilities (BMPs)?	NO	
How maps are used (i.e. tracking illicit discharges)?	The City uses the map as a reference when investigating illicit discharges in the MS4 system.	
Applicable Documents		Reviewed
Map(s) of MS4 system		YES
		Obtained
		YES

Notes

MS4 Mapping

Mapping obligations under the NPDES Permit #OHQ000001 have been met. All 51 outfalls have been mapped, along with all receiving waters, by the Cuyahoga Co. Board of Health. The City's GIS specialist, Ron Gottschalk, is working on mapping catch basins, pipes, ditches and public/ private stormwater facilities in order to be in compliance with the requirements for the NPDES Permit #OHQ000002. Please note that the map should include all public and private WQ BMPs constructed after April 21, 2003 for the next permit including not only extended detention ponds, but vegetative filter strips, enhanced swales, infiltration basins, sand filters, permeable pavement, green roofs and bioretention cells.

Illicit Discharge Detection

The city has a contract with the Board of Health to continue surveying and inspecting the city's outfalls. The county does dry weather screening annually, and the last problem area found was in 2006/2007 near Spencer Creek.

Please be aware that NPDES permit #OHQ000002 requires the City of Rocky River to perform dry weather screening at all outfalls by June 2014. If any illicit discharges are detected during this screening, the City must develop a plan to eliminate them. For illicit discharges from residential septic systems, please read Part III.B.3.e of the Ohio EPA General Storm Water NPDES Permit for Small MS4s #OHQ000002 for expectations to address these sources.

Catch Basin Cleaning

Interview Question	Response				
Schedule established for inspections and cleaning?	YES The city inspects and cleans catch basins monthly.				
Is cleaning and maintenance of catch basins tracked?	YES The staff logs the cleanings in a book on site and they receive a report from the WWTP on the amount of debris taken in.				
How are spoils materials disposed of?	See Notes.				
Are storm drain pipes inspected?	YES The city uses a push camera to inspect small areas, but when larger problems occur, they are in a contract with a televising company.				
Proactive or only in response to blockage event?	Pipes are inspected during all paving projects and in response to any blockage events or problems.				
Applicable Documents					
List of active municipal construction projects	<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

Catch Basin Cleaning

Catch basins are inspected on a monthly basis and cleaned as the inspection demands. Records are kept by crews of which catch basins have been cleaned to keep the process organized. The city should be sure to follow their schedule for long term maintenance and continue regular inspections, cleanings and record keeping for catch basins.

Disposal of Catch Basin Cleanings:

The crews use a vac truck to clean the basins. The spoils are taken to a designated area at the WWTP for secondary treatment. Once the spoils have been dewatered, they are swept up and taken to a landfill box on-site. The WWTP submits a report to the city on the amount of the spoils they receive each month.

Municipal Construction Projects:

The city seems to have failed to obtain NPDES construction general permits (CGP) for the discharge of storm water associated with construction activity. Our records do not show that the City of Rocky River has obtained CGP coverage for the following municipal construction projects:

Valley View Sewer Replacement

NPDES permit coverage is required for those construction activities where the larger common plan of development or sale involves 1 or more acres of land disturbance. To obtain NPDES permit coverage for construction activities, please submit a notice of intent (NOI) application. NOIs are to be submitted at least 21 days before construction activity begins. Certain road construction projects are exempted from this requirement if they disturb less than 5 acres and are "routine maintenance". Please reference the Ohio EPA's website http://www.epa.state.oh.us/dsw/storm/routine_maint.html, which refers to routine maintenance exclusion from small construction activity permitting.

Please review all current and planned municipal construction projects to determine if CGP coverage is required. The City indicated that they will be starting a sewer replacement project on Elmwood Road. In addition, some of the water line replacements throughout the city may also need a permit before going underway.

Stormwater Management Facilities Operation and Maintenance		
Interview Questions	Response	
Public facilities inspected?	YES	
Frequency:	See Notes.	
Private facilities inspected?	YES	
Frequency:	See Notes.	
Checklist used for inspections?	NO	
Have maintenance standards and procedures been established for these facilities?	NO	
How is maintenance prioritized? Is data evaluated to target maintenance resources	NO	
Applicable Documents	Reviewed	Obtained
Inspection checklist	NO	NO

Notes
<u>Public Stormwater Facilities and Long-term Maintenance</u> The city has one underground retention basin below the Civic Center. They believe it is inspected by the Cuyahoga Soil and Water Conservation District (SWCD), but the staff was not sure. Please submit

documentation on who is to perform the public facility inspections and a sample inspection report to the Ohio EPA. The Cuyahoga SWCD does inspect the city's private stormwater facilities but the city was unable to provide documentation of these inspections. The city needs to have a long-term maintenance program in place for their public and private stormwater facilities at this time. This is a violation of the small MS4 NPDES Permit #OHQ000001 Section 3.2.5.1.4 and should be in place already. The city can either inspect the facilities using their own staff or place the burden on another responsible party, such as the Homeowners Association, and require them to submit *stormwater* inspection reports. A good long-term maintenance program is critical to assure that post-construction BMPs remain effective in perpetuity.

Road Maintenance	
Interview Questions	Response
Streets regularly swept? Frequency:	YES The city estimates that all streets are swept weekly. This is a good BMP to keep the streets free of possible pollutants.
Frequency based on water quality factors (e.g. proximity to streams)?	NO Sweeping is seasonal. The city starts in the Spring and continues through the Fall.
How are spoils disposed of?	There is a dirt pile in the maintenance yard where all sweepings are stored. This is a solid waste violation and needs to be addressed immediately. See Notes.
Does the community collect road kill? What do they do with the carcasses?	YES The animal warden works for the police department and is responsible for picking up road kill and taking the carcasses to the transfer station.
Does the community have a leaf collection program? What do they do with the collected leaves?	YES In the Fall, the city takes the leaves directly to the transfer station. From here, the leaves are taken daily to the Kurtz Brother's Composting Facility in Avon Lake
BMPs used during road maintenance activities? Describe types of road maintenance conducted by community staff and the BMPs used	YES The city conducts small projects such as road repair, crack repair, pot holes, catch basin rebuilding, general maintenance and line painting. BMPs should be followed for all projects. The city uses sand bags around inlets and checks the weather before painting projects.

Road Maintenance			
Interview Questions		Response	
BMP guidance available to field staff?		NO The city could look at turning BMP information into a booklet or flip chart for the crews.	
Deicers used by MS4?		YES The city uses straight road salt. When temperatures are extremely low, liquid calcium chloride is used. At times, to stretch the supply, the city will mix 75% salt and 25% sand.	
Type and amount of deicer and additives tracked?		YES The city uses an end of year summary to track the amount of deicers used.	
What measures are being taken to minimize the application of deicers?		They have adopted the sensible salting practices and only salt intersections, hills, curves and spot main roads.	
Sand/salt swept up after application?		NO	
How soon?		The open storage pile in the maintenance yard is a major problem for the city. See Notes.	
Applicable Documents		Reviewed	Obtained
BMP guidance		Does not exist	NO
Street sweeping records		YES	YES
Deicer application records		YES	YES

Notes
<p>Street Sweeping</p> <p>Two mechanical sweepers are used to sweep Rocky River streets on a weekly basis. The city starts sweeping in March and continues through the Fall. Sweeping is recorded by date, loads, cubic yards, and miles swept. The spoils are placed in a dirt pile in the maintenance yard and made available to residents. Please note that this is a violation of solid waste regulations. The city is not permitted to discharge leachate from street sweeping stockpiles, nor can the City distribute street sweepings. This is equivalent to open dumping of solid waste and constitutes a violation of Ohio Revised Code 3734.03, Ohio Administrative Code 3745-27-05(C) and Part III.B.6.d.iii.3 of the NPDES permit. Street sweepings are regulated as solid waste and must be disposed of accordingly. Any leachate from street sweepings must be treated as wastewater and disposed of accordingly.</p> <p>Road Deicing</p> <p>The city uses straight road salt for most of their deicing practices. For extremely low temperatures they use liquid calcium chloride, and to stretch the product out near the end of a supply the city will mix 75% salt with 25% sand. The city has adopted the sensible salting practices and has noticed an extreme difference in the amount of product used: 7 trucks were sent out per event but now only 3 spreaders are used to do the job. Please note that the use of sand may result in the discharge of suspended solids to the MS4. If sand is to be used for deicing, what measures is the City implementing to control the discharge of sand to the MS4?</p>

Notes
<p>The storage of salt in the maintenance yard is an issue. The salt is stored in an open pile on the edge of the maintenance facility. The salt runoff goes directly to the storm drain less than 50 feet from the pile, where no inlet protection is provided. This is a violation of the Small MS4 NPDES Permit #OHQ000002 Part III.B.6.d.iii.2, which states that there should be controls for reducing or eliminating the discharge of pollutants from all city owed areas including the maintenance and storage yard.</p> <p>To build on-site requires the city to obtain a <i>Rule 13 authorization</i> (Ohio Administrative Code 3745-27-13). For more information on the steps that should be taken to build on lands where a waste facility was operated please contact <i>Clarissa Gereby, Ohio EPA</i> Division of Solid and Infectious Waste Management at (330) 963-1224. If building on-site proves to be a major obstacle, the city should be looking into off-site storage where salt can be covered. Either way something needs to be done to protect salt from the weather and protect the storm drains from the salt. Interim measures such as tarping the salt pile must be implemented until a permanent solution is in place.</p>

Flood Management			
Interview Questions		Response	
Inventory of flood management structures completed?		NO The city does not own any flood management structures.	
Structures been assessed for stormwater retrofit?		N/A	
New structures include water quality considerations?		N/A	
Applicable Documents		Reviewed	Obtained
Inventory		N/A	N/A

Notes
<p><u>Stormwater Retrofit</u></p> <p>Current projects, such as the Valley View project, should be assessed for stormwater retrofitting opportunities such as tree boxes that act as sand filters, permeable pavement, bioretention cells and enhanced swales. Communities such as Rocky River are, by and large, built-out. Retrofit projects will be the primary means of implementing post-construction BMPs in your community.</p>

Facilities Operation & Maintenance			
Interview Questions		Response	
Inventory of MS4 facilities complete (i.e. facilities owned and operated by the MS4)?		YES Map of city owned facilities provided.	
<p><u>Types of facilities included</u></p> <p><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: _____ 		<u>Response</u>	<u>SWP3 Developed?</u>
		NO	N/A since do not operate

Facilities Operation & Maintenance		
Interview Questions	Response	
<ul style="list-style-type: none"> • Solid Waste Transfer Stations 22401 Lake Rd., Rocky River, OH Part of the Maintenance Facility 	YES	NO. To be included in maintenance facility SWP3.
<ul style="list-style-type: none"> • Composting Operations ✓ No discharge of leachate permitted 	NO	N/A since do not operate
<ul style="list-style-type: none"> • Airports 	NO	N/A since do not operate
<ul style="list-style-type: none"> • Shipping Ports 	NO	N/A since do not operate
<ul style="list-style-type: none"> • Steam Electric Power Plants 	NO	N/A since do not operate
<ul style="list-style-type: none"> • Wastewater Treatment Plants ≥1 MGD 	YES	YES
<i>These do not need their own permit:</i>	<u>Response</u>	<u>SWP3 Developed?</u>
<ul style="list-style-type: none"> • Impound Lots Part of maintenance yard 	YES	NO. To be included in maintenance facility SWP3
<ul style="list-style-type: none"> • Leaf Collection Yards ✓ No discharge of leafate permitted 	NO	N/A since do not operate
<ul style="list-style-type: none"> • Maintenance Yards <ul style="list-style-type: none"> ➢ How many do they operate? <u> 1 </u> ➢ List facility names/locations: 22401 Lake Rd., Rocky River, OH 	YES	NO. To be included in maintenance facility SWP3
<ul style="list-style-type: none"> • Parks <ul style="list-style-type: none"> ➢ How many in UA? <u> 9 </u> ➢ List facility names/locations: Too numerous to list. List Provided to Ohio EPA. See file. 	YES	N/A
<ul style="list-style-type: none"> • Parking Lots <ul style="list-style-type: none"> ➢ How many do they operate? <u> 9 </u> ➢ List facility name/locations: List Provided to EPA. See file. (City hall lot, downtown lot, park lots) 	YES	N/A
<ul style="list-style-type: none"> • Bus Terminals 	NO	N/A since do not operate
<ul style="list-style-type: none"> • Vehicle Maintenance Garages <ul style="list-style-type: none"> ➢ How many do they operate? <u> 1 </u> ➢ List facility name/locations: 22401 Lake Rd., Rocky River, OH 	YES	NO. To be included in maintenance facility SWP3

Facilities Operation & Maintenance	
Interview Questions	Response
Facilities inspected?	<p style="text-align: center;">NO</p> <p>The field staffs are instructed that Friday is clean-up day, but there is no official stormwater facility inspection.</p> <p>The City will need to develop a protocol with inspection frequency and an inspection checklist as part of the SWP3. See Notes.</p>
Checklist used?	<p style="text-align: center;">NO</p> <p style="text-align: center;">See Notes above.</p>
Staff which perform the inspections (department or agency):	This will need to be determined for the development of the SWP3 for the Service Garage. Mr. Winterich stated that the foreman of each department would most likely take on this responsibility.
Is there a designated stormwater contact person for each facility?	<p style="text-align: center;">YES</p> <p style="text-align: center;">David Winterich</p>
Describe enforcement procedures used to address noncompliance on a MS4-owner facility, i.e., what disciplinary measures are taken against those that do not implement standard operating procedures:	<p>A handbook that outlines the disciplinary process is supplied to all workers upon hiring. All problems are handled by Jim Linden.</p> <p>This system has not been carried out for any issue concerning stormwater or other environmental compliance issue.</p>
Parking lots owned/operated by the permittee swept? Frequency?	<p style="text-align: center;">YES</p> <p>Sweeping parking lots is not part of the staffs' regular rounds, but if the workmen are in the area the lot will be swept.</p> <p>The city may want to consider just making this a part of their regular rounds.</p>
Do you have any combined sewer systems? If yes, do you have any combined sewer overflows? <ul style="list-style-type: none"> ➤ How many? _____ ➤ Do you track frequency and volume? 	<p style="text-align: center;">NO</p> <p style="text-align: center;">NO</p>

Facilities Operation & Maintenance		
Interview Questions	Response	
Are you aware of any illicit cross connections between your sanitary sewer and MS4?	YES	
If so, what is your plan to eliminate this illicit discharge?	One was found with a sewer project back in 2005/2006. The problem was corrected immediately Illicit discharge problems are corrected immediately.	
Have you investigated the extent of infiltration and inflow into storm sewer system?	YES	
What methods have been used to conduct this investigation?	See Notes.	
What are your plans to repair and eliminate this source of illicit discharge?		
Sewer spill and cleanup procedures in place?	YES	
	The city owns a jet machine, ready to respond immediately to spills. They are also contracted with licensed collection system operators to test overflow.	
Applicable Documents	Reviewed	Obtained
Facility inventory	YES	YES
Facility SWPPP	NO	NO

Notes
<p>Facility Inventory</p> <p>Although an NPDES permit for storm water associated with industrial activity is not required for maintenance yards, the Ohio EPA General Storm Water NPDES Permit for Small MS4s #OHQ000002 requires you to develop an SWP3 for the following facilities:</p> <p>Rocky River Service Garage 22401 Lake Road Rocky River, OH</p> <p>The SWP3 must be developed and implemented within 2 years, i.e., by June 2011.</p> <p>The above facility 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. The SWP3 should contain a checklist to provide consistency to facility inspections. The SWP3 should also identify who is responsible for facility inspections as well as a stormwater contact person for each facility.</p> <p>The city also needs to keep track of all possible pollutants around the city hall and fire/ police department area. These areas, such as the fueling station, should be inspected and regulated to reduce possible stormwater pollutants.</p>

Notes	
Investigation and Infiltration into Storm Sewer System	
<p>The city is in the process of conducting an investigation for a problem near Spencer Creek where there is a high fecal count. The exact source has not been found due to the irregular pattern of data. The city has also found 2 overflows, and they are in the process of eliminating these overflows now. One will be addressed with the Lake Road repaving project, and the other will be addressed with the Valley View sewer replacement project. In both cases the sewers will be televised in order for the city to find the problem.</p>	
Sewer Spills Plan	
<p>The Fire Department reports all city clean-ups such as those of car accidents on city streets, where fluids were spilled. It is advised that the city develop a protocol or establish procedures that must be followed by the sanitary sewer system operator to respond to spill events and minimize or prevent the discharge of untreated sewage to the City's MS4.</p>	

Pesticides, Herbicides & Fertilizers			
Interview Questions	Response		
Certified applicators used?	The city contracts all fertilization out to Davey Tree Commercial Grounds Management.		
Integrated Pest Management (IPM) practices used?	NO		
Storage location of pesticides, herbicides, and fertilizers:	N/A		
BMPs used during application:	Unknown		
Fertilizer/pesticide application plan utilized?	NO		
Applicable Documents		Reviewed	Obtained
Fertilizer/pesticide application plan		NO	NO

Notes	
<p>The city has a contract with Davey Tree Commercial Grounds Management to fertilize all park areas and city grounds. As with other BMPs where third parties are relied upon to enact a BMP, it is the city's obligation to assure contract language/agreements specify that storm water BMPs must be implemented by the third party. Possible BMPs include: sweeping up fertilizer applied to paved surfaces, cleaning up spills, not applying just prior to an expected storm event and the use of integrated pest management practices.</p>	
<p>The city also needs to have a contract with the "bug man" who sprays around the City's buildings for pests. This contract must have the same language for stormwater BMPs for the pesticide application process.</p>	

Standards, BMPs, & Outreach	
Interview Questions	Response
BMP technical guidance document available to maintenance staff?	NO
MS4 use contractual staff to complete MS4 maintenance activities?	YES

Standards, BMPs, & Outreach			
Interview Questions		Response	
BMP guidance materials provided to contracted staff?		YES	
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, i.e. public spaces):		Pet waste: All parks are equipped with pet waste receptacles, and the city is looking to get more. Litter reduction: No current public education or outreach on litter reduction.	
Applicable Documents		Reviewed	Obtained
BMP manual or guidance document		NO	NO
Contract language for MS4 operation and maintenance activities		NO	NO

Notes
<p>BMPs Guidance The city staff inspects construction sites to ensure proper BMPs are being followed. They look for cars to be parked in gravel or grassy areas and all unused materials and equipment that may leak to be tarped. The city has also started to regulate weed control by weed whacking curbs to control pollution.</p> <p>Contracted Services It is the city's obligation to assure contract language/agreements specify that storm water BMPs must be implemented by the third party. Please be sure to add this language to any future requests for proposal or contracts you sign with third party service providers whose activities can create storm water pollution. Periodic inspection of their operations in your community is also suggested.</p> <p>Public Education/ Outreach There is a set up in the lobby of city hall filled with information on stormwater pollution and also some materials provided by the Cuyahoga SWCD. The city also has a booth at the city's fair where information on stormwater is made available. The rain barrel workshops provided by the SWCD are also made available to residents.</p>

Staff Education and Training	
Interview Questions	Response
Staff trained to identify potential storm water pollution sources which would result in illicit discharges? Frequency:	YES The building department is involved in ongoing seminars put forth by the Ohio EPA and Cleveland State University. The city is working on a more consistent annual training program for all maintenance staff.
Materials used to train staff:	In 2008, the maintenance staff watched a DVD called "Everyday BMPs," and the attendance was documented.

Staff Education and Training			
Interview Questions		Response	
Applicable Documents		Reviewed	Obtained
Training materials		YES	YES

Notes
<p><u>Staff Training and Education</u></p> <p>The city is looking for a new method to train staff for the 2009 period. There was mention of a combined library for stormwater pollution training with the surrounding cities that may be worth a second look.</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 are 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. The Center for Watershed Protection also has information available for training in their Manual #9: Municipal Pollution Prevention/Good Housekeeping Practices.</p>