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CUYAHOGA PARMA HTS

CITY OF PARMA HEIGHTS

3GQ00125 2009/09/21

BOGOEVSKI,  
DANIEL

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State of Ohio Environmental Protection Agency

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

September 21 2009

RE: CUYAHOGA COUNTY  
CUYAHOGA RIVER WATERSHED  
CITY OF PARMA HEIGHTS  
MUNICIPAL STORM WATER PROGRAM  
AUDIT FINDINGS – MCM #6

Mr. Richard S. Wasosky, City Engineer  
City of Parma Heights  
6281 Pearl Road  
Parma Heights, OH 44130

Dear Mr. Wasosky:

Ohio EPA has completed an audit for a portion of your municipal storm water program. Our audit primarily focused on implementation of minimum control measure (MCM) #6: Pollution Prevention and Good Housekeeping for Municipal Operations. This program is a requirement of the Ohio EPA General Storm Water National Pollutant Discharge Elimination System (NPDES) Permit for Small Municipal Separate Storm Sewers Systems (MS4s) #3GQ00125\*BG and Ohio Administrative Code 3745-39.

On August 11, 2009, the Ohio EPA met with you and other representatives of the City of Parma Heights to determine compliance with the NPDES permit and the Storm Water Management Plan (SWMP) submitted by the City in March 2003. In performing this audit, Ohio EPA implemented the Municipal Storm Water Program Evaluation Guide developed by the United States Environmental Protection Agency.

Attached are the Municipal Storm Water Program Evaluation and Field Inspection Worksheet(s) completed for your community. Please review these documents in detail to determine specific elements where your pollution prevention and good housekeeping program needs improvement. In addition, you will find comments suggesting ways to improve your MS4 program. The following is a summary of our audit findings:

**Violations:**

- **Failure to provide controls for reducing or eliminating the discharge of pollutants from the leaf collection area located at Nathan Hale Park off Oakdale.** This is a violation of Part III.B.6.d.iii.2 of the Small MS4 NPDES Permit #OHQ000002 and ORC 6111.04 and 6111.07. Our audit revealed that stockpiles of leaves, wood chips, construction spoils and street sweepings are being stored without containment. This allows the discharge of leachate from these stockpiles to the MS4. The NPDES permit does not authorize the discharge of leachate. Control measures must be implemented immediately to prevent future violations of the permit. Also, note that the pile of street sweepings must be removed immediately from the site and disposed properly.

**Deficiencies:**

- The City needs to assure contract language/agreements with third party service providers specify that storm water best management practices (BMPs) must be implemented when said third party conducts a municipal operation and is relied upon to implement a BMP. Please add language to any future requests for proposal or contracts you sign with third party service providers whose activities can create storm water pollution. We noted that the City relies upon the City of Parma to dispose of catch basin cleanings and street sweepings, yet no contract or Memorandum of Understanding exists between the two parties.

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- The City has not developed a Storm Water Pollution Prevention Plan (SWP3) for the Service Garage and does not conduct regular inspections at the facility to assure the implementation of storm water BMPs. The City is required to develop and implement an SWP3 for this facility **no later than June 4, 2011**. Further, this facility must be inspected (with a checklist) at least once per year during the next permit cycle to assure that storm water BMPs are implemented as specified in the SWP3. Please reference Ohio EPA General Storm Water NPDES Permit for Industrial Activities #OHR000004 Part IV. D.2.a.1 for more information on the development of a site map for the SWP3. Also see Notes within the attached Program Evaluation worksheet for more information on the SWP3 and its contents.
- 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. *Reference the Evaluation attachment for more information on this subject.*
- The City has not developed an efficient way to track the amount of salt used or a tracking procedure for catch basin cleaning. More detailed tracking may allow the city to better identify inefficiencies in salt application and catch basin cleaning. The City will need to quantify the amount and identify the materials used for deicing activities under NPDES Permit #OHQ000002 beginning with the 2009-2010 winter season.
- To date, municipal staff has had one training event on storm water pollution prevention practices. Please be aware that NPDES Permit #OHQ000002 requires employee training on an annual basis through the end of the permit term (2014). Please plan to provide training and document attendance accordingly.

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 October 16, 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) 963-1145 or via e-mail at [dan.bogoevski@epa.state.oh.us](mailto:dan.bogoevski@epa.state.oh.us).

Sincerely,



Dan Bogoevski  
District Engineer  
Division of Surface Water

DB/mt

cc: Joseph Tal, Service Director  
Laura Travers, Cuyahoga County Board of Health  
Martin Zanotti, Mayor, City of Parma Heights