3GQ0008020090702

LORAIN	OBERLIN	CITY OF OBERLIN	3GQ00080	2009/07/02	MACPHERSON, LINDSIE

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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 1, 2009

RE: LORAIN
BLACK-ROCKY RIVER WATERSHED
CITY OF OBERLIN
MUNICIPAL STORM WATER PROGRAM
AUDIT FINDINGS

Mr. Jeff Baumann
Public Works Director
City of Oberlin
85 S. Main Street
Oberlin, OH 44074

Dear Mr. Baumann:

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) OHQ00080*BG and Ohio Administrative Code 3745-39.

On June 11, 2009, Ohio EPA met with you and other representatives of the City of Oberlin 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 submit annual reports for 2007 and 2008.** This is a violation of Part IV.C of the Ohio EPA General Storm Water NPDES Permit for Small MS4s #OHQ000002 and Ohio Administrative Code (OAC) 3745-39-03(C)(7)(c). Annual reports were to be submitted to Ohio EPA no later than April 3, 2008, and April 3, 2009, summarizing your activities in 2007 and 2008, respectively. Ohio EPA has never received these reports. Please be aware that annual reports must be submitted every year, however, starting with the report for 2009, reports will be due on April 1st of each year. Thus, the report for 2009 must be submitted by April 1, 2010.

- **Failure to obtain industrial storm water permit coverage for the composting facility and the power plant**. This is a violation of Ohio Revised Code (ORC) 6111.04 and OAC 3745-39-04. Composting activities are categorized under Standard Industrial Classification (SIC) Code 2785 and steam electric power generating facilities are defined as "industrial activity" under 40 CFR 122.26(b)(14)(i)-(xi). An NPDES permit is required to discharge storm water runoff from these facilities. Ohio EPA does not have any record of storm water permit coverage for the compost yard at 44461 SR 511 E. or the power plant at 289 S. Professor St. You must obtain coverage under the Ohio EPA General Storm Water NPDES Permit for Industrial Activities #OHR000004 by submitting Notices of Intent (NOIs) and implementing Storm Water Pollution Prevention Plans (SWP3s) within 180 days of receiving permit coverage. Each facility needs its own NPDES permit and SWP3. Required elements of the SWP3 are described in the NPDES permit, which can be downloaded at www.epa.state.oh.us/dsw/storm/stormform.html. Fact sheets which provide guidance on best management practices (BMPs) for various industrial "sectors" can be found on US EPA's Web site at:

  http://cfpub.epa.gov/npdes/stormwater/indust.cfm.

- **Failure to develop a construction site runoff control program with procedures for site inspection and enforcement of control measures**. This is a violation of ORC 6111.04 and 6111.07 and Part III.B.4.b.vi of the OHQ000002. Mr. Baumann indicated during our interview that the City of Oberlin does not perform construction site inspection to determine compliance with storm water BMP requirements. You were required to have a program to conduct construction site inspections no later than April 3, 2008.

- **Failure to provide training to municipal staff on storm water pollution prevention matters.** This is a violation of Part III.B.6.b and III.B.6.e of the Ohio EPA General Storm Water NPDES Permit for Small MS4s #OHQ000002. Please be aware that the City is required to provide at least one training session each year on storm water BMPs to municipal staff whose job can affect compliance with the MS4 permit. No training events have been conducted to date.

- **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 Ohio EPA General Storm Water NPDES Permit for Small MS4s #OHQ000002. 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 the Central Garage, the Power Plant, the Cemetery Maintenance Facility, and the Composting Facility in an updated compiled list.

- **Failure to ensure adequate long-term operation and maintenance of public/ private storm water management facilities as well as City catch basins.** This is a violation of Part III.B.5.d of the Ohio EPA General Storm Water NPDES Permit for Small MS4s #OHQ000002. A program to ensure long term maintenance of post-construction BMPs typically includes (a) maintaining an inventory of all public and private post-construction 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.

- **Failure to develop, implement and enforce a program to detect and eliminate illicit discharges.** This is a violation of Part III.B.3.a and III.B.3.i.iv of the Ohio EPA General Storm Water NPDES Permit for Small MS4s #OHQ000002. To date, the City of Oberlin has not conducted any dry weather screening of outfalls or performed other activities to identify illicit discharges to the MS4. Please be aware that the City of Oberlin is required to perform dry weather screening on 100% of its outfalls no later than June 2014. A guidance manual for illicit discharge detection is readily available from the Cuyahoga County Board of Health Web site at www.ccbh.net.

Deficiencies:

- 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 does not conduct regular inspections of storm water BMPs at its facilities. Please be aware that an inspection must be conducted at least once per year, per facility, during the next permit cycle once Storm Water Pollution Prevention Plans (SWP3) are developed. The SWP3s must be developed within 2 years.

- The city needs to assure contract language/agreements specify that storm water BMPs must be implemented by a third party, when said third party is relied upon to enact a BMP. 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.

- The City has not developed an efficient way to track the amount of salt used. More detailed tracking may allow the city to better identify inefficiencies in salt application. The city will need to quantify the amount and the materials used for deicing activities under NPDES Permit #OHQ000002 beginning with the 2009-2010 winter season.

- The Water Pollution Control Plant needs to terminate their NPDES Permit by submitting a Notice of Termination, which can be found on the Ohio EPA Web site at www.epa.state.oh.us/dsw/storm/stormform.html.

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 August 1, 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) 963-1128 or via e-mail at Lindsie.macpherson@epa.state.oh.us.

Sincerely,

Lindsie MacPherson
Assistant to the District Engineer
Division of Surface Water

LM/mt

cc: Eric Norenberg, City Manager, City of Oberlin
Jason Fyffe, Ohio EPA, DSW, CO

Municipal Storm Water Program Evaluation

MS4 Maintenance Component Worksheet

Date of Evaluation
June 11, 2009
Evaluator Name, Title
Lindsie MacPherson, Ohio EPA Assistant to the District Engineer
MS4 Permittee
City of Oberlin

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**
Jeff Baumann Public Works Director	City of Oberlin	(440) 775-7204 jbaumann@cityofoberlin.com

MS4 Mapping	
Interview Questions	**Response**
Outfalls and receiving waters mapped?	YES
Catch basins?	YES
Pipes, ditches, other conduits?	YES
Public stormwater facilities (BMPs)?	YES
Private stormwater facilities (BMPs)?	YES
How are maps used (i.e. tracking illicit discharges)?	Map was generated for compliance and has not yet been used to complete a field survey of illicit discharges.

Applicable Documents	Reviewed	Obtained
Map(s) of MS4 system	YES	YES

Notes

MS4 Mapping

Mapping obligations under the NPDES Permit #OHQ00001 have been met. The map was generated to meet compliance obligations and has not been used for illicit discharge investigations or tracking. All outfalls have been mapped as well as some of the requirements for the NPDES Permit #OHQ000002. The city mapped public and private basins and ponds but needs to continue in mapping other stormwater facilities including: open ditches that are part of the MS4, and both public and private BMPs that have been built since April 21, 2003 and were designed to act as the post-construction BMP for new development and redevelopment where the larger common plan of development or sale disturbs 1 or more acre of land. Post-construction BMPs include not only extended detention ponds, but vegetative filter strips, enhanced swales, infiltration basins, sand filters, permeable pavement, green roofs and bioretention cells.

Notes

In addition, the City was not clear on what constitutes a stream rather than a ditch. The ditches which must be mapped to comply with NPDES permit #OHQ000002 are those that are part of your MS4. Ohio EPA recommends using the maps contained in the Lorain County Soils Survey to distinguish streams from ditches. There are a number of water bodies in Lorain County that are named "ditches", e.g., Kline Ditch, but in fact are streams. To be part of your MS4, a ditch must meet the definition of MS4. Please refer to Part VI of the NPDES permit for the definition of MS4.

At this time the city does not use the map proactively. Some primary uses for an MS4 map are to have an inventory of all post-construction BMPs and to track illicit discharges.

Illicit Discharge Detection

The city states that they have not identified any illicit discharges from the MS4 to date; however, they have not conducted an investigation for illicit discharges or performed dry weather screening.

Please be aware that NPDES permit #OHQ000002 requires the City of Oberlin 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?	NO
Is cleaning and maintenance of catch basins tracked:	NO
How are spoils materials disposed of?	See notes.
Are storm drain pipes inspected? Proactive or only in response to blockage event?	YES The city inspects pipes on a complaint basis from public works staff and residences. They own a sewer camera to conduct the inspections but there is no set schedule.

Applicable Documents	Reviewed	Obtained
List of active municipal construction projects	YES	YES

Notes

Catch Basin Cleaning

The city does clean catch basins, but there is no regular maintenance schedule. If a complaint is called in or a problem occurs the city will clean the basin. Mr. Baumann believes that the City probably cleans all basins over a 12 to 18 month time period. The City will need to establish a schedule for the long term maintenance of catch basins, including regular inspections, cleanings, and record keeping. Mr. Baumann indicated that he knows this is a good practice, but the city is short of resources and staff to further expand on this BMP at this time. The new City Engineer, Randall Roberts, is working on finalizing ordinances and may start drawing up a compliance inspection checklist for private facilities.

Disposal of Catch Basin Cleanings

The city uses a 2110 Vactor Jet to clean catch basins of leaves, stones, dirt, floatables, and other organic debris. The spoils are taken to an unloading station at the service complex with a sanitary sewer connection. After they are dewatered on this pad, they are placed in a dumpster and taken to a landfill.

Municipal Construction Projects

The city has one project at this time; the addition and renovation of the Oberlin Fire Station. The City does have coverage under the Ohio EPA General Storm Water NPDES Permit for Construction Activities #OHC000003 for this project and has just started to mobilize.

Stormwater Management Facilities Operation and Maintenance	
Interview Questions	**Response**
Public facilities inspected? Frequency:	YES The city has no proactive system for inspections, but when a problem has occurred the city has responded.
Private facilities inspected?	NO
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

Public Stormwater Facilities

The City does own stormwater management facilities, but they only inspect the facilities in response to problems. The only issue the city has had recently was with a pond on the south end of town. A few complaints were called in about the "nuisance" vegetative growth in the pond.

Long-Term Maintenance of Public and Private Storm Water Facilities

The City does not 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 #OH000001 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 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** On-going project from April to September. All roads swept at least twice a year and downtown roads swept almost every week.
Frequency based on water quality factors (e.g. proximity to streams)?	**NO**
How are spoils disposed of?	Spoils disposed of in the same unloading station as for catch basin cleanings at the service yard.
Does the community collect road kill? What do they do with the carcasses?	**YES** The city has its own refuse collection operation. City trucks pick up road kill and then take back to the maintenance facility where it is placed in a garbage truck and disposed of directly to the landfill (Allied Waste Facility).
Does the community have a leaf collection program? What do they do with the collected leaves?	**YES** City collects leaves seasonally and takes the yard waste to the city of Oberlin Composting Facility on 44436 S.R. 511 East, Oberlin, OH. It is a Class IV composting facility, license number 47-7-0083.
BMPs used during road maintenance activities? Describe types of road maintenance conducted by community staff and the BMPs used	**NO** The city takes on small patching with hot mix, cold patching, concrete repairs, sink holes up to 7 ft., pavement markings, plowing and sweeping. There is no staff awareness of good BMPs. When repairing roads, Mr. Baumann stated that staff protects storm drains and limits erosion, but he did not produce documentation that staff is trained in stormwater BMPs. The city could look at turning BMP information into a booklet or flip chart for the crews or search the internet for existing guidance materials.
BMP guidance available to field staff?	**NO** See Notes Above.
Deicers used by MS4?	**YES**

Road Maintenance	
Interview Questions	**Response**
Type and amount of deicer and additives tracked? What measures are being taken to minimize the application of deicers?	**NO** The city does public education on why less salt is being applied, but they do not have the figures in hand because activities are not tracked.
Sand/salt swept up after application? How soon?	**NO** Some loading/ unloading activities occur outside. City needs to do a better job of sweeping around reload area. No salt spills have been reported on streets or by salt storage area.

Applicable Documents	Reviewed	Obtained
BMP guidance	Does not exist	N/A
Street sweeping records	YES	YES
Deicer application records	NO	NO

Notes

Street Sweeping

Street sweeping is conducted on a seasonal basis from April to September. The city uses a 2007/2008 Ford vacuum truck to carry out the sweepings. The sweeping records consist of hand written logs with colored maps to show which streets have been swept. The records were obtained and reviewed but they do not have any quantities recorded for material picked up. The city will need to quantify the amount of debris swept up for NPDES Permit #OH000002.

Road Maintenance Activities

While carrying out these repairs Mr. Baumann indicated that the staff protects storm drains and limits erosion, but altogether there is little staff awareness of good BMPs. Along with the training the public works staff receives on the proper usage of operating the vactor and salt trucks, the city could also provide training on stormwater best management practices for their jobs.

Road Deicing

The City uses plain road salt with no additives to deice their roads. The salt is stored at the Service Yard in a three sided, roofed containment, which can hold up to 750 tons. They have provided updated snow removal procedures to citizens as public education to inform the city of the limited salt usage. This document was reviewed and obtained by the EPA.

Training for salt application staff is in development but is not yet in place. The City should focus on good housekeeping with road salt application, including practices such as sweeping around the loading/unloading area. Also, salt spreaders should be calibrated to assure efficient application.

The City has also not come up with a practical way to track the amount of salt used. They know the number of trucks that go out, so they may be able to track quantity using truck loads along with an end summary of total purchased and total left at end of season. More detailed tracking of this information may allow you to better identify inefficiencies in salt application. The city will need to quantify the amount of salt used and the materials used for NPDES Permit #OHQ000002 beginning with the 2009-2010 winter season.

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

Applicable Documents	Reviewed	Obtained
Inventory	NO	NO

Notes

Inventory

An inventory of public/privately-owned stormwater management facilities built since April 21, 2003 is part of the new mapping requirements of NPDES permit #OHQ000002. This inventory must be completed by the end of your next permit term, i.e., June 2014.

Water Quality/ Retrofitting

The city requires water quality to be considered for all new projects, and have already incorporated water quality units such as bioretention cells at the new service garage. The City should also be evaluating existing infrastructure for water quality retrofitting such as tree boxes that act as sand filters, permeable pavement where soils allow or converting the outlets on existing detention and retention basins so that they provided extended detention of the Water Quality Volume (WQv).

Facilities Operation & Maintenance		
Interview Questions	**Response**	
Inventory of MS4 facilities complete (i.e. facilities owned and operated by the MS4)?	NO	
Types of facilities included *These need their own NPDES storm water permit for industrial activities, if there is a discharge of runoff from these operations:*	**Response**	**SWP3 Developed?**
• Landfills Type:_____	**NO**	N/A since do not operate
• Solid Waste Transfer Stations ✓ 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,	**NO**	N/A since do not operate
• Composting Operations ✓ No discharge of leachate permitted **44461 S.R. 511 E., Oberlin, OH**	**YES**	**NO**
• Airports	**NO**	N/A since do not operate
• Shipping Ports	**NO**	N/A since do not operate
• Steam Electric Power Plants **289 South Professor St., Oberlin, OH** The facility does not handle coal. Electricity is generated via natural gas and diesel combustion.	**YES**	**NO**
• Wastewater Treatment Plants ≥ 1 MGD **44461 S.R. 511 E., Oberlin, OH**	**YES**	**NO**
	All storm water runoff from areas of industrial activity at this facility is directed to the head of the treatment works. As such, the existing storm water permit for this facility can be terminated. See Notes.	
These do not need their own permit:		
• Impound Lots	**NO**	N/A since do not operate
• Leaf Collection Yards ✓ No discharge of leafate permitted	**Part of the Composting Operation noted above. See Notes below.**	

Facilities Operation & Maintenance		
Interview Questions	**Response**	
	Response	**SWP3 Developed?**
• Maintenance Yards ➢ How many do they operate? __2__ ➢ List facility names/locations: **General Maintenance Facility Service Complex** **539 Hill Creek Dr., Oberlin, OH** **Cemetery Maintenance Facility** **455 Morgan St., Oberlin, OH**	**YES**	**NO**
• Parks ➢ How many in UA? __12__ ➢ List facility names/locations: **Too numerous to list. List Provided to Ohio EPA. See file.**	**YES**	N/A
• Parking Lots ➢ How many do they operate? __1__ ➢ List facility name/locations: **City Hall parking lot at** **85 S Main St., Oberlin, OH**	**YES**	N/A
• Bus Terminals	**NO**	N/A since do not operate
• Vehicle Maintenance Garages ➢ How many do they operate? ➢ List facility name/locations: **Performed at Maintenance Yards**	**YES** Separate SWP3 not required. SWP3 for Maintenance Yards will provide BMPs for Maintenance Garage activities at these facilities	
Facilities inspected?	**NO** The City will need to develop a protocol with inspection frequency and an inspection checklist as part of the SWP3 for facilities that require an SWP3. See Notes. Do not inspect parking lots.	
Checklist used?	**NO** See note above.	

Facilities Operation & Maintenance	
Interview Questions	**Response**
Staff which perform the inspections (department or agency:	Not determined
Is there a designated stormwater contact person for each facility?	**NO** Will need to be established in SWP3.
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?:	Union staff is tied to a labor agreement. Disciplinary actions are outlined in the labor manual. If noncompliance arises, staff is invited to a disciplinary hearing and a report is issued. This system has not been carried out for any issue concerning stormwater or other environmental compliance issue.
Parking lots owned/operated by the permitee swept? Frequency?	**YES** Mr. Baumann does not know.
Do you have any combined sewer systems? If yes, do you have any combined sewer overflows? ➢ How many? _____ ➢ Do you track frequency and volume? 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 **NO** The city has not investigated to determine the existence of illicit discharges. and has not done any dry weather screening. A program to identify illicit discharges and eliminate them must be developed and implemented in order to comply with your NPDES permit.
Have you investigated the extent of infiltration and inflow into storm sewer system? What methods have been used to conduct this investigation? What are your plans to repair and eliminate this source of illicit discharge?	**NO** No investigation has taken place. The city needs to begin efforts to start investigating infiltration and inflow as well as cross connections.

Facilities Operation & Maintenance	
Interview Questions	**Response**
Sewer spill and cleanup procedures in place?	NO No written procedures but crew and equipment ready to react to over flow.

Applicable Documents	Reviewed	Obtained
Facility inventory	NO	NO
Facility SWPPP	NO	NO

Notes

Facility Inventory

The City has not compiled an inventory of all MS4 facilities. This inventory was required in the NPDES permit #OHQ000001 and should be in the City's SWMP. The inventory should be kept up to date in the SWMP and easily accessed.

The City is also in violation of Ohio Revised Code 6111.04 and Ohio Administrative Code 3745-39-04 for failure to obtain NPDES permit coverage for facilities that discharge storm water runoff associated with industrial activity. There is no record of an NPDES permit for stormwater discharges associated with industrial activity and no Storm Water Pollution Prevention Plan (SWP3) developed for the following facilities:

The City Of Oberlin Composting Facility
44461 S.R. 511 East
Oberlin, OH

Oberlin Municipal Power and Light
289 S. Professor Street
Oberlin, OH

The city must submit a notice of intent (NOI) for the Ohio EPA General Storm Water NPDES Permit for Industrial Activities #OHR000004. An SWP3 will also need to be developed and implemented for these facilities within 180 days of submitting the NOI.

Composting Operation

We noted an unpermitted discharge of leachate from a compost pile entering a drainage ditch along the access road, which is a tributary to Plum Creek. BMPs need to be implemented to prevent discharges of wastewater such as leachate. Most composting facilities will segregate leachate from storm water runoff and collect it for reuse using berms around compost piles. Compost piles are placed in windrows. Leachate is collected and recirculated onto compost piles to aid in the composting process. Excess leachate is directed to sanitary sewer or is stored in tanks and taken off-site for proper disposal.

Wastewater Treatment Plant

The city can terminate their NPDES permit for the Water Pollution Control Plant at 44461 S.R. 511 East. All runoff associated with industrial activity on this site is directed to the head of the plant. The facility needs to file a Notice of Termination, which can be found on the Ohio EPA website at www.epa.state.oh.us/dsw/storm/stormform.html.

Facilities Operation & Maintenance	
Interview Questions	**Response**

Maintenance Yards

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:

General Maintenance Division Service Complex
539 Hill Creek Drive
Oberlin, OH

Cemetery Maintenance Facility
455 Morgan Street
Oberlin, OH

The SWP3 must be developed and implemented within 2 years, i.e., by June 2011.

The above facilities, including the compost facility and power plant, 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.

Sewer Spill Plan

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.

Pesticides, Herbicides & Fertilizers	
Interview Questions	**Response**
Certified applicators used?	**YES**
Integrated Pest Management (IPM) practices used?	**NO**
Storage location of pesticides, herbicides, and fertilizers:	Cemetery Maintenance Facility, 455 Morgan St., Oberlin. OH. The city stores the chemicals in locked storage cabinets.
BMPs used during application:	The city considers weather conditions before application such as wind and rain. All application staff is ODA-licensed and training is part of the licensing procedures.
Fertilizer/pesticide application plan utilized?	**YES** Plan was obtained by the EPA and reviewed. The plan is for the Recreation Complex and states what is used and how much.

Applicable Documents	Reviewed	Obtained
Fertilizer/pesticide application plan	YES	YES

Pesticides, Herbicides & Fertilizers Notes
The City's staff and contracted services are responsible for applying pesticides, herbicides and fertilizers. The City minimizes the use of these chemicals. Fertilizer is applied at the city recreation complex on soccer and baseball fields only. There is also spot spraying of weeds in the downtown area. In addition, the City has opted out of the Lorain County Health Department's mosquito spraying program. Instead, the City has gone with another form of mosquito control using B.T.I. Briquetes. This is a more effective and environmentally-friendly method as opposed to pesticides. The briquetes are distributed to residents and city maintenance crews, and the distribution is logged. So far this year, between April 22, 2009 and June 10, 2009, about 265 have been handed out.

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**
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):	**Pet waste:** No doggie bags. The city may work on this with future interns. **Litter reduction:** The city uses general public outreach about solid waste.

Applicable Documents	Reviewed	Obtained
BMP manual or guidance document	NO	NO
Contract language for MS4 operation and maintenance activities	NO	NO

Notes
Contract Language 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. 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. **Public Education/ Outreach** The city has pamphlets and flyers on mosquito control, leaf collection, road salt and household waste collection. Some of this goes in the local newspaper or is directly mailed to residents. The City's website is under construction, but the information is made available at City Hall and the Public Library. There is also a riparian brochure sent directly to the affected property owners.

Staff Education and Training	
Interview Questions	**Response**
Staff trained to identify potential storm water pollution sources which would result in an illicit discharge? Frequency:	NO City staff is not specifically trained to identify illicit discharge in storm water. N/A
Materials used to train staff:	N/A

Applicable Documents	Reviewed	Obtained
Training materials	NO	NO

Notes

Staff Training and Education

Failure to provide training to municipal staff on storm water pollution prevention matters is a violation of Part 3.2.6.1.1 of the Ohio EPA General Storm Water NPDES Permit for Small MS4s #OHQ000001. The permit requires the City to develop and implement an operations and maintenance program for its MS4 that includes a training component. The City was unable to demonstrate that any training has been provided on storm water pollution prevention matters. Please begin documenting the training events provided and staff being trained. NPDES permit #OHQ000002 requires you to train staff on storm water pollution prevention at least once every year.

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.

General Maintenance Division Service Complex Evaluation

MS4 Maintenance Facility Field Inspection Worksheet

Permittee: City of Oberlin	
Address of facility: 539 Hill Creek Dr., Oberlin , OH *General Maintenance Division Service Complex*	**Size of facility: Unknown**
Date of visit: June 11, 2009	**Time of visit: 2:30p.m.**

Provide the name(s) and title(s) of permittee staff present during inspection

Name	Title
George Rucker	***Chief Mechanic***
Dave Rucker	***Superintendent***
Jeff Baumann	***Public Works Director***

Evaluator Observations:	
SWPPP or stormwater plan	
Has the maintenance facility developed a SWPPP or stormwater plan?	**Not at this time. The city will need to develop a SWP3 for NPEDES permit #OHQ000002 within 2 years of permit renewal (June 2011).**
Does the plan include a site map, list of pollutant sources, BMPs, and maintenance procedures?	**N/A, but this is a required component of the SWP3 once developed.**
Does the permittee conduct and document periodic inspections of the facility?	**NO. See Interview.**
Are storm drains labeled and free of debris?	**NO. Drains have some debris and need to be cleaned out.**
Vehicle maintenance, fueling and washing	
Are vehicle maintenance activities conducted in a designated place not exposed to stormwater?	**Maintenance is conducted in the vehicle maintenance building where all drains are connected to an oil/ water separator and then to sanitary sewers.**
Are fueling stations properly designed with spill kits nearby?	**Need Spill Kit clearly labeled at fueling station. We recommend a larger, more noticeable sign for the emergency shut-off button.**
Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer?	**YES. Vehicles washed in designated area (wash pad in cell #14). Wash water discharged to sanitary sewer.**
Material storage	
Are all materials that are potential stormwater contaminants stored under cover or in secondary containment?	**NO. See Notes.**
Hazardous waste management	
Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff?	**Used oil drums should be contained in *spill containment trays* and labeled "Used Oil."**
Waste management	
Are waste bins covered with waste properly disposed in containers?	**YES. All dumpsters need to be lidded or tarped.**
How is landscape waste stored?	**Yard waste was not evident on this site.**
Spill response	
Does the facility have a spill response plan, and are spill kits readily available?	**NO. Some spill response materials are available but a fully-stocked, labeled spill kit would be more efficient.**
Employee training	
What type of stormwater training does maintenance staff receive?	**See Interview.**

Notes or additional information:

Material Storage

There are a number of old materials stored on site that need to salvaged and scrapped, e.g., a wrecked police car, old propane tanks, etc. The maintenance yard should not become the junk yard. The facility needs to avoid accumulating scrap and must recycle/salvage or dispose of it regularly. There is also oil runoff from old equipment, so engine should be tarped until scrap is taken away. As an alternate, materials such as the engine can be stored indoors until it is installed. If damaged vehicles or equipment must be stored outside awaiting salvage, all fluids should be drained from the vehicles or equipment before placing these items in the yard.

The area around the salt dome is not swept, and a residue can be seen leading away from the area. The city is looking into installing a concrete apron to eliminate this problem. The City did provide a tarp on the face of the salt pile that does not fully fit within the storage area.

There are stockpiles of #8 limestone and other aggregate/bedding materials used in construction. Sediment controls must be implemented to control runoff from these piles or these piles may be tarped or placed under cover. Sediment conveyed by runoff from these piles was observed in the back area.

Drums containing liquids, even when stored in a building, should be stored on a spill containment tray or within secondary containment to minimize releases due to spills. As an example, we noted drums in the Refuse Recycling Building stored directly on the floor.

Water Quality Structures

This facility was constructed in 2006-2007, yet we noted several areas that were not brought to permanent stabilization as required by the Ohio EPA General Storm Water NPDES for Construction Activities #OHC000002. Drainage swales and the embankments of the storm water management ponds have spotty weed growth rather than a dense vegetative cover. In addition, the bioretention cell is overgrown with weeds and bioretention plants were not evident. The cell needs repair to be functional once more.

Further, review the permanent outlet structure that should be in place in the two detention basins. We noted what appears to be a temporary sediment control riser still in place in both basins. Please be aware that the permanent outlet structure must provide a water quality orifice designed to drain the Water Quality Volume (WQv) in 48 hours for a dry extended detention basin. Check plans for the basins to determine if the correct structure is in place.

The swales preceding the detention basin need to be stabilized.

City of Oberlin MS4 Program Audit

Municipal Operation Photos

General Maintenance Division Service Complex

Location: 539 Hill Creek Dr.
Date Photos Taken: June 11, 2009
Taken by: Lindsie MacPherson

Fig 1(LEFT): As a good housekeeping practice, sweep all excess materials back into the storage unit to avoid contaminated runoff.

Fig 2 (RIGHT): Drain all *unused* vehicles of fluids when stored outside or find a place inside to store this machine. If this piece of equipment must be stored outside find a grassy or stoned area away from storm drains.

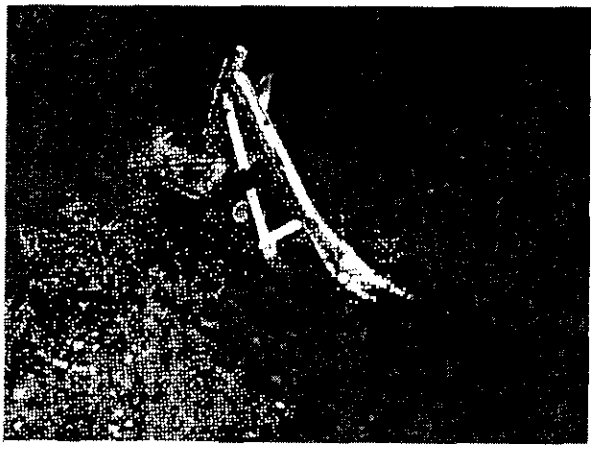


Fig 3 (LEFT): Scrap in the back of the maintenance yard needs to be disposed of on a more regular basis. It is not a good BMP to store scrap metal and equipment outside for long periods of time.

Fig 4 (RIGHT): Scrap that was pushed over the curb during the winter months needs to be placed back with the other scrap and disposed of properly.

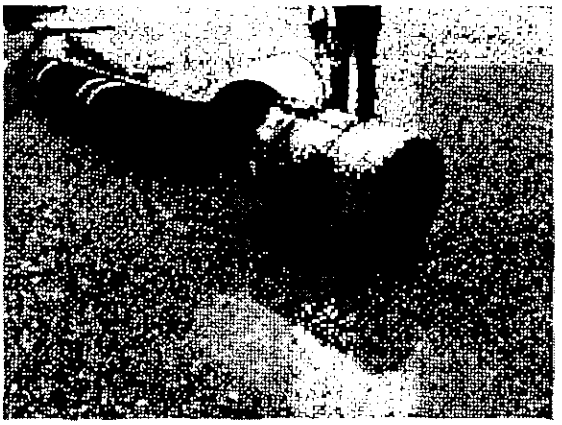
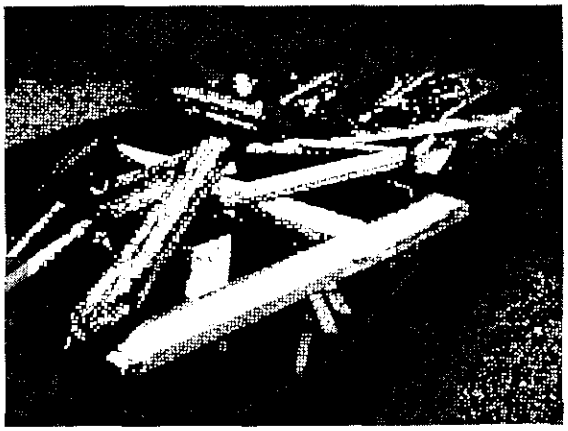


Fig 5 (LEFT): Empty propane tanks should not accumulate in the yard. This drum appears to have leaked and there has been no clean-up of residuals. Drums which contain liquids or powders must be labeled and should always be stored in secondary containment. Empty drums may be stored out of containment, but like the propane tanks, should not accumulate.

Fig 6 (RIGHT): Empty drums knocked over.



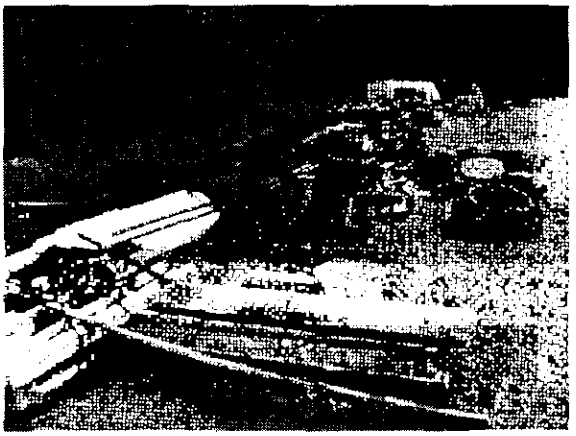


Fig 7 (LEFT): Bins for scrap metals are filled with water. The contaminated water then leaks out from these bins. It is imperative that these bins are tarped or stored somewhere away from storm water.

Fig 8 (RIGHT): Scrap should not accumulate to this extent. Find a way to limit scrap storage on-site.

Fig 9 (LEFT): Spills in storage buildings should be cleaned up as soon as possible and not left to sit.

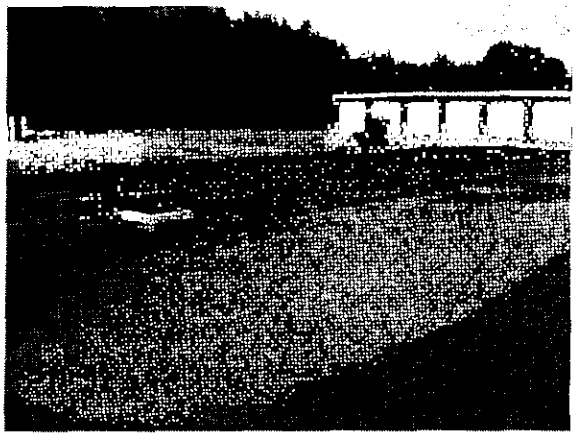


Fig 10 (LEFT): This bioretention cell has become overgrown with weeds and is not properly functioning. The cell needs to be replanted with the proper plants and maintained fittingly.

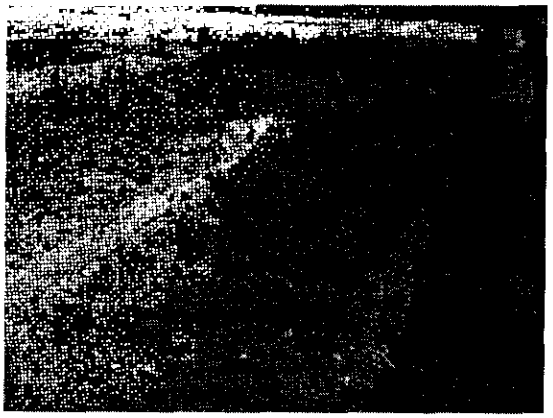
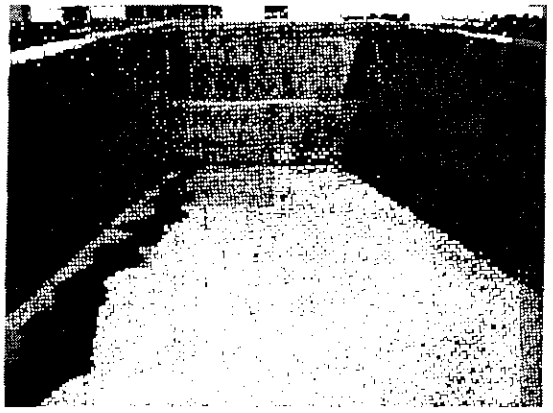


Fig 11 (LEFT)/ 12 (RIGHT): This swale preceding the detention basin needs to be stabilized. Sediment from the stockpile in figure 11 is draining right to the basin along with the rest of the runoff from the swale itself.



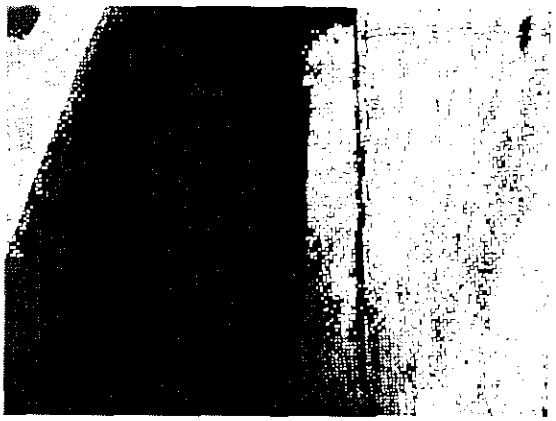


Fig 13 (LEFT)/ 14 (RIGHT): The dewatering process for catch basin cleanings and street sweepings is an overall good practice. The maintenance staff should regularly clean the drain as seen in figure 14.

Cemetery Maintenance Facility Evaluation

MS4 Maintenance Facility Field Inspection Worksheet

Permittee: The City of Oberlin	
Address of facility: 455 Morgan St., Oberlin, OH *Cemetery Maintenance Facility*	**Size of facility: Unknown**
Date of visit: June 11, 2009	**Time of visit: 12:00p.m.**

Provide the name(s) and title(s) of permittee staff present during inspection

Name	Title
Dennis Cuthbertson	*Superintendent of Building and Grounds*
Jeff Baumann	*Public Works Director*

Evaluator Observations:

SWPPP or stormwater plan	
Has the maintenance facility developed a SWPPP or stormwater plan?	**Not at this time. The city will need to develop a SWP3 for NPDES permit #OHQ000002 within 2 years of permit renewal.**
Does the plan include a site map, list of pollutant sources, BMPs, and maintenance procedures?	**N/A. This is a required component of the SWP3 when it is developed.**
Does the permittee conduct and document periodic inspections of the facility?	**NO. See Interview.**
Are storm drains labeled and free of debris?	**NO. Drain near parking area is covered in grit. This should be cleaned up and some sort of inlet protection should be used.**
Vehicle maintenance, fueling and washing	
Are vehicle maintenance activities conducted in a designated place not exposed to stormwater?	**YES. Small maintenance activities are done (blade repair/ small fluid changes) in a small garage with no floor drains.**
Are fueling stations properly designed with spill kits nearby?	**NO. The fueling station is mobile and the truck is parked outside. The vehicle should be under a roofed area and a spill kit should be nearby ON-SITE.**
Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer?	**YES. Vehicles are rinsed outdoors and water drains right to storm drain. It is suggested that city rinse vehicles in a grassy area away from the storm drains or at the Service Complex in the designated wash area.**
Material storage	
Are all materials that are potential stormwater contaminants stored under cover or in secondary containment?	**There is a chip pile on the property adjacent to a stream. Pile should be tarped and silt fenced (sediment controls should be enacted). All scrap in yard not in use should be disposed of or recycled.**
Hazardous waste management	
Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff?	**NO. The used oil needs to be on a containment pad and labeled "Used Oil."**
Waste management	
Are waste bins covered with waste properly disposed in containers?	**NO. The dumpster in back needs to be lidded.**
How is landscape waste stored?	**See notes.**
Spill response	
Does the facility have a spill response plan, and are spill kits readily available?	**NO. Spill kit must be present and clearly labeled.**
Employee training	
What type of stormwater training does maintenance staff receive?	**See Interview.**

Notes or additional information:

Storm Drains

Although they were installed to address a problem with run-on, the trench drains out in front of the garage area can act as a conduit for pollutants if a spill were to occur. A strong spill response plan is required. Spill containment berms across the garage entrances can also address this concern.

Vehicles should not be rinsed on the gravel lot. This practice results in the discharge of grass clippings and oil and grease to the catch basin to which the lot drains. Rinsing operations should be moved to a grassy area away from the catch basin or other storm water conveyance system. For washing purposes, take all vehicles to the washing station at the Service Garage.

Material storage

The storage of old scrap behind the garage and on the side of the building should be limited. Scrap not in use should be disposed of or recycled to limit runoff from these items.

Landscape materials were found in the dumpster out back. All yard waste should be stored separately in a contained area and taken to a composting facility.

City of Oberlin MS4 Program Audit

Municipal Operation Photos

Cemetery Maintenance Facility

Location: 455 Morgan St.
Date Photos Taken: June 11, 2009
Taken by: Lindsie MacPherson

Fig 1: The parking area for vehicles is full of sediment, which leads directly to the storm drain on the right side of the building. The rinsing of vehicles is also carried out in this area. The staff was told to terminate this practice and either rinse in a grassy area or go the washing station at the Service Complex. The mobile fueling station is also stored in this lot and should be moved to a roofed area where runoff will not drain directly to the MS4 system.

Oberlin Municipal Power & Light Facility Evaluation
MS4 Maintenance Facility Field Inspection Worksheet

Permittee: City of Oberlin	
Address of facility: 289 Professor St., Oberlin, OH *Oberlin Municipal Power and Light*	**Size of facility: Unknown**
Date of visit: June 11, 2009	**Time of visit: 12:45p.m.**

Provide the name(s) and title(s) of permittee staff present during inspection

Name	Title
Steve Dupee	***Director***
Jeff Baumann	***Public Works Director***
Steve Wilson	

Evaluator Observations:

SWPPP or stormwater plan	
Has the maintenance facility developed a SWPPP or stormwater plan?	**NO. The city must submit an NOI to obtain coverage under the Ohio EPA General Storm Water NPDES Permit for Industrial Activities #OHR000004 and develop and implement an SWP3 within 180 days.**
Does the plan include a site map, list of pollutant sources, BMPs, and maintenance procedures?	**N/A since there is no permit and no plan, but these are required components of an SWP3 for an industrial facility.**
Does the permittee conduct and document periodic inspections of the facility?	**NO. See Interview.**
Are storm drains labeled and free of debris?	**NO. Drains in parking lot area of old maintenance building are full of sediment and need to be cleaned out.**
Vehicle maintenance, fueling and washing	
Are vehicle maintenance activities conducted in a designated place not exposed to stormwater?	**If drains in the Tech Services Building lead to sanitary then the vehicle maintenance may be conducted in that building. Otherwise a place will need to be found away from storm drains to do vehicle maintenance or they can be taken to the General Maintenance Division's Service Complex for maintenance.**
Are fueling stations properly designed with spill kits nearby?	**Fueling station is no longer in use. Is a remnant when facility was the service complex too. Residual fuel in tank should be used up or transferred to fuel station at the new service complex. There is no dike around the fuel tank, although it is double-walled. A spill kit should be located nearby until the tank is empty.**
Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer?	**YES. See Notes. (Potential problem).**
Material storage	
Are all materials that are potential stormwater contaminants stored under cover or in secondary containment?	**NO. See Notes.** **Fuels used to operate power plant are kept within secondary containment with berming and curbing to prevent discharges.**
Hazardous waste management	
Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff?	**Used oil should be labeled as such: "Used Oil."**
Waste management	
Are waste bins covered with waste properly disposed in containers?	**NO. The trash dumpster in the parking lot area needs to be lidded.**
How is landscape waste stored?	**See Interview.**

Spill response	
Does the facility have a spill response plan, and are spill kits readily available?	**YES. There is a spill response plan in place.**
Employee training	
What type of stormwater training does maintenance staff receive?	**See Interview.**

Notes or additional information:

Storm Drains

Oil is stored in the basement of the main building. The drains in the basement lead to an oil/water separator and then to the storm sewer. Floor drains in this area should be routed to sanitary sewer or capped. City states that caps are usually in place except when the floor is washed. Please note that you are not authorized to discharge washwater from this facility. Dry cleaning methods should be implemented.

Storm drain system has not been cleaned in a noticeably long time. The parking lot inlets are full of sediment from the unprotected aggregate stockpiles in the yard. Aggregate is used for various construction projects in the City. It would be a good practice to protect these drains with inlet protection and tarp the stockpiles when not in use.

Also, the trench drain in the Truck Barn is connected to the MS4 system and needs to be connected to sanitary sewers or disconnected altogether if not in use.

There is also a green tint to the storm water that puddles in the lot. It may be necessary to investigate the source of this color.

Material Storage

It is a good practice to continue to dispose of scrap and not accumulate waste in the yard. The oil-filled surface breaker found on the lot should be drained of all fluids before being stored in the yard. The dumpster of scrap wire should be tarped and the E-waste needs to be stored inside until it can be recycled.

There was also an unlabeled drum of mineral spirits outside the main building which needs to be labeled and stored inside on a spill containment pad. If it cannot be stored indoors, it must be kept within secondary containment and protected from rainfall. In addition, the spill response plan must provide measures to address spills. Employees must be trained on these spill response measures.

Vehicle Washing

Currently, the City still washes vehicles at this facility outdoors with surfactants. Vehicle washing also occurs in the Tech Service Building where floor drains appear to be connected to the MS4. Either scenario results in an illicit discharge to the MS4. Do not wash vehicles outside at this facility. Vehicles should be taken to the wash station at the General Maintenance Division's new Service Complex on Hill Creek Rd. Other options include taking vehicles to a commercial wash facility or establishing a wash station (with connection to sanitary sewers) at the Oberlin Power and Light facility.

Oil Vapor Vents

Engine crank case vacuum vent for Engine #5 is not operating and leaking oil. The vacuum vents for the other engines also show evidence of oil staining in and around them. It is believed that the staining occurs when oil vapor condenses in these vents. Attempts are made to collect vapors, but the system must be improved to prevent vapors from condensing onto the building or adjacent pavements where storm water can contact them and convey oil to the MS4.

City of Oberlin MS4 Program Audit

Municipal Operation Photos

Oberlin Municipal Light and Power Plant

Location: 289 Professor St.
Date Photos Taken: June 11, 2009
Taken by: Lindsie MacPherson

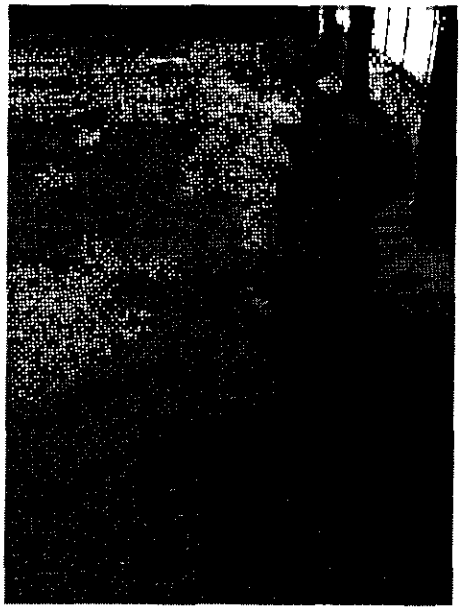


Fig 1 (LEFT): The drum of mineral spirits needs to be stored inside or in some sort of secondary containment.

Fig 2 (RIGHT): Sediment is being carried straight to the storm drain from the aggregate stockpiles in the central parking area. The city needs to set up some sort of inlet protection around the drain and containment for the stockpile.

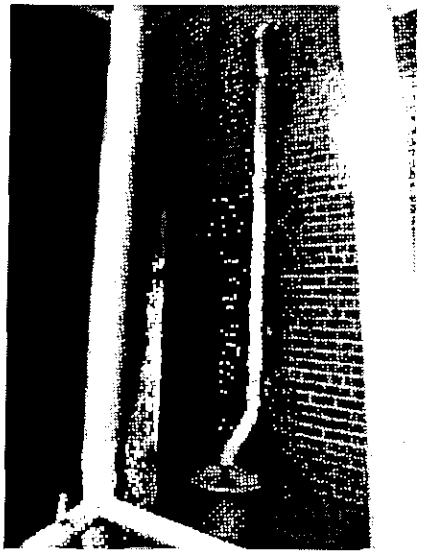


Fig 3 (LEFT): The oil vapor vent for engine #5 is showing major signs of leakage. Because the engine is no longer in use, it would be a good practice to abandon the vent and clean the surrounding area, avoiding runoff into the storm drains nearby. The system to capture vapors must be improved for vents from operating engines.

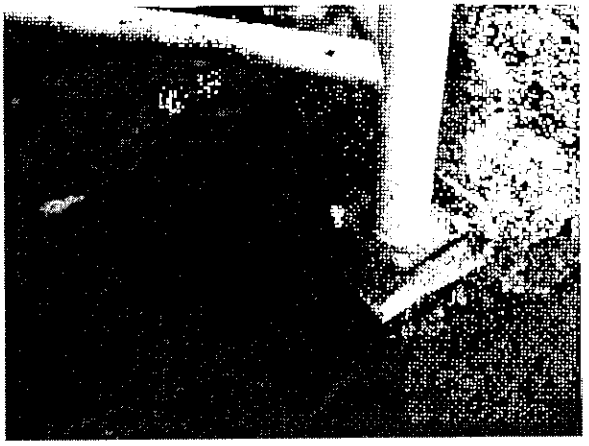


Fig 4 (LEFT): Rust from the above tank is mixing with storm water runoff and leaking right into the MS4 system. The tank may need to be repainted, or the city needs to find a way to contain the rust runoff.

Fig 5 (RIGHT): The maintenance staff is unsure as to where the drain in the Tech Services Building leads. If the drain leads to the MS4 system, it may be wise to cap it off.

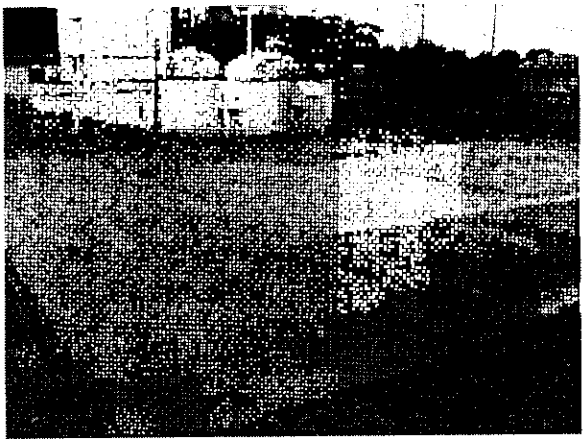


Fig 6 (LEFT)/ 7 (RIGHT): Storage area for fuels used to operate the power plant. The area is properly bermed, but there is a drain in the NE corner of the bermed area. When developing the SWP3 for this facility, procedures must be incorporated into the plan to keep the drain plug closed during normal operation and to inspect the runoff contained within the berm to determine the appropriate course of action to discharge this runoff. Absorbents should be used to remove any visible sheens before runoff is released.

Yard Waste Composting Operation Evaluation

MS4 Maintenance Facility Field Inspection Worksheet

Permittee: City of Oberlin	
Address of facility: 44461 S.R. 511 E., Oberlin, OH *Oberlin Composting Facility*	**Size of facility: Unknown**
Date of visit: June 11, 2009	**Time of visit: 3:30p.m.**
Provide the name(s) and title(s) of permittee staff present during inspection	
Name	**Title**
Jeff Baumann	***Public Works Director***
Evaluator Observations:	
SWPPP or stormwater plan	
Has the maintenance facility developed a SWPPP or stormwater plan?	**Not at this time. The city will need to develop an SWP3 per NPDES permit #OHR000004 within 180 days of permit coverage.**
Does the plan include a site map, list of pollutant sources, BMPs, and maintenance procedures?	**N/A at this time, but this is a required component of NPDES permit #OHR000004.**
Does the permittee conduct and document periodic inspections of the facility?	**NO. See Interview.**
Are storm drains labeled and free of debris?	**N/A. No drains. Drainage via natural topography.**
Vehicle maintenance, fueling and washing	
Are vehicle maintenance activities conducted in a designated place not exposed to stormwater?	**N/A. No vehicles on site.**
Are fueling stations properly designed with spill kits nearby?	**N/A. No fueling station.**
Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer?	**N/A. No vehicle washing at this facility.**
Material storage	
Are all materials that are potential stormwater contaminants stored under cover or in secondary containment?	**No. Leachate discharges from compost piles are not controlled. Spoils from various municipal construction and maintenance projects are stored here without controls.**
Hazardous waste management	
Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff?	**N/A. No hazardous materials are stored at this facility.**
Waste management	
Are waste bins covered with waste properly disposed in containers?	**N/A. There are no waste bins on site.**
How is landscape waste stored?	**SEE NOTES.**
Spill response	
Does the facility have a spill response plan, and are spill kits readily available?	**No. Spill response plan may be a component of the SWP3.**
Employee training	
What type of stormwater training does maintenance staff receive?	**See Interview. This facility does not have dedicated staffing.**

Notes or additional information:

The city is in violation of Ohio Revised Code 6111.04 and Ohio Administrative Code 3745-39-04. There is no record of an NPDES permit for stormwater discharges associated with industrial activity and no Storm Water Pollution Prevention Plan (SWP3). The city should submit a notice of intent (NOI) for the Ohio EPA General Stormwater NPDES Permit for Industrial Activities #OHR000004. A SWP3 will also need to be developed for the compost facility within 180 days of submittal.

There are no controls or containment procedures for leachate from the compost piles. An unpermitted discharge of leachate from the piles is entering a drainage ditch along the access road, which is a tributary to Plum Creek. BMPs need to be implemented to prevent discharges such as leachate. Most composting facilities will segregate leachate from storm water runoff and collect it for reuse using berms and holding ponds around piles. Leachate which cannot be recycled will require treatment prior to discharge. This typically means providing a connection to sanitary sewers or placing leachate in a holding tank for transport to a treatment facility. A permit-to-install (PTI) from Ohio EPA would be required for a holding tank.

Spoils from construction projects are also stored on site and need to be removed from facility or seeded and stabilized.

City of Oberlin MS4 Program Audit

Municipal Operation Photos

Oberlin Composting Facility

Location: 44461 S.R. 511 E.
Date Photos Taken: June 11, 2009
Taken by: Lindsie MacPherson

Fig 1 (LEFT): Yard waste is just thrown in piles with no controls or procedures.

Fig 2 (RIGHT): The piles of compost are not organized or controlled in any particular form to properly drain leachate to sanitary.

Fig 3 (LEFT)/ 4 (RIGHT): Leachate is draining into a small ditch along the access road (behind the compost piles), which is a tributary to Plum Creek.

Fig 5 (LEFT): Shows the color of the runoff from the piles, verifying that these puddles are indeed a leachate.

Fig 6 (RIGHT): A photo of the drainage ditch along the access road, behind the compost piles.