3GQ0008220100610

LORAIN	ELYRIA	CITY OF ELYRIA	3GQ00082	2010/06/10	MACPHERSON, LINDSIE

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Environmental Protection Agency

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

June 9, 2010

RE: LORAIN COUNTY
CITY OF ELYRIA
INDUSTRIAL STORM WATER
COMPOSTING OPERATIONS AT ELYRIA
CITY MAINTENANCE GARAGE

Mr. Robert G. Madden
Madden Brothers
66 Pearl Road
Brunswick, OH 44212

NOTICE OF VIOLATION

Dear Mr. Madden:

On June 2, 2010, while conducting an inspection of the City of Elyria municipal storm water management program, Dan Bogoevski and I noted that Madden Brothers is operating a composting facility on property leased from the City and located at 851 Garden Street, Elyria, OH. A review of the operations at this facility indicated that leachate generated by composting activity is being contained on site, re-circulated to the compost piles or stored for off-site disposal in a holding tank. However, we noted that there are storm water discharges associated with fueling activities, yard waste storage areas (including the yard waste drop-off area available to City residents), and chipping operations. No runoff controls were being provided for these areas of the facility.

As such, it appears that storm water runoff from the above referenced facility is subject to the National Pollutant Discharge Elimination System (NPDES) Permit program. Composting is an industrial activity categorized by Standard Industrial Classification (SIC) Code 2875: Fertilizers, Mixing Only. Facilities categorized by SIC Code 2875 are defined as an industrial activity under the Ohio EPA General Storm Water NPDES Permit for Industrial Activities #OHR000004 and Ohio Administrative Code 3745-39-04. Facilities with these operations must assure that storm water runoff from their property complies with the requirements of the NPDES permit.

A review of our records does not indicate that Madden Brothers has applied for NPDES permit coverage. Please be aware that discharging storm water without an NPDES permit is a violation of Ohio Revised Code 6111.04. Violations of ORC 6111 are punishable by fines of up to $10,000 per day of violation.

To obtain NPDES permit coverage, you must develop a Storm Water Pollution Prevention Plan (SWP3) and submit the enclosed Notice of Intent (NOI). A vicinity map showing the location of your site on 8.5" x 11" paper and a check for the permit fee must accompany the NOI. Send completed materials to:

Ohio EPA
Office of Fiscal Administration
P.O. Box 1049
Columbus, OH 43216-1049

The permit fee for industrial storm water general permits is $350. Checks should be made payable to the Treasurer of the State of Ohio.

Storm Water Pollution Prevention Plan (SWPPP)

The primary requirement of the NPDES permit is development and implementation of the SWPPP. The SWPPP must:

- Identify pollutants which may come into contact or otherwise contaminate storm water runoff.
- Provide a map of the site indicating the location of pollutants and drainage patterns.
- Identify Best Management Practices (BMPs) to eliminate or minimize the exposure of those pollutants to storm water, including but not limited to: protecting pollutants from storm water runoff, run-on or snow melt; containment structures; good housekeeping; preventative maintenance; spill prevention and response procedures; and sediment and erosion control.
- Provide a protocol for regularly inspecting areas where pollutants are stored, processed or otherwise handled.
- Provide a protocol for correcting problems revealed by those inspections.
- Provide a certification that there are no non-storm water discharges from the facility,
- Identify a Pollution Prevention Team whose responsibility it is to implement and evaluate the effectiveness of the SWPPP.

Facilities are required to conduct an Annual Site Compliance Evaluation and amend the SWPPP as necessary to address problems or changes in operations which may affect the quality of storm water runoff from the facility. Guidance on developing an SWPPP for industrial activities can be found on the US EPA's Web site at www.epa.gov/npdes/stormwater/indust.

You are directed to submit the NOI for NPDES permit coverage no later than June 18, 2010. If you feel that you have received this letter in error or do not discharge storm water associated with industrial activity, please submit a letter of explanation no later than this same date. Once developed, a copy of the SWPPP should be sent to my attention, but no later than July 12, 2010. Madden Brothers will continue to be in violation of ORC 6111 until NPDES permit coverage is obtained and the SWPPP is implemented.

If you have any questions, please contact me at (330) 963-1164.

Sincerely,

Lindsie MacPherson
Assistant to the District Engineer
Division of Surface Water

LM/mt

cc: William M. Grace, Mayor, City of Elyria
Jim Hutchson, Deputy Safety Service Director, City of Elyria
Mukund Moghe, Engineer, City of Elyria
Clarissa Gereby, Ohio EPA, DSIWM, NEDO

Environmental Protection Agency

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

June 10, 2010

RE: LORAIN COUNTY
CITY OF ELYRIA
MS4 INSPECTION FINDINGS MCM#6-POLLUTION PREVENTION FOR MUNICIPAL OPERATIONS

Mr. Mukund R. Moghe
City Engineer
City of Elyria
131 Court Street, Suite 303
Elyria, OH 44035

Dear Mr. Moghe:

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) OHQ000082*BG and Ohio Administrative Code 3745-39.

On June 2, 2010, Ohio EPA met with you and other representatives of the City of Elyria 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 renew NPDES permit coverage for storm water discharges associated with industrial activity from the wastewater pollution control plant.** This is a violation of Ohio Revised Code 6111.04 and Ohio Administrative Code 3745-38-09. The City has developed an SWP3 for the facility but records show that the City of Elyria WWPCP has not renewed their coverage under the Ohio EPA General Storm Water NPDES Permit for Industrial Activities since its original issuance in 2003. As with any other NPDES permit, coverage must be renewed once every 5 years or upon reissuance of the general permit and notification by Ohio EPA. Please submit an NOI and the $350 renewal fee to renew the NPDES Permit. Comments on the SWP3 for the WWPCP facility have been provided in the Facility Inspection Worksheet for that facility.

Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087-1924

330 | 963 1200
330 | 487 0769 (fax)
www.epa.ohio.gov

- **Failure to provide controls for reducing or eliminating the discharge of pollutants from maintenance and storage yards at the Central Maintenance Complex and Parks and Recreation Garage.** This is a violation of Part III.B.6.d.iii.2 of the Small MS4 NPDES Permit #OHQ000002 and Ohio Revised Code (ORC) 6111.04 and 6111.07. This violation was noted for the following operations at maintenance and storage yards:

    - Failure to prevent the discharge of leachate from stockpiles of yard waste, landscape material, mulch piles, catch basin cleanings and compost.
    - Failure to direct wastewater generated during mower washing operations to a sanitary sewer system or other wastewater treatment system, or otherwise prevent its discharge.
    - Failure to provide secondary containment around storage drums of used antifreeze and other chemicals stored outdoors at CMG.
    - Failure to provide cover over solid waste dumpsters, e.g., lids or tarps, so as to prevent storm water from contacting solid waste and creating leachate.
    - Failure to implement an inspection and maintenance program for garbage trucks and other City vehicles to prevent oils and other vehicle fluids from entering the MS4.
    - Failure to provide complete coverage of salt piles outside the shed at the Parks and Recreation Garage.

  The MS4 permit does not authorize the city to discharge leachate or wastewater, thus controls for these unauthorized discharges must be implemented immediately. Further, measures must be taken to minimize the potential for discharges of pollutants to the MS4. Implementing practices such as secondary containment and lidded dumpsters achieves this goal. Please review the comments within the attached *Municipal Storm Water Program Evaluation* and *Maintenance Facility Field Inspection Worksheets* regarding these operations.

- **Failure to develop a map showing the discharge location of all the individual Home Sewage Treatment Systems (HSTSs) discharging to the City's MS4.** This is a violation of Part III.B.3.c.ii of the Small MS4 NPDES Permit #OHQ000002 and Ohio Revised Code (ORC) 6111.04 and 6111.07. The City needs to develop this map to include details on the type and size of conduits/ditches in your MS4 that will receive discharges from HSTSs, as well as the water bodies receiving the discharges.

- **Failure to submit a Notice of Termination within 45 days of reaching final stabilization on municipal construction projects.** This is a violation of Part IV.A of NPDES permit #OHC000003. Our records show that the City of Elyria has 2 active projects permitted under the Ohio EPA General Storm Water NPDES Permit for Construction Activities but indicated during the interview that both projects were completed and have reached final stabilization. Please submit an NOT for all projects that are complete or no longer viable (see attachments for list).

- **Failure to ensure adequate long-term operation and maintenance of public/ private stormwater management facilities.** This is a violation of Part III.B.5.d of the Ohio EPA General Storm Water NPDES permit and ORC 6111.04 and 6111.07. The City of Elyria does not own any public stormwater management facilities at this time, but when maintenance of the swales along SR 57 is handed over to the City, it will be your responsibility to ensure their long-term operation and maintenance. In addition, the City is responsible to ensure the long-term maintenance of any privately-owned post-construction storm water management structures on sites developed since April 21, 2003. 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, (c) establishing a system to track maintenance activities by the responsible party, and (d) taking enforcement action if maintenance is not performed by the responsible party as required by the maintenance plan.

- **Failure to develop an employee training program on how to reduce the discharge of pollutants from the MS4.** This is a violation of Part III.6.a of the NPDES permit and ORC 6111.04 and 6111.07. Although some training has been offered to WWPCP staff in 2009, the City has not developed the required staff training program expected under the MS4 program. The City Engineer and Project Engineer have also gone through some training, but these actions do not constitute a training program if information is not shared or provided to staff that must implement the practices required to comply with the NPDES permit, e.g., CMG staff. Be aware that the NPDES permit requires your training program to provide at least one training event per year. Training opportunities involving Ohio EPA can be found at www.epa.ohio.gov/ocapp/storm_water.aspx. Training events provided by Ohio EPA and the materials used at those events are archived at this site and can be used by MS4s to train their staff. US EPA has an archive of MS4-related training at www.epa.gov/npdes/training. Be sure to include storm water pollution prevention training in any new employee training program, where appropriate.

Deficiencies:

- A storm water pollution prevention plan (SWP3) has not yet been developed for the Central Maintenance Complex, the Parks and Recreation Maintenance Garage, or the Brookdale Cemetery maintenance area. Per Part III.B.6.c of the NPDES permit, these plans must be developed and implemented by June 2011.

- The City has not developed checklists to inspect the Central Maintenance Complex, Parks and Recreation garage and yard, or the Brookdale Cemetery maintenance area. We strongly recommend the creation of storm water inspection checklists for these facilities to standardize inspections and remind inspectors of the critical areas that must be reviewed during an inspection. Checklists should be included in the SWP3s for facilities that require one.

- The storm water program manager does not appear to have the authority needed to ensure implementation of BMPs at all municipal operations. Although the Service Director has oversight over all municipal operations, he has little day-to-day involvement with the municipal storm water program. A storm water contact has not been designated for each municipal facility subject to this program. The City of Elyria should review the organizational structure for the municipal storm water program to ensure consistent program implementation across department boundaries. At a minimum, we recommend that a storm water contact be designated for the Central Maintenance Complex, Parks and Recreation Garage, and the Brookdale Cemetery Maintenance Area that will have the authority and knowledge to ensure implementation of the SWP3s associated with these facilities. Please be aware that Part IV.C.1 of the NPDES permit requires that a Table of Organization naming points of contact be submitted with your annual report, starting with the report that was due April 1, 2010.

- The City does not currently have one cohesive MS4 map. The City should develop a system to combine all the outfall maps and MS4 maps into a master map that will contain all the details required by the NPDES permit. To meet the mapping obligations of NPDES Permit #OHQ000002, i.e., the MS4 permit in effect from 2009-2014, the map must show catch basins and publicly-owned storm sewers, ditches and storm water management facilities (including publicly-owned post-construction BMPs). In addition, the map must show privately-owned storm water management facilities constructed as post-construction BMPs for new development or redevelopment which has occurred since April 21, 2003. Further, we noted that the current map does not show any MS4 outfalls on streams other than the Black River and its two main branches. Please note that there may be more outfalls along the tributaries leading to the Black River. This needs to be investigated and added to the City's outfall map.

- The City does inspect certain portions of the MS4, but this is generally done on a complaint basis only. The operation and maintenance program for the MS4 can be improved by conducting inspections on a proactive basis per a schedule developed by the street or sewer department. Please be aware that Part III.B.6.d.iii.1 of the NPDES permit expects that the City will develop maintenance schedules for all portions of the MS4.

- The City does not appear to track the amount (in tons) of street sweepings and catch basin cleanings removed from the MS4. Please be sure to track these amounts, if you have not yet begun to do so, as it is required to be reported on the new Annual Report form.

- The City did not provide me with a copy of a pesticide, herbicide and fertilizer application plan. The development of a formal application plan is an important tool in minimizing the application of these storm water pollutants. Please provide me with an application plan.

- The City has not developed contract language to require storm water BMP implementation when a third-party provides municipal operations on behalf of the City. Contract language must be added to all contracts with such parties, e.g., operators that provide street sweeping services or pesticide application. Further, we recommend periodic inspection of their operations to assure that they are implementing BMPs.

- The City has not provided any storm water pollution prevention guidance materials to field staff that they can take out with them in the field. By making materials available to staff at the field level, implementation of storm water BMPs should improve.

- The City has not adopted sensible salting practices. Because there are no practical and effective BMPs to treat or collect road salt once it has been applied, the focus must be on source control. Reducing the amount of salt applied is critical to meeting this goal. Please refer to the sensible salting practices developed by the Cuyahoga County Service Directors' Association:

    - Limited salting during the late evening/early morning hours. During periods of snowfall between the hours of approximately 11pm – 4am, the effectiveness of salting is minimal due to low traffic volumes. The goal of the service department during this timeframe will be to provide "passable roadways," defined as roadways that are "free from drifts, snow ridges and as much ice and snow pack as is practical; roadways which can be traveled safely at reasonable speeds." Intersections, hills, curves and bridges will be salted on main roads during these hours. Plowing and salting of main roads beginning at 4am will provide adequate time to prepare the roads for the rush hour.

    - Limited salting during heaving snow events. During periods of 1" of snow or more per hour, main roads will be plowed as frequently as possible, but will only be salted at intersections and stop signs, hills, curves and bridges. "Spot salting," defined as "intermittent spreading of salt at 150 ft. intervals," will also be utilized when practicable.

    - Limited salting on secondary roads. Secondary roads will be plowed as often as possible, but will only be salted within 200 feet from each intersection and stop signs, hills, curves and bridges. Spot salting will be used on secondary roads when practical.

    - Proper training of employees and communication of this policy. Snow removal crews have been properly advised of these sensible salting practices and are instructed to follow the guidelines set forth herein.

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 July 14, 2010.** Please note that this response does not replace the requirement to submit an Annual Report. Your annual report for 2010 will be due on April 1, 2011.

If you have any questions, please contact me at (330) 963-1164 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: William Grace, Mayor, City of Elyria (w/ enclosure)
Jim Hutchson, Deputy Safety Service Director, City of Elyria (w/ enclosure)
Terry Korzan, WWPCP Superintendent (w/ WWPCP enclosure)

ec: David Oakes, City of Elyria Health Department
Chuck Allen, Ohio EPA, DSW, NEDO

Municipal Storm Water Program Evaluation

MS4 Maintenance Component Worksheet

Date of Evaluation	June 2, 2010
Evaluator Name, Title	Lindsie MacPherson, DSW, NEDO
MS4 Permittee	City of Elyria

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**
Mukund R. Moghe City Engineer	City of Elyria Engineering Department	(440) 326-1444 mmoghe@cityofelyria.org
Aaron Klein Project Engineer	City of Elyria Engineering Department	(440) 326-1444 aklein@cityofelyria.org
Terry Korzan Superintendent	City of Elyria Waste Water Pollution Control	(440) 366-2211 (Ex. 100) tkorzan@cityofelyria.org
Frank Gustoff Director	City of Elyria Office of Parks & Recreation	(440) 326-1500 fgustoff@cityofelyria.org
Gary Dickerson Street Superintendent	City of Elyria Street Department	(440) 322-3129 gdickerson@cityofelyria.org
David Oakes Environmental Health Director	Elyria Health District	(440) 284-1561 doakes@elyriahealth.com
Stacey Faile Consulting Engineer	AECOM	(216) 910-1944 Stacey.faile@aecom.com

MS4 Mapping	
Interview Questions	**Response**
Outfalls and receiving waters mapped? Catch basins? Pipes, ditches, other conduits? Public stormwater facilities (BMPs)? Private stormwater facilities (BMPs)?	YES NO YES NO NO
How maps are used (i.e. tracking illicit discharges)?	The City evaluates the maps when an issue such as a spill arises so they can locate where the spill will flow through the MS4 and remediate the problem. For example, when a gas tank leak occurred the City evaluated the maps of the area to identify if storm sewers existed in the area and where the leak would go. The WWTP also refers to the maps when answering questions from citizens. NOTE: Map is not one cohesive map. They have a number of different sheets with various details that will have to be pieced together.

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

Notes

MS4 Mapping

The City of Elyria has a fairly complicated mapping system with various details required for the NPDES Permit on different maps. *The City needs to develop a system to combine these maps into a master map that will contain all the details* required for their permit. To meet the mapping obligations of NPDES Permit #OHQ000002, i.e., the MS4 permit in effect from 2009-2014, the map must show catch basins and publicly-owned storm sewers, ditches and storm water management facilities (including publicly-owned post-construction BMPs). In addition, the map must show privately-owned storm water management facilities constructed as post-construction BMPs for new development or redevelopment which has occurred since April 21, 2003.

After reviewing the City's maps it was noted that they have only mapped the 157 outfalls that discharge to the main stem of the Black River as well as the East and West Branches. *The City needs to further investigate the tributaries that feed the Black River for other points of outfall.* The present outfall map was developed by Metcalf & Eddy AECOM for the City's dry weather outfall survey. The map marks each outfall as either a sampled outfall with a low/high ammonia bacteria count or a non-sampled outfall due to dry weather during survey. Pipes, ditches, and conduits of the City are 99% mapped with the exception of certain areas of the City where maps have been misplaced. The City does not currently own any public storm water management facilities to map, but when the swales along SR 57 are completed and turned over to the City this is an example of the types of facilities that must be a part of the City's MS4 map. Once again, the City will need to combine all these details into one master map and finish mapping all outfalls, catch basins, pipes, ditches, conduits, and public/ privately owned storm water facilities by the end of the permit term in 2014.

Identifying the Location of Discharging Home Sewage Treatment Systems (HSTSs)

The City of Elyria does not have a map showing the points of discharge from the HSTSs to the MS4. The City Health Department did provide a list of addresses, but no map was created. These are largely

Notes
reflective of the systems installed since 1980's. Anything earlier was approved by the Lorain County Board of Health, so records are spottier. Please be aware that these discharging systems are considered illicit discharges to the MS4. Permit #OHQ000002 requires the City to work with LCGHD to determine which of these systems are not operating as designed and intended. For systems not operating as designed and intended, LCGHD must use the provisions in Ohio Revised Code 6117.51 to require connection to the sanitary sewer system where it is legal, feasible and economical to do so. For systems that cannot be eliminated through connection to sanitary sewers or the installation of a soil absorption system, the property owner must be notified to contact Ohio EPA and pursue coverage under an appropriate NPDES permit. **Illicit Discharge Detection** The City has completed their dry weather screening of all 157 outfalls identified along the Black River. It was noted that 10 illicit discharges were detected, 7 were eliminated, and 3 are still being investigated. One of the illicit discharges eliminated was a house cross-connection (sanitary to storm) and the City immediately had the problem corrected. Another was at the Cedar Street duplex where a plumber did not tie in half of the duplex to sanitary. Two of the remaining issues (#505 and #615) are still being sampled to verify that they are illicit discharges. The City is having trouble tracing the sources because they are in areas where homes have been demoed. The last illicit discharge at outfall #115 was identified to be about 50 abandoned cats living in this area of the sewers. Please be aware that although it is not required after all outfalls have already been screened, the Ohio EPA does recommend that dry weather screening be a continual, on-going process as illicit discharges can occur from outfalls where none had previously been noted.

Catch Basin Cleaning	
Interview Question	**Response**
Schedule established for inspections and cleaning?	**YES** The City has a schedule to inspect and clean all catch basins every two years. This seems to vary depending on the number of vac trucks that are up and running at the time. Some areas such as the combine sewer areas and downtown are cleaned more frequently due to infiltration and inflow into the storm sewer system. The WWPCP did not get through the whole city in 2008 and 2009 because last year one of their vac trucks was down and required $25,000 in repair. This repair is now completed.
Is cleaning and maintenance of catch basins tracked:	**YES** The City has a list of the streets where the catch basins were cleaned for each year. There is a map on the WWPCP wall to mark which CB have been cleaned. Waste manifests from BFI are located at the WWPCP that will show the amount of CB debris taken off to the landfill. The City needs to develop a summary for the amount of CB cleanings cleaned out per year.

How are spoils materials disposed of?	When vac trucks off-load, they go to two dump stations at the WWPCP. Both are dewatering pads where leachate is directed to the plant. Solids are dried and then placed in a covered dumpster to be taken to a BFI landfill.
Are storm drain pipes inspected? Proactive or only in response to blockage event?	**YES** As part of catch basin cleaning, the City will clean adjacent piping. They use the camera to verify that pipes have been cleaned. However, not sure what percentage of the MS4 system this would represent. Have cleaned every catch basin in the last 5 years.

Applicable Documents	**Reviewed**	**Obtained**
List of active municipal construction projects	**YES**	**NO**
CHECK DATABASE BEFORE INSPECTION: List of municipal projects covered under the Ohio EPA general storm water NPDES permit for construction activities		
3GC04791*AG -Abbe Rd water main replacement 1/7/2010 – 1/3/2011 Acre: 22 issued 2/10/2010 – no post-cont required for this type of project	YES	ACTIVE
3GC04759*AG -East River St. 3/8/2010 – 11/8/2011 Acre: 3.91 issued 1/7/2010 –Exfiltration trenches per ODOT specifications	YES	ACTIVE
3GC04755*AG -Middle Avenue Sanitary Sewer Phase 2 1/4/2010 – 1/3/2011 Acre: 1 issued 1/6/2010 – no post-con required for this project	YES	NOT STARTED
3GC04721*AG - Ridgeway ditch at WWTP 11/1/2009 – 5/14/2010 Acre: 1.88 issued 11/20/2009 – no post-con required for this project	YES	DONE - FILE NOTs
3GC04839*AG - W River Rd. Lift Station Rehab FM Replace and Griswold Rd. 3/22/2010 – 1/3/2011 Acre: 2 issued 3/15/2010 – need to find out what exactly this all entails...may be subject to post-construction – no additional impervious surfaces...not subject to post-construction requirements	YES	ACTIVE
3GC03668*AG -LOR-20/57-16.93/16.17 4/1/2008 – 10/31/2009 Acre: 60.30 issued 1/4/2008 – they implemented overwide swales per ODOT manual as post-con BMP	YES	ACTIVE
3GC03977*AG -Middle Ave. Sanitary Sewer 7/1/2008 – 7/1/2010 Acre 4.63 issued 6/25/2008 – no post-con required	YES	DONE - FILE NOT

Notes

Catch Basin Cleaning Schedule and Disposal

The WWPCP does storm sewer catch basin cleaning. Their schedule is to clean all catch basins every two years. They were behind for the year of 2009 due to a broken vac truck. When CBs are cleaned the City also cleans all adjacent storm water piping and cameras the area to make sure the sewers are clean and unblocked. The spoils are taken to the WWPCP and dumped onto a dewatering pad. Once they are dry, they are placed in an adjacent covered dumpster until BFI comes and takes the spoils to a landfill. This whole process is tracked in various ways. A map is located at the WWPCP for the workers to highlight which CBs on which streets have been cleaned. The City provided us with a list of

all the streets where catch basins were cleaned in 2008 and 2009. The waste manifests from BFI show the amount of spoils taken from the plant. *This information should be summarized to give a total number per year of the amount of catch basin debris clean out.* The City also tracks all the catch basin replacements and repairs done per year. We received 2008, 2009, and a partial of 2010.

Municipal Construction Projects

If construction is complete or the project is no longer viable, please submit Notices of Termination (NOTs) for these projects to close out NPDES permit coverage. The NOT and instructions can be obtained on the Ohio EPA Storm Water Program webpage at www.epa.ohio.gov/dsw/storm/stormform.aspx. As a reminder, coverage under the Ohio EPA General Storm Water NPDES Permit for Construction Activities is to be terminated within 45 days of when the project reaches final stabilization. Please be sure to incorporate this requirement into your procedures on all future projects.

Stormwater Management Facilities Operation and Maintenance	
Interview Questions	**Response**
Public facilities inspected? Frequency:	**NO** Don't own any, but will have responsibility for storm water infrastructure along SR 57 which does include post-construction BMPs.
Private facilities inspected? Frequency:	**NO**
Checklist used for inspections?	**NO** **No program exists.**
Have maintenance standards and procedures been established for these facilities?	**NO** The City stated that Lorain County is developing standards that they hope to join, but County hasn't developed any detailed standards at this point.
How is maintenance prioritized? Is data evaluated to target maintenance resources?	NO ponds, etc, but for storm sewer system, they know which areas are problematic and try to focus on them, e.g., Abbe Rd ditches aren't draining well, so they included ditch cleaning as part of road construction projects. Also, respond to complaints when drainage problems are reported.

Applicable Documents	Reviewed	Obtained
Inspection checklist	Does not exist.	

Notes
Inspections of Stormwater Management Facilities The City of Elyria does not own any public stormwater management facilities at this time, but when the swales along SR 57 are handed over to the City, it will be their responsibility to uphold the operation and maintenance of this facility. Please be aware that the City is required to ensure long-term maintenance of stormwater management facilities. Ohio EPA requires that this program include privately-owned facilities constructed since April 21, 2003, and all publicly-owned stormwater management facilities. Storm water management facilities include best management practices (BMPs) designed to treat the Water Quality Volume (WQv), otherwise improve the quality of runoff or reduce the volume of runoff generated. BMPs include structures such as bioretention cells, permeable pavements, green roofs, enhanced water quality swales, sand filters, extended detention ponds, constructed wetlands and proprietary devices (including underground structures). An acceptable post-construction BMP program consists of: 1. Plan review to assure that post-construction storm water quality BMPs are being provided, are designed per required standards and have a long-term maintenance plan 2. Tracking the location of post-construction BMPs and the party responsible for implementing the long-term maintenance plan 3. Performing an inspection to assure that post-construction BMPs are installed per the approved plan 4. Periodically inspecting or otherwise verifying that the post-construction BMP is being maintained in accordance with the long-term maintenance plan using a checklist 5. The checklist used to perform inspections should be reflective of the operation and maintenance standards established by the City 6. Taking enforcement action against the responsible party if they fail to maintain the BMP as required The City has not yet developed the robust long-term maintenance program for post-construction BMPs, which is a violation under Part III.B.5 of NPDES Permit #OHQ000002. As a reminder, Ohio EPA has required a long-term maintenance plan for all post-construction BMPs since April 21, 2003. Although it must be a stand-alone document, it is part and parcel of the Storm Water Pollution Prevention Plan (SWP3) required by the Ohio EPA General Storm Water NPDES Permit for Construction Activities. The goal of the MS4 program is to develop a local review and approval program for the SWP3. This includes post-construction BMPs and their long-term maintenance plans. These plans are required to provide a schedule for routine and non-routine maintenance tasks to be undertaken. The City must establish standards for these maintenance tasks. **NOTE:** Most communities reference standards contained in ***Rainwater and Land Development*** (ODNR, 2006) or the United States Environmental Protection Agency's Menu of BMPs rather than establish their own.

Road Maintenance	
Interview Questions	**Response**
Streets regularly swept?	YES
Frequency:	This BMP is contracted out twice a year (once in the spring and once in the fall) for curbed streets. The street department does the downtown area with their own sweeper once per week during the summer months.

Road Maintenance	
Interview Questions	**Response**
Frequency based on water quality factors (e.g. proximity to streams)?	**YES** The City focuses on CSO areas to help alleviate overflows.
How are spoils disposed of?	Street sweeping spoils are dropped off at WWPCP. They are dumped on a niche in the service road between Hillside and the administration building. Dumpsters are then loaded later after they dewater. They had to send a sample for BFI, so they are behind on getting the sweepings into the dumpsters this year. There are no controls for the runoff from the street sweepings pile but any water that leaches through is caught by the plants levee system so there is no discharge off the site. The debris collected by the Streets department is placed in a dumpster at the Central Maintenance Complex. Make sure this dumpster is covered at all times or take debris to WWPCP as well.
Does the community collect road kill? What do they do with the carcasses?	**YES** Road kill is placed inside a container and then dumped in a dumpster at the Central Maintenance Garage. **CMG is located on a landfill.**
Does the community have a leaf collection program? What do they do with the collected leaves?	**YES** Every fall, for about 6 – 8 weeks trailers pick up leaves at the curbs from residents. They are taken back to CMG. Licensed composting facility at the back of CMG. Madden Brothers leases the property from the City and operates this on behalf of the City. Leachate is pumped into tankers and disposed at the French Creek WWTP.
BMPs used during road maintenance activities? Describe types of road maintenance conducted by community staff and the BMPs used	**YES** See highlighted BMPs on handout provided to us. The City needs to formalize this information into their SWMP. The City patches holes in roads, cuts grass on City and non-maintained properties, street

Road Maintenance	
Interview Questions	**Response**
	striping, crack sealing, snow plowing, leaf collection, board up abandoned houses, apply deicers to roadways etc.
BMP guidance available to field staff?	**NO** No written training program. Nothing provided in trucks, no posters at CMG. They are in the process of developing the SWP3 for CMG (about 90% done) and they will make sure they cover these topics within the plan.
Deicers used by MS4?	**YES**
Type and amount of deicer and additives tracked? What measures are being taken to minimize the application of deicers?	**YES** Plain rock salt is used with NO additives. The City of Elyria tracks how much they buy, and compare ending inventory to beginning inventory to get an aggregate total of salt applied. Records were given to the EPA that show tonnage used per event taken from purchase orders, the total for each month and the total salt usage for each year. In 2009 they used about 5225.63 tons. There are established routes for drivers and annual training of snow plowers. They do not calibrate the spreaders. Side streets are only plowed, not salted. They only salt intersections, but some intersections are not salted at all. Gary Dickerson was referred to www.saltinstitute.org for information on sensible salting.
Sand/salt swept up after application? How soon?	**YES** Salt storage at CMG (1200 tons) and at Parks and Recreation (400 tons). Spillage outside of the dome and shed is pushed back in after the storm. There is some spillage outside the shed at the Parks and Recreation Garage. See the facility inspection for this site.
Does your community operate a snow stockpile yard to store snow that has been removed from community streets and parking lots? If YES, location of the yards:	**YES** Only periodically. The City has taken snow from downtown to CMG and let it melt there but not in a while. See Clarissa's photos. Not really a suitable location.

Road Maintenance	
Interview Questions	**Response**
Has your community considered implementing best management practices to control the discharge of pollutants from snowmelt associated with snow storage yards?	The City will think about this for next season and make sure to keep snow away from stream and when plowing the access road, plow away from stream.

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

Notes

Street Sweeping

The amount of debris collected by the contractor is kept at the WWPCP through waste manifests from BFI. The streets department does not report the quantity they collect to the WWPCP, so the total amount collected is unknown. *These totals as well as the amount of debris swept up by the streets department need to be combined for the total amount of debris swept up per year for Elyria's annual report.* Because the streets department places their sweepings in a dumpster at the CMG then this dumpster needs to be covered and inspected for leaks on a regular basis to ensure adequate containment. It may be easier for the streets department to dispose of the sweepings at the WWPCP to avoid discharging leachate from a solid waste.

The City provided the EPA with a list of the streets included in the contract to sweep their streets. The contract language for sweeping Elyria streets does include specifications on taking the debris to the WWPCP, but there are no specifics on storm water pollution prevention. *Please be sure to include language requiring pollution controls in all contracts and requests for proposal (RFPs) where the activities are a potential source of storm water pollution, should contracted staff be used in the future.* The operations of third party service providers should be reviewed periodically by the City to ensure that the required pollution controls are being implemented. Elyria contracts with O'Riley Sweeping currently, but they would go to the low bidder. No one else seems to have the sweepers that City of Elyria requires.

Flood Management	
Interview Questions	**Response**
Inventory of flood management structures completed?	N/A – do not own any
Structures been assessed for stormwater retrofit?	N/A
New structures include water quality considerations?	YES Post-construction ordinance requires it

Applicable Documents	Reviewed	Obtained
Inventory	N/A	N/A

Notes

Retrofit Opportunities

City has not thought about retrofit projects to reduce storm water volume. Elyria High School is doing a bio-swale and permeable pavement has been recommended for the Greenway Trail Plan, but this is just a

Notes
project on the drawing table at this point. All current projects should be assessed for stormwater retrofitting opportunities such as tree boxes that act as sand filters, permeable pavement, bioretention cells and enhanced swales. Retrofit projects will be a primary means of implementing post-construction BMPs in your community.

Facilities Operation & Maintenance		
Interview Questions	**Response**	
Inventory of MS4 facilities complete (i.e. facilities owned and operated by the MS4)?	**YES** List Provided	
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
• Airports	**NO**	N/A since do not operate
• Shipping Ports or Marinas	**NO**	N/A since do not operate
• Steam Electric Power Plants	**NO**	N/A since do not operate
• Wastewater Treatment Plants ≥ 1 MGD or with a pretreatment program Elyria WWPCP 1194 Gulf Road Elyria, OH 44035	**YES** *Did receive a copy of SWP3. Spill kits, spill response plan, annual site inspections all included.	**YES**
These do not need their own permit, but do have to develop an SWP3 unless noted as N/A:		
• Impound Lots – at CMG	**YES**	Include in SWP3 for CMG
• Leaf Collection Yards ✓ No discharge of leafate permitted	**NO**	N/A since do not operate
• Maintenance Yards ➢ How many do they operate? __1__ ➢ List facility names/locations: Central Maintenance Garage 851 Garden St. Elyria, OH 44035	**YES**	**NO**
• Composting Operations ✓ No discharge of leachate permitted	**NO** * Privately operated by Madden Brothers – check for industrial storm water permit coverage.	N/A since do not operate
• Solid Waste Transfer Stations or Operations	**NO**	N/A since do not operate

Facilities Operation & Maintenance		
Interview Questions	**Response**	
	Response	**SWP3 Developed?**
• Parks & Cemeteries ➢ How many in UA? __16__ ➢ List facility names/locations:	**YES**	N/A
• Parking Lots ➢ How many do they operate? __29__ ➢ List facility name/locations:	**YES**	N/A since do not operate
• Bus Terminals	**NO**	N/A since do not operate
• Vehicle Maintenance Garages ➢ How many do they operate? __3__ ➢ List facility name/locations: CMG 851 Garden St. Elyria, OH 44035 P&R Maintenance Garage 120 Floradale Ct. Elyria, OH 44035 Brookdale Cemetery MG 41600 Oberlin Ave. Elyria, OH 44035	**YES**	**NO**
Facilities inspected? Frequency:	**YES** (WWPCP only) **WWPCP** – A SWP3 has been developed for this facility. Inspections are completed annually and the 2009 inspection checklist was reviewed at the interview. All other facilities that would require a SWP3 are not inspected for storm water pollution prevention at this time. These facilities include the Central Maintenance Complex, the Parks and Recreation Service Garage, and the Brookdale Cemetery Maintenance Garage and yard.	
Checklist used?	**YES** (WWPCP only) Other facilities will come on-line when SWP3s are finalized. The City is about 90% through with developing a SWP3 for the CMG. The City needs to develop a checklist to inspect the other	

Facilities Operation & Maintenance	
Interview Questions	**Response**
	two facilities for stormwater as well. Checklists should be developed to guide inspections of all facilities with potential for Storm Water Pollutant Runoff. This will help assure that each facility is inspected thoroughly and that there is consistency between inspectors.
Staff which perform the inspections (department or agency:	Do include name of inspector on form and have trained them on SWP3 measures. **WWPCP** – S. Baytos, T. Skaugen, K. Logan, T. Nigro, and V. Tanner along with Terry Korzan are all responsible for the stormwater inspections for the WWPCP. The city needs to make sure the SWP3 for the other three facilities designates specific people to conduct the stormwater inspections.
Is there a designated stormwater contact person for each facility?	**YES** (WWPCP only) **WWPCP-** Kenny Logan and Steve Baytos Please be aware that all facilities requiring an SWP3 are required to have a Pollution Prevention Team with specific responsibilities regarding implementation of the SWP3. For other facilities, Ohio EPA recommends that a person be designated to inspect facilities periodically to assure that storm water BMPs are implemented in accordance with the SWMP. This will develop a certain level of accountability for BMP implementation at these facilities.
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?	Mechanism for staff discipline: City employees are generally represented by a union. The City must follow disciplinary procedures established in the union contract. It is a progressive disciplinary system consisting of verbal warnings, written warnings, meeting with superintendent, time off without pay and eventually termination. Please be sure that appropriate disciplinary action is taken when employees fail to follow MS4 program policies and procedures.

Facilities Operation & Maintenance	
Interview Questions	**Response**
	WWPCP had driver from another department fuel at the plant and stepped away from the station during fueling. This resulted in a spill. He was disciplined, skipped the oral warning and went straight to written reprimand in his employee file.
Parking lots owned/operated by the permitee swept? Frequency?	**YES** At this time the City only sweeps Washington Ave lot and City Hall lot. The Streets Department said they will do all other parking lot sweeping if necessary.
Do you have any combined sewer systems? If yes, do you have any combined sewer overflows? ➢ How many? **27** total locations ➢ 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?	**YES** **YES** **YES.** Report provided to Ohio EPA on an annual basis shows frequency and volume. Also have SSOs. **YES** The City's dry weather screening completed 100%. They identified 10 outfalls with illicit discharge. A NOV is sent out when an illicit is discovered. The source is given 30 days to correct. Eliminated 7 problem discharges. There are still 3 remaining outfalls with illicit discharge. Engineering Dept has records that show where the investigation stands. These remaining discharges either have an unknown/uncertain source or are being investigated further. See previous notes.
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** but camera crews do review the MS4 to note breaks and repairs that are needed. The City also monitors flow in the Black River. When they identify extra flow they trace the source. When the problem spot is located the City will regrout/repair, etc. Although the City does camera some of their MS4, there is no comprehensive program to determine the extent of inflow and infiltration (I/I) to the MS4 and to eliminate those sources that would be considered illicit discharges.

Facilities Operation & Maintenance	
Interview Questions	**Response**
	Please be sure that you are not overlooking a possible source of illicit discharge to the MS4. Your IDDE program should include a proactive I/I program.
Sewer spill and cleanup procedures in place?	YES Included in SWP3 for the WWPCP. It is really a plan for the sanitary sewer system but works for other problems as well. Fire Dept trucks are stocked with spill response materials because they are first responders.

Applicable Documents	Reviewed	Obtained
Facility inventory	YES	YES
Facility SWPPP	YES for WWTP	YES

Notes
Storm Water Pollution Prevention Plans (SWP3s) The City is required to obtain NPDES permit coverage for facilities that discharge storm water runoff associated with industrial activity and have a Storm Water Pollution Prevention Plan (SWP3) developed for such a facility. The City of Elyria is in violation of Ohio Revised Code 6111.04 and Ohio Administrative Code 3745-39-04 for failure to renew their NPDES permit coverage for the WWPCP. This requires the submittal of an NOI and the $350 renewal fee to renew the NPDES permit. The City has developed a SWP3 for the Plant with annual inspections. *Please see facility inspection worksheet for more information on the facilities SWP3.* A Storm Water Pollution Prevention Plan (SWP3) must be developed and implemented for the following facilities: Central Maintenance Complex 851 Garden St. Elyria, OH 44035 Parks and Recreation Maintenance Garage 120 Floradale Ct. Elyria, OH 44035 Brookdale Cemetery Maintenance Garage 41600 Oberlin Ave. Elyria, OH 44035 The Ohio EPA General Storm Water NPDES Permit for Small MS4s #OHQ000002 requires the City of Elyria to develop and begin implementing the SWP3 for the above facilities within 2 years of permit renewal, i.e., by June 2011. The above facilities must be inspected at least once per year and a record of the inspection and its findings must be kept with the SWP3. If this annual inspection reveals deficiencies in the SWP3 or BMPs that are ineffective, the SWP3 must be revised to correct the problems. The SWP3 should contain a checklist to provide consistency to facility inspections. The SWP3 should also identify who is

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responsible for facility inspections as well as a stormwater contact person for the facility. 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 SWP3s. Also refer to the following website for information on developing SWP3s for these facilities: Developing your SWP3: http://www.epa.gov/npdes/pubs/industrial_swppp_guide.pdf The City indicates that the SWP3 for the Central Maintenance Garage is 90% complete and will be ready by the deadline in the permit. Please be sure that the SWP3 for this facility includes BMPs for material storage, fueling, impound, and vehicle maintenance and washing areas of this facility. The SWP3s for the Brookdale Cemetery and the P&R Maintenance Garage also need to include BMPs for the areas listed above that apply. *The City needs to do an evaluation of where the floor drains in each of these garages leads (Sanitary or Storm).* Please be sure this is included in the facilities SWP3s and that the BMPs are adjusted accordingly. Please be aware that although the Fire Stations do not require SWP3s, they each need to adopt stormwater BMPs when conducting activities that could be detrimental to the City's MS4, such as vehicle washing and maintenance, etc. **At this time it will NOT be necessary for the City to develop a SWP3 for the Water Pumping Station located at 3628 W. Lake Erie Avenue, Lorain.

Pesticides, Herbicides & Fertilizers	
Interview Questions	**Response**
Certified applicators used?	YES Most of this is contracted out to Weed Pro, but their staff does do some themselves. Only the certified applicator applies pesticides that City staff would apply.
Integrated Pest Management (IPM) practices used?	NO Weed Pro may or may not use IPM. The City may want to investigate this further.
Storage location of pesticides, herbicides, and fertilizers:	In garage at Floradale. During facility inspection, could not find the location of these chemicals. City stated that the little that they do apply is usually purchased and then used right away.
BMPs used during application:	The Certified applicator for the City *sweeps up fertilizer when it has been over- applied, protects storm drains from overspray, does not apply when it is about to rain*, etc, but none of this is formalized as far as procedure and policy goes. The City needs to develop some sort of fertilizer/ pesticide application plan that will consider stormwater BMPs such as described above. **Contract with Weed Pro does not include pollution prevention language.

Fertilizer/pesticide application plan utilized?	NO Nothing written at this time.	
Applicable Documents	**Reviewed**	**Obtained**
Fertilizer/pesticide application plan	Does not exist	

Notes

Certified Applicator Requirements

Communities are considered to be commercial pesticide applicators and are subject to the rules and requirements of the Ohio Department of Agriculture. As such, the City must have at least one licensed applicator on staff, and currently does. The licensed applicator may train others on the staff to apply pesticides as long as he conducts certain training and maintains records. However, a licensed applicator can be no more than 2 hours away when pesticides are applied. So, if your community only has one licensed applicator and he's on vacation more than 2 hours away, the community cannot apply pesticides.

BMPs for Pesticide, Herbicide and Fertilizer Application

Pesticides, herbicides and fertilizers should not be applied when the forecast calls for rain. The label of most products will provide guidance on when and how much of these materials should be applied. Do not exceed manufacturers' recommendations. In addition, crews must be trained to avoid overspray and to implement dry clean-up methods should spills occur. Under no circumstance should crews hose spilled materials into storm drains. Storm drains near application areas can be temporarily covered to prevent overspray or spills from entering the MS4. The usage of fertilizers can also be reduced by replacing typical lawn-type grasses with natural, slow-growing grass species that require less or no fertilizers to be sustained. The City of Cleveland is using this method to revegetate neighborhoods where blighted homes have been razed. This will reduce costs to the City to maintain this new greenspace.

Integrated Pest Management (IPM) is an effective and environmentally sensitive approach to pest management that relies on a combination of common-sense practices. IPM programs use current, comprehensive information on the life cycles of pests and their interaction with the environment. This information, in combination with available pest control methods, is used to manage pest damage by the most economical means, and with the least possible hazard to people, property, and the environment. For further information, please refer to http://www.epa.gov/pesticides/factsheets/ipm.htm.

The City does not have a documented pesticide, herbicide and fertilizer application plan. The application records should keep track of the name of the substance being applied and the type of chemical, amount used and time the material is being applied as well as who the applicator was. If a contractor is being used as well, the City needs to include language into the contract that requires the contractor to consider pollution controls where the activities undertaken are a potential source of storm water pollution.

Please provide me with a copy of the City's pesticide, herbicide and fertilizer application plan.

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

Standards, BMPs, & Outreach	
Interview Questions	**Response**
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: Not as part of PIPE and do not provide doggie bags in parks. Signs stating City Ordinance requires that you clean up after your dog were in some parks, but were vandalized. Litter reduction: The City has an anti-litter campaign as part of their PIPE program. City puts things on the radio. Handouts at Apple Festival. Work with Junior High on "don't litter" message. Hand out pens, etc. Other messages include "don't dump into storm sewer", "don't litter", etc. Importance of trees/riparian area.

Applicable Documents	Reviewed	Obtained
BMP manual or guidance document	Does not exist	
Contract language for MS4 operation and maintenance activities	Does not exist	

Notes

Technical Guidance and Specifications for Maintenance Staff

The City needs to develop a program for the dissemination of technical guidance to its maintenance staff on storm water pollution prevention matters. The City should look for posters that can be hung in work areas or lunchrooms, or guidebooks that can be taken out into the field with maintenance crews. This will help reinforce employee training. Once it is prepared, the City will need to train staff on the SWP3 for the Central Maintenance Garage and should look to adopt standards and specifications for storm water pollution prevention implementation in all its municipal operations with the potential to release pollutants in storm water runoff. Existing guidance manuals you may find useful to meet this goal include the ***Rainwater and Land Development*** manual (ODNR, 2006) and the ***Municipal Pollution Prevention/Good Housekeeping Manual #9*** (Center for Watershed Protection, September 2008). This manual is available as a free download on their website at http://www.cwp.org/formmaker/Download-Form_RedirectFormPage.html.

Contracted Staff

Once again, please be sure to include language requiring pollution controls in all contracts and requests for proposal (RFPs) where the activities are a potential source of storm water pollution. The operations of third party service providers should be reviewed periodically by the City to ensure that the required pollution controls are being implemented.

Public Education and Outreach

Please be aware that the performance standards established in NPDES permit #OHQ000002, i.e., the permit in effect for the next 5-year term, requires the City to use more than 1 mechanism and target at least 5 different storm water themes or messages over the permit term. In addition, you must provide

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at least 5 public involvement opportunities over the permit term. Certain activities, such as stream clean-ups or storm drain stenciling projects with local boy scout troops, can count toward both requirements because they involve the public as well as educate them on storm water pollution issues. **NOTE:** The City has a Report-a-polluter hotline. It is advertised on the cities website, in the newspaper, etc. They get about 10-11 calls per year including industrial and construction complaints, that the City immediately follows up on, and addresses the problem.

Staff Education and Training	
Interview Questions	**Response**
Staff trained to identify potential storm water pollution sources which would result in an illicit discharge? Frequency:	YES (But for WWPCP staff only) No training program is in place at this time. The WWPCP does have training with their staff. Aaron and Mukund attend Ohio EPA training sessions. Nothing yet has been established for the maintenance staff and streets department staff. **Once per year, training of at least one department is required.
Materials used to train staff:	The WWPCP were trained via the discussion that went on during the Plants annual comprehensive site evaluation and walk through of the site.

Applicable Documents	Reviewed	Obtained
Training materials	Not provided.	

Notes
MS4 Staff Training Although some training has been offered to WWPCP staff in 2009, the City has not developed the required staff training program expected under the MS4 program. The first generation of the MS4 permit required the City to develop an employee training program to prevent and reduce storm water pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances and storm water system maintenance. The City was not able to document a single training event throughout the first permit term. This does not constitute an acceptable employee training program. *Please note that NPDES permit #OHQ000002 requires the City to conduct at least one employee training event on these topics per year.* If key management staff attends a storm water education event, it is expected that the information learned will be shared with the appropriate staff so that they can conduct their job duties without causing storm water pollution. The City should also look to incorporate training on storm water pollution prevention in any new employee training program that may exist if that employee's job duties have the potential to create storm water pollution or include illicit discharge identification and elimination. For training that the City organizes for its staff, please retain: (1) the agenda for the training session, including the date that training was provided and names/organizations of the speakers, (2) an

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attendance list with the signatures of attendees and (3) one copy of the materials used for training. For outside training attended, include an agenda (if available) or a list of topics, the names of attendees, date attended and a copy of any attendance certificate issued by the training organization. The following materials may help with the training development: 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. The Center for Watershed Protection also has information available for training in their Manual #9: Municipal Pollution Prevention/Good Housekeeping Practices.

FIELD INSPECTION WORKSHEET

MS4 SWMP Evaluation

MS4 Maintenance Facility Field Inspection Worksheet

Permittee: City of Elyria Central Maintenance Complex (CMG)	
Address of facility: 851 Garden St., Elyria 44035	**Size of facility:**
Date of visit: 6/2/2010	**Time of visit:** 1:30 p.m.

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

Name	Title
Mukund Moghe	***City Engineer***
Aaron Klien	***Project Engineer***
Stacy Faile	***AECOM***
Gary Dickerson	***Streets Superintendent***
Jim Hutchings	***Assistant Safety Service Director***
Scott Payne	

Evaluator Observations:	
SWPPP or stormwater plan	
Has the maintenance facility developed a SWPPP or stormwater plan?	**No. Facility needs to develop and implement the equivalent of an industrial SWP3. See interview. City is about 90% through with SWP3 for this facility.**
Does the plan include a site map, list of pollutant sources, BMPs, and maintenance procedures?	**Does not exist.**
Does the permittee conduct and document periodic inspections of the facility?	**No formal inspection for stormwater BMPs. See interview.**
Are storm drains labeled and free of debris?	**NO. Drains have a lot of sediment and oil sheen flowing through the grates. No BMPs have been implemented to stop these pollutants from entering the City's MS4 such as inlet protection.**
Vehicle maintenance, fueling and washing	
Are vehicle maintenance activities conducted in a designated place not exposed to stormwater?	**YES. Vehicles are maintained inside the Complex where drains supposedly lead to a grease trap and then to sanitary. The City needs to evaluate the floor drains with in the Complex to ensure they all lead to sanitary. Those that do not need to be capped or more BMPs need to be carried out in these areas.**
Are fueling stations properly designed with spill kits nearby?	**There is a spill kit next to the fueling station along with a clearly labeled emergency shot off button. The City should consider covering the storm drains near the pump when refilling the fuel storage tank.**
Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer?	**YES. Vehicles are washed inside the complex where the floor drains supposedly lead to a grease**

	trap before going to sanitary. The City needs to verify that drains actually go to sanitary. All vehicles need to be washed inside where there is no discharge to the City's MS4. It was also noted that mowers were being rinsed off outside. This practice needs to be stopped or move to a place where there is no discharge to the MS4
Material storage	
Are all materials that are potential stormwater contaminants stored under cover or in secondary containment?	**NO. Many of the barrels in the building are in secondary containment. The City needs to scrap out any unneeded scrap that is laying out in the service yard. The salt at this sight is swept up fairly well. *A curtain or door would be ideal for the salt dome to keep the weather out.* See Notes**
Hazardous waste management	
Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff?	**Used oil drums need to be *clearly* labeled "Used Oil."**
Waste management	
Are waste bins covered with waste properly disposed in containers?	**All dumpsters need to be equipped with lids and regularly inspected for leaks.**
How is landscape waste stored?	**There is a large stockpile of landscape waste in the front of the Complex yard where residents drop off. They say the pile does not usually accumulate but there was a fair amount decomposing at this time. Madden brothers usually move the pile to their composting yard at the back of the complex. See Notes.**
Spill response	
Does the facility have a spill response plan, and are spill kits readily available?	**There is no spill response plan for this facility. The City will have to develop this in their SWP3 for the facility. There are spill kits located throughout the facility where necessary.**
Employee training	
What type of stormwater training does maintenance staff receive?	**No training has been provided to these staffs.**

Notes or additional information:

<u>Floor Drains</u>

The floor drains throughout the entire Complex need to be evaluated to determine whether they lead to Sanitary or to the City's MS4. It was stated that because the facility was built on a landfill the drains may be connected to leach drains. Later we were told the drains lead to a grease trap and then to sanitary. This evaluation will be essential to developing the facility's SWP3. Because maintenance and car washing is conducted in the building, the City needs to take extra precaution and implement BMPs to avoid discharging pollutants into the drains. Some of the drains showed definite signs of clogging, which also need to be cleared out periodically.

Catch Basins
The flow leading into the storm drains throughout the yard is full of sediment and leachate and there is oil sheen on almost all the water puddles. This shows us there are minimal BMPs being implemented at this site. *The City needs to be implementing BMPs to ensure that pollutants are not being discharged to the MS4.* Inlet protection should be provided for the catch basins most susceptible to sediment runoff. All the stains throughout the yard need to be cleaned up and the City needs to implement some BMPs to prevent future stains from occurring.

Yard Waste
There is a large pile of yard waste at the front of the Complex. This is a drop-off site for citizens but it seems the pile has not been depleted for days. At this time there are no runoff controls in place for the pile and there is leachate discharging from the pile to the City's MS4 on Garden St. The City is not authorized to discharge this leachate into their MS4; therefore, the City needs to implement some sort of runoff control or containment structure to halt the discharge while the pile remains at this location.

Also there is a pile of compost built up by Madden Bros. to form a ramp for loading and unloading their trucks. This is not an acceptable. The pile will discharge leachate which the City cannot allow. If this structure is necessary than the City will need to build the ramp out of some other material such as concrete or asphalt.

Material Storage
The scrap metal dumpster needs to be tarpped and inspected for leaks. Through our inspection it was noted that the dumpster was not leak proof; therefore, no metals with fluids may be placed in this dumpster. Also, the dumpster near the impounded cars is where the City places street sweepings and animal carcass. This dumpster needs to be lidded at all times and inspected regularly for leaks.

The impounded cars stored on the facility's yard need to be inspected *for leaks and drained of all fluids* before placing them outside where they are susceptible to the weather.

The garbage trucks stored outside are leaking which may be contributing to some of the leachate leaching through the yard and to the catch basins. There are also puddles of oil under a lot of the trucks. The City needs to develop a procedure to prevent these leaks and clean up the spills that have already occurred.

Transmission fluid barrels were stored outside without any other containment. Theses need to be stored inside and in secondary containment.

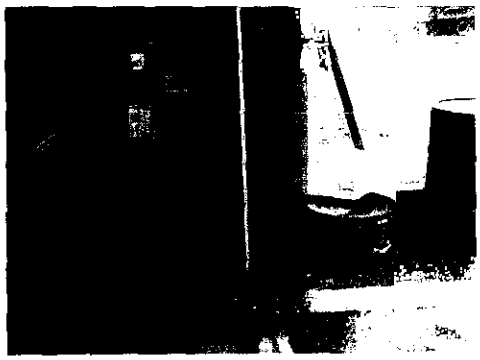
All other excess scrap stored outside should be scraped out if it is no longer needed.

Management
In developing the SWP3 for this facility, the City really needs to develop a web of responsibilities with one person overlooking the whole facility. This person needs to be aware of all operations occurring at this complex and involved in the facilities stormwater program.

INSPECTION PHOTOS
Central Maintenance Complex
City of Elyria

Photos Taken: June 2, 2010

Fig 1: Floor drain inside the complex is clogged up and needs to be cleaned out and water needs to be properly disposed of as wastewater.
Fig 2: All scrap oil needs to be labeled "Used Oil"



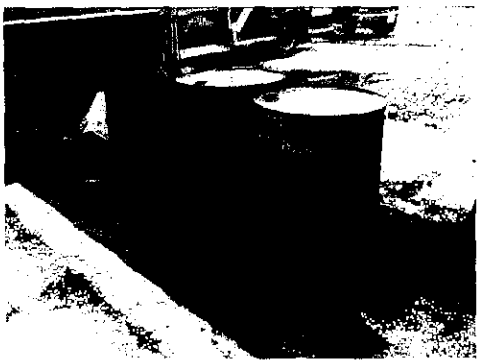


Fig 3: Contaminants stored inside the complex are leaking to the outside where they flow to the catch basins when a rain event occurs. Need to be stored in secondary containment.
Fig 4: The antifreeze barrels are leaking to the City's MS4. They need to be taken inside and stored in secondary containment.

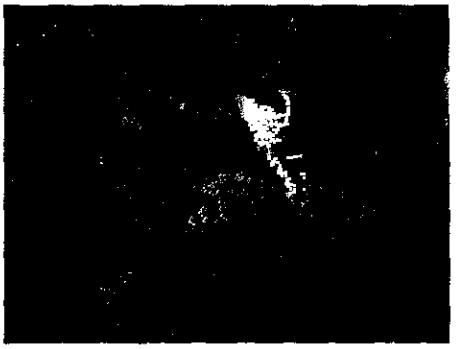


Fig 5 & 6: Looks like a leak from a vehicle that was stored here at one point. This spill needs to be cleaned up and no vehicle with leaks of this severity should be stored outside without controls.

Fig 7 & 8: Runoff is full of sediment, leachate, and oil but there is no inlet protect available and no BMPs being implemented to stop these discharges.

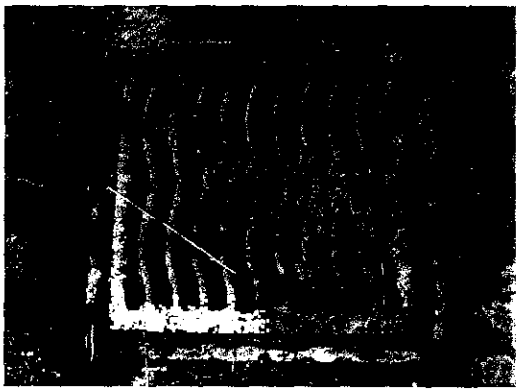


Fig 9: Mower washing needs to be taken inside or to a place where there is no discharge to the MS4. This image shows the grass clippings surrounding the inlet.

Fig 10 & 11: Image of the yard waste drop off site, with leachate draining to the City's MS4 on Garden St behind the pile.

Fig 12: Madden Bros. compost ramp needs to be removed. Leachate is being discharged from this pile.
Fig 13: A puddle out in the maintenance yard full of sediment and oil.

Fig 14: This dumpster is not lidded and shows severe signs of rusting and leaking.
Fig 15: Sanitary dumpster but used for street sweepings and carcasses as well, needs to be lidded and regularly inspected for leaks.

Fig 16 & 17: Impounded cars need to be inspected for leaks and drained of fluids before placed outside. These images show the aftermath of not conducting these BMPs. All the puddles surrounding the cars had visible oil sheer.

Fig 18: This barrel needs to be placed in secondary containment and covered if it is to remain outside.

Fig 19: Leachate and runoff are draining to the back of the facility where the stream flows. The image also shows a leaky dumpster.

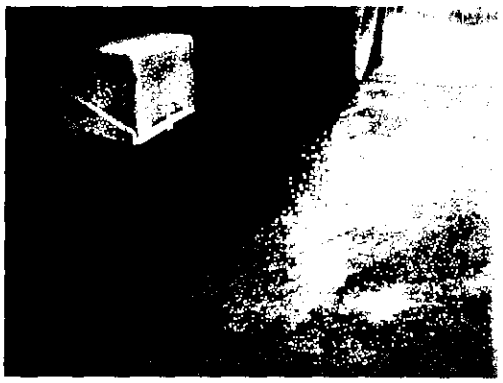


Fig 20: Fluids from the garbage trucks leaking onto the yard for long periods of time.

Fig 21: The plug in the garbage trucks needs to be in at all times.

FIELD INSPECTION WORKSHEET

MS4 SWMP Evaluation

MS4 Maintenance Facility Field Inspection Worksheet

Permittee: City of Elyria Parks and Recreation Maintenance Garage	
Address of facility: 120 Floradale Ct., Elyria 44035	**Size of facility:**
Date of visit: 6/2/2010	**Time of visit:** 4:40 p.m.
Provide the name(s) and title(s) of permittee staff present during inspection	
Name	**Title**
Mukund Moghe	***City Engineer***
Aaron Klien	***Project Engineer***
Evaluator Observations:	
SWPPP or stormwater plan	
Has the maintenance facility developed a SWPPP or stormwater plan?	**No. Facility needs to develop and implement the equivalent of an industrial SWP3. See interview.**
Does the plan include a site map, list of pollutant sources, BMPs, and maintenance procedures?	**Does not exist.**
Does the permittee conduct and document periodic inspections of the facility?	**No formal inspection for stormwater BMPs. See interview.**
Are storm drains labeled and free of debris?	**Yes drains are labeled but there is debris and chip pile leachate flowing into the catch basin. There are no BMPs being implemented at this time to stop this discharge.**
Vehicle maintenance, fueling and washing	
Are vehicle maintenance activities conducted in a designated place not exposed to stormwater?	**A small amount of maintenance is done inside the garage. The city needs to determine where storm drains in the garage flow and include this in the SWP3 for the site including BMPs to limit discharge.**
Are fueling stations properly designed with spill kits nearby?	**N/A no fueling stations at this site.**
Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer?	**No Vehicles are washed on-site.**
Material storage	
Are all materials that are potential stormwater contaminants stored under cover or in secondary containment?	**A lot of the materials stored outside are exposed to the weather and no runoff controls are in place. See Notes.**
Hazardous waste management	
Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff?	**During inspection no used oil was found on-site, but if it exits it needs to be labeled "Used Oil."**
Waste management	
Are waste bins covered with waste properly disposed in containers?	**There is a line of eight dumpsters behind the garage that do not have a lid and some are leaking dumpster juices. All dumpsters need to be lidded**

	and inspected for leaks on a regular basis.
How is landscape waste stored?	
Spill response	
Does the facility have a spill response plan, and are spill kits readily available?	**No spill response plan has been developed for this facility.**
Employee training	
What type of stormwater training do maintenance staffs receive?	**No training provided.**

Notes or additional information:

Floor Drains

The City needs to investigate where the floor drains in this garage lead and include this into the SWP3 for this facility. If they lead to storm, the city should either cap the drains if they are not in use or implement BMPs to prevent pollutant discharge to the City's MS4.

Material Storage

The salt storage shed is three sided and does not have a curtain to cover the forth side. There is salt spilling out of the opening and needs to be pushed back and out of the weather. There was a pile of salt that was pushed over the edge of the yard at the back of the garage. This pile needs to be removed from this location and disposed of in the proper manner.

The landscape mulch stockpiles, chip piles, and other soil piles have no runoff controls in place. At this time, leachate is discharging into the City's MS4 along with sediment from the piles. The City is not authorized to discharge this leachate into their MS4; therefore, the City needs to implement some sort of runoff controls or containment structures to halt the discharge while the piles remain at this location.

Yard waste and grass clippings were found pushed over the edge of the facility at the back of the garage as well, right into the park near the Black River. This practice is unacceptable and City must remove the waste from over the edge and dispose of the material promptly and properly.

NOTE: This facility is not a dump site. Please be sure to scrap out scrap metal and equipment when it can no longer be used.

INSPECTION PHOTOS
Parks and Recreation Maintenance Garage and Yard
City of Elyria

Photos Taken: June 2, 2010

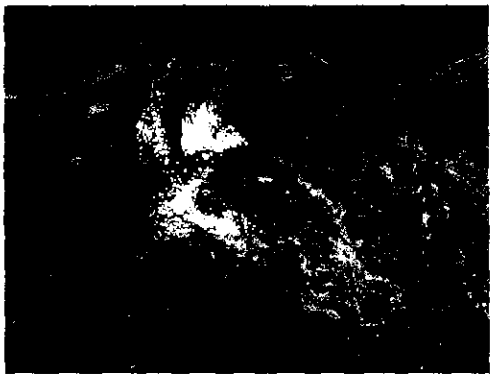


Fig 1: The salt that has spilled through the opening of the shed needs to be push back into the structure and the addition of a curtain to keep the weather out of the shed may be necessary.
Fig 2: The image shows the salt that has been pushed over the edge of the facility. Please remove this pile and dispose of it properly.

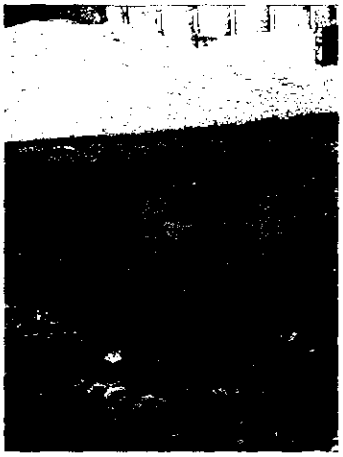


Fig 3: This is the catch basin located in the middle of the piles of landscape mulch and soils. The inlet is clogged full of sediment and his leachate discharging to it.
Fig 4: A puddle of leachate next to the chip and soil piles.

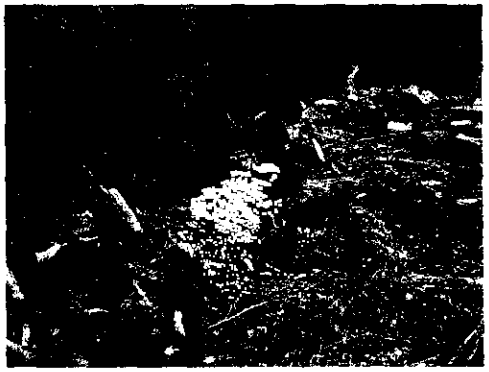


Fig 5: This image shows the yard waste pushed over the edge of the yard into the park below. This material cannot remain at this location. It must be removed and properly disposed of.
Fig 6: Some of the dumpsters along the back of the garage had gaping holes at the bottom causing them to leak dumpster juices.

Fig 7: The dumpsters along the back of the garage all need lids and some need to be inspected for leaks and replaced.
Fig 8: The City needs to investigate where the floor drains in the garage lead.

FIELD INSPECTION WORKSHEET

MS4 SWMP Evaluation

MS4 Maintenance Facility Field Inspection Worksheet

Permittee: City of Elyria WWPCP	
Address of facility: 1194 Gulf Road, Elyria 44035	**Size of facility:** 20 Acre
Date of visit: 6/2/2010	**Time of visit:** 3:30 p.m.
Provide the name(s) and title(s) of permittee staff present during inspection	
Name	**Title**
Mukund Moghe	***City Engineer***
Aaron Klien	***Project Engineer***
Terry Korzan	***WWPCP Superintendent***
Evaluator Observations:	
SWPPP or stormwater plan	
Has the maintenance facility developed a SWPPP or stormwater plan?	**Yes a SWP3 has been developed for this facility. Please see notes about amendments to the SWP3.**
Does the plan include a site map, list of pollutant sources, BMPs, and maintenance procedures?	**The SWP3 included a site map, a list of all potential pollutant sources, the BMPs, and maintenance procedures.**
Does the permittee conduct and document periodic inspections of the facility?	**The permitee conducts annual inspections of the facility using the checklist that was drafted in the SWP3.**
Are storm drains labeled and free of debris?	**No labeling, but the drains are all free of debris.**
Vehicle maintenance, fueling and washing	
Are vehicle maintenance activities conducted in a designated place not exposed to stormwater?	**Vehicles are maintained inside the service building where all floor drains are connected to an oil/water separator and then directed back to the plant.**
Are fueling stations properly designed with spill kits nearby?	**Because the fueling station is open 24/7 to all City staffs, the City needs to make sure the spill kit is also available 24/7. The spill kit needs to be moved outside to the island with the fueling station. The emergency shut off button is also located inside the building. If possible the City should find a way to make this accessible at all times.**
Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer?	**All vehicle washing occurs inside the building where the drains are directed back to the plant.**
Material storage	
Are all materials that are potential stormwater contaminants stored under cover or in secondary containment?	**Not much is stored outside. Please be sure to check all equipment for leaks before storing them outside. All stockpiles seem to be tarped and in good condition.**
Hazardous waste management	
Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff?	**The Used Oil container was labeled correctly.**

Waste management	
Are waste bins covered with waste properly disposed in containers?	**All dumpsters and waste bins need to be *lidded, plugged, and inspected for leaks regularly.* It may be necessary for the City to move some of the dumpsters inside. The catch basin cleanings dumpsters showed some signs of leaking. See Notes.**
How is landscape waste stored?	**N/A. Landscape waste is not stored onsite.**
Spill response	
Does the facility have a spill response plan, and are spill kits readily available?	**Yes the facility has developed a spill response plan for the SWP3 for the WWPCP.**
Employee training	
What type of stormwater training do maintenance staffs receive?	**The last training in 2009 was for employees to walk through the annual inspection with the inspectors as they described what to look for and how to identify stormwater pollutants.**

Notes or additional information:
NOTE: *The City needs to renew their NPDES Permit coverage for industrial activity for the WWPCP. This requires the submittal of an NOI and a $350 renewal fee.*

Catch Basin Cleanings Disposal
There are two dewatering pits for CB debris. Both drains are directed back to the plant for treatment. Once solids are dewatered they are transferred to two dumpsters adjacent to one of the pits. Both dumpsters are tarped, but the tarps are ripped which allows stormwater to re-infiltrate the spoils, which defeats the purpose of the system. ***Please be sure to keep the tarps in good condition, keep the drain plugs in the dumpsters PLUGGED, and inspect these dumpsters for leaks on a regular basis. The City may want to add this practice to their SWP3 as a BMP.***

Street Sweepings Disposal
The spoils are stored outside in a stockpile and then eventually moved to open dumpsters to be taken to the landfill. Normally this would be a problem, but the area is within the containment levee around the plant. The valve that opens the gate must be opened manually. The city needs to make sure a review is done of all runoff from the site before ever opening the valve. This procedure should be included in the facility's SWP3.

Westside Headworks Building
The building has an issue with the bar screen clogging which causes an overflow. They will be installing a sensor to automatically open the by-pass overflow gate to contain spills from this pollutant source. The building has a spill kit and all the dumpster drains and trench drains are directed back to the plant.

Bulk Loading Area
It may be beneficial for the facility staffs to *clean out the cement curb under the connection point to provide containment during the loading process*. A spill kit is located inside the building and staff must stay at the station while pumping. Also, a good BMP would be to start covering the storm drain during loading periods.

Sludge Disposal Building
The City should remove the hose from the area to stop the temptation to hose the area to the trench drains.

SWP3 Review

In general, the SWP3 for this facility is in compliance with EPA regulations. There are a few minor changes that will help improve the SWP3 overall and therefore improve the stormwater program. It is suggested that the City use the industrial stormwater fact sheet for treatment works as a basis to improve their SWP3 (see attachment) or http://www.epa.gov/npdes/pubs/sector_t_treatmentworks.pdf.

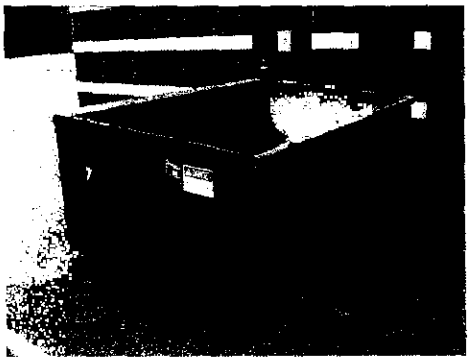
The City can also refer to the following website for help on developing a SWP3:
Developing your SWP3: A Guide for Industrial Operations:
http://www.epa.gov/npdes/pubs/industrial_swppp_guide.pdf

A few comments on The City of Elyria WWPCP's SWP3:

- Remember the SWP3 is a "living document," details in the SWP3 implemented by the facility need to be updated as necessary. For example, keep the SWP3 updated with changes that have been noted in inspections. Also, the East side interceptor influent chamber is listed as a potential pollutant on the inspection checklist but not in the SWP3. Please update one or the other accordingly.
- More specific details on implemented BMPs should be listed. Use the attachment to run through some standard BMPs. For example, we would like to see BMPs written in a more site-specific manner. BMPs listed for the different potential pollution sources need to be stated as such.
- The site map could be clearer. Colors would help distinguish between the different lines and parts of the map making it a more functional document.
- There needs to be more detail on spill prevention. The City should include the location of all spill kits on their site map or create a new site map specifically for spill prevention.
- Street sweepings need to be added to the SWP3 as a potential pollutant source area that needs to be monitored to make sure runoff stays contained in the plants "levee" system.
- Record keeping for training needs to improve. The city needs to establish some form of documenting training events and include this in the SWP3.
- The facility also needs to report on the effectiveness of the implemented BMPs. These records need to be included as part of the SWP3.
- Make sure the facility supplies filled out forms of the forms they have attached to the back of the SWP3.

INSPECTION PHOTOS
WWPCP
City of Elyria

Photos Taken: June 2, 2010



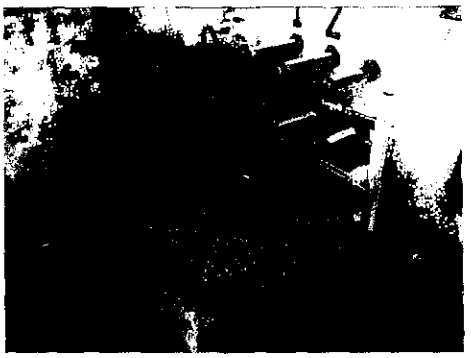


Fig 1: Dumpster for rags needs to be lidded, plugged, and inspected for leaks or placed inside.
Fig 2: The inside of the cement curb under the connection points should be cleaned out to provide containment.

Fig 3&4: The two dewatering pits for catch basin cleanings.

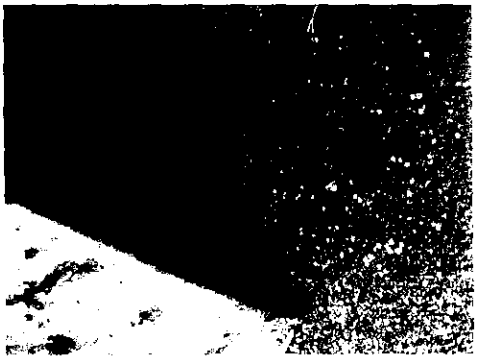


Fig 5: One of the dumpsters next to the catch basin dewatering pit for dry CB spoils.
Fig 6: Both dumpsters are showing signs of leakage. The dumpsters need to be ***plugged*** and covered at all times.

Fig 7: One of the tarps covering the CB spoils dumpster has a few holes in it. This tarp needs to be replaced to keep stormwater from re-infiltrating the spoils.