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TRUMBULL CORTLAND

TRUMBULL COUNTY  
COMMISSIONERS & OTHERS

3GQ00002 2010/04/07

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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

April 7, 2010

RE: TRUMBULL COUNTY  
MCDONALD, VILLAGE OF  
MS4 INSPECTION FINDINGS  
MCM #6 – POLLUTION PREVENTION  
FOR MUNICIPAL OPERATIONS

Mr. Thomas Domitrovich  
City Administrator  
Village of McDonald  
451 Ohio Avenue  
McDonald, Ohio 44437

Dear Mr. Domitrovich:

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, but did also touch upon other requirements of the municipal storm water program. 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) 3GQ00002\*BG and Ohio Administrative Code 3745-39.

On March 16, 2010, Ohio EPA met with representatives of the Village of McDonald and Trumbull Soil and Water to conduct the audit. Compliance was determined based on the requirements of the NPDES permit and the measureable goals established in 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 Worksheets 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 implement salt minimization procedures and training on salt application practices as specified in the SWMP.** This is a violation of Part III.6.d.iii.2 of the NPDES permit and ORC 6111.04 and 6111.07. The SWMP specifies that the Village of McDonald will develop salt minimization procedures and training on salt application practices. Please implement a program in accordance with the SWMP;

- **Failure to develop an operations and maintenance program for the MS4 that includes 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. The SWMP requires one supervisor to be sent to, at a minimum, one pollution prevention workshop annually. In addition, all employees are to receive, at a minimum, one training session annually. While the Village of McDonald stated verbal training of employees occurs, no records are being maintained to document that the required training is occurring. Please 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](http://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](http://www.epa.gov/npdes/training). Be sure to include storm water pollution prevention training in any new employee training program, where appropriate. Adequate records must be maintained to document that the required training is occurring; and
  
- **Failure to comply with provisions of the Ohio EPA General Storm Water NPDES Permit for Construction Activities for municipal construction projects.** This is a violation of Ohio Revised Code 6111.04 and 6111.07. This violation pertains to two issues:
  - ***Failure to implement post-construction best management practices on all municipal construction projects where 1 or more acre of land is disturbed.*** This is a violation of Part III.G.2.e of NPDES permit #OHC000002 and OHC000003. In a review of the Village of McDonald 6th St project, Trumbull SWCD had no records of post-construction water quality BMPs being designed or installed to treat runoff from the improvement area. Please provide me with a plan to correct this violation. Ohio EPA is open to off-site mitigation if it is more practical at this stage of the project; and
  
  - ***Failure to submit a Notice of Termination (NOT) 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 Village of McDonald has 2 active projects permitted under the Ohio EPA General Storm Water NPDES Permit for Construction Activities but indicated during the interview the projects were complete. Please submit an NOT for all projects that are complete or no longer viable.

### Deficiencies

- A storm water pollution prevention plan (SWP3) has not yet been developed for the Street and Water Department maintenance garages. Per Part III.B.6.c of the NPDES permit, an SWP3 must be developed and implemented by June 24, 2011;

Mr. Thomas Domitrovich  
Village of McDonald  
April 7, 2010  
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- While the Village of McDonald has passed a comprehensive storm water management ordinance, No. 3069-10, a comprehensive long-term maintenance program must be developed and implemented that ensures the long-term maintenance of storm water management facilities;
- The Village of McDonald 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 this amount, if not already doing so, as it is required to be reported on the new Annual Report form; and
- The Village of McDonald must develop a list of Municipal Facilities with Potential to Discharge Storm Water Pollutants.

Please review my comments and provide me with a letter of response indicating the actions you will take to address the violations and deficiencies noted above. **Your response should be received no later than May 7, 2010.** Should you have any questions, please contact me at (330) 963-1118 or via e-mail at [chris.moody@epa.state.oh.us](mailto:chris.moody@epa.state.oh.us).

Sincerely,



Chris Moody  
Environmental Specialist  
Division of Surface Water

CM/mt

cc: Jason Fyffe, Ohio EPA, DSW, CO  
Jason Trapp, Trumbull SWCD  
Amy Reeher, Trumbull SWCD

# FIELD INSPECTION WORKSHEET

## MS4 SWMP Evaluation

### MS4 Maintenance Facility Field Inspection Worksheet

<b>Permittee:</b> McDonald, Village of	<b>Permit No:</b> 3GQ00002*BG
<b>Address of facility:</b> 250 Second Street	<b>Name of facility:</b> Street and Water Department Vehicle Maintenance Garages
<b>Date of visit:</b> March 16, 2010	<b>Time of visit:</b> 1:00 PM
<b>Provide the name(s) and title(s) of permittee staff present during inspection</b>	
<b>Name</b>	<b>Title</b>
Thomas Domitrovich	Administrator
Jason Trapp	Storm Water Specialist
Amy Reeher	Watershed Coordinator
<b>Evaluator Observations:</b>	
<b>SWPPP or stormwater plan</b>	
Has the maintenance facility developed a SWPPP or stormwater plan?	No. The Street and Water Department Vehicle Maintenance Garage has not developed a SWP3.
Does the plan include a site map, list of pollutant sources, BMPs, and maintenance procedures?	Not applicable as a SWP3 has not been developed. These are required components of the SWP3. Please be sure to include this information in the SWP3.
Does the permittee conduct and document periodic inspections of the facility?	Daily inspections are conducted, but are not documented. A comprehensive site evaluation must be performed annually and periodic routine inspections must occur per the schedule in the SWP3. Ohio EPA recommends that periodic routine inspections occur once per month. All inspections must be documented. The SWP3 should provide a blank to use during inspections.
<b>Vehicle maintenance, fueling and washing</b>	
Are vehicle maintenance activities conducted in a designated place not exposed to stormwater?	Yes. Vehicle maintenance activities occur under roof; however, the floor drains discharge to a culverted stream that flows through the property (Figures 1 to 2). The discharges from the floor drains are considered an illicit discharge. Any floor drain that has been installed must addressed via one of the below alternatives:  <ol style="list-style-type: none"> <li>1. Removal by filling with concrete; or</li> <li>2. Applying for a NPDES permit authorizing a discharge from the Street and Water Department Vehicle Maintenance Garage and submit a Permit-to-Install (PTI) for the treatment system that will be utilized to remove pollutants from the discharge; or</li> <li>3. Connecting the floor drains to an existing sanitary</li> </ol>

	<p>sewer line for treatment.</p> <p>The Village of McDonald must provide information to Ohio EPA establishing how the floor drains will be addressed. The information submitted must also include a schedule on when the selected corrective action will be implemented.</p> <p>For your convenience, Ohio EPA's NPDES permit and PTI application forms can be obtained at the following Web pages:</p> <p>Ohio EPA NPDES permit applications  <a href="http://www.epa.ohio.gov/dsw/permits/npdesform.aspx">http://www.epa.ohio.gov/dsw/permits/npdesform.aspx</a></p> <p>Ohio EPA PTI applications  <a href="http://www.epa.ohio.gov/dsw/pti/PTIForms.aspx">http://www.epa.ohio.gov/dsw/pti/PTIForms.aspx</a></p>
<p>Are fueling stations properly designed with spill kits nearby?</p>	<p>No. A spill kit must be placed at the fueling station.</p>
<p>Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer?</p>	<p>Yes. Vehicles are washed outdoors on a wash pad that has been connected to the Village of McDonald's sanitary sewer system.</p>
<p><b>Material storage</b></p>	
<p>Are all materials that are potential stormwater contaminants stored under cover or in secondary containment?</p>	<p>Partially. 55-gallon drums, 5 gallon pails, and gasoline containers are stored indoors, but require secondary containment (Figures 2 to 4).</p> <p>Salt storage occurs within a covered building that is owned by the Village of McDonald on land that is owned by a private entity.</p>
<p><b>Hazardous waste management</b></p>	
<p>Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff?</p>	<p>No. 55-gallon drums and gasoline containers are stored indoors, but require secondary containment (Figures 2 to 4).</p>
<p><b>Waste management</b></p>	
<p>Are waste bins covered with waste properly disposed in containers?</p>	<p>Partially. Waste bins are covered with waste properly disposed in containers. Liquids which are decanted from catch basin cleanings and street sweepings as well as storm water which contacts these spoil materials is leachate, a wastewater, and must be managed appropriately.</p> <p>Waste materials exposed from the melting snow stockpile associated with the winter snow removal operation must be collected and properly disposed of</p>

	(Figure 5). Wood is stored outdoors.
How is landscape waste stored?	The Village of McDonald performs leaf collection and temporarily stores the leaves on Woodland Park property owned by the Village of McDonald, if needed (Figure 6). BMPs (i.e. installation of berms, diversion ditches, vac-truck collection, etc.) must be incorporated that address the temporary storage area to prevent offsite discharges of leafate.
<b>Spill response</b>	
Does the facility have a spill response plan, and are spill kits readily available?	Spill kits are available where vehicle maintenance activities occur; however, a spill response plan must be developed as part of the SWP3.
<b>Employee training</b>	
What type of stormwater training do maintenance staff receive?	The Village of McDonald stated that verbal training occurs.
<p><b>INSPECTION PHOTOS</b></p> <p><b>Street and Water Department Vehicle Maintenance Garages</b></p> <p><b>Photos Taken:</b> March 16, 2010  <b>By:</b> Chris Moody, Ohio EPA, DSW-NEDO</p>	



**Figure 1** - Vehicle maintenance activities occur under roof; however the floor drains discharge to a culverted stream that flows through the property.



**Figure 2** - Vehicle maintenance activities occur under roof; however the floor drains discharge to a culverted stream that flows through the property.



**Figure 3** - The 55-gallon drum storage area requires secondary containment.



**Figure 4** - The 5 gallon pail storage area requires secondary containment.



**Figure 5** - Waste materials exposed from the melting snow stockpile associated with the winter snow removal operation must be collected and properly disposed of.



**Figure 6** - BMPs (i.e. installation of berms, diversion ditches, vac-truck collection, etc.) must be incorporated at the Woodland Park temporary leaf storage area to prevent offsite discharges of leafate.

# Municipal Storm Water Program Evaluation

## MS4 Maintenance Component Worksheet

<b>Date of Evaluation</b>
March 16, 2010
<b>Evaluator Name, Title</b>
Chris Moody, Environmental Specialist II
<b>MS4 Permittee</b>
McDonald, Village of

**Instructions:** Use this worksheet as a guide for questioning municipal separate storm sewer system (MS4) staff and reviewing applicable documents. Keep in mind that additional questions may be necessary based on local regulations, MS4 permit requirements, implementation strategies, or water quality issues. Remember to obtain copies of any applicable documents or files which may assist in writing the MS4 evaluation report.

<b>Staff Interviewed</b>		
<b>Name</b>	<b>Department/Agency</b>	<b>Phone Number/Email</b>
Thomas Domitrovich, Administrator	Village of McDonald	(330) 530-5472
Jason Trapp, Storm Water Specialist	Trumbull County Soil and Water Conservation District (Trumbull SWCD)	(330) 637-2056 x 109 trappj@embarqmail.com
Amy Reeher, Watershed Coordinator	Trumbull SWCD	(330) 637-2056 x 111

<b>MS4 Mapping</b>	
<b>Interview Questions</b>	<b>Response</b>
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)?	<p>The MS4 mapping is utilized to assist in performing dry weather monitoring. The Village of McDonald currently has thirteen outfalls located in its MS4.</p> <p>Ohio EPA recommends that the MS4 map be utilized for additional activities that may include, but not be limited to:</p> <ul style="list-style-type: none"> <li>• Providing storm water management information to the public;</li> <li>• Assisting in the identification and elimination of illicit discharges to the MS4;</li> <li>• Responding to blockages and other drainage issues during precipitation</li> </ul>

<b>MS4 Mapping</b>			
<b>Interview Questions</b>		<b>Response</b>	
		events; <ul style="list-style-type: none"> <li>• Planning future drainage improvement and/or maintenance projects; and</li> <li>• Establishing MS4 and post-construction storm water management best management practices (BMP) inspection schedules.</li> </ul>	
<b>Applicable Documents</b>		<b>Reviewed</b>	<b>Obtained</b>
Map(s) of MS4 system		Yes	No

<b>Notes</b>
<p><b><u>MS4 Mapping</u></b></p> <p>GPD Group, contractor for the Village of McDonald, will begin improving upon the existing map of the MS4 to include elevations, etc. The revised map of the MS4 is expected to be completed by May 31, 2010. The revised map of the MS4 must include post-construction water quality BMPs and private post-construction water quality BMPs which have been installed to satisfy Ohio EPA's NPDES Construction Storm Water General Permit and/or the Village of McDonald's post-construction water quality BMP requirements.</p>

<b>Catch Basin Cleaning</b>			
<b>Interview Question</b>		<b>Response</b>	
Schedule established for inspections and cleaning?		YES	
Is cleaning and maintenance of catch basins tracked:		YES	
How are spoils materials disposed of?		See notes, detailed below.	
Are storm drain pipes inspected?		YES	
Proactive or only in response to blockage event?		See notes, detailed below.	
<b>Applicable Documents</b>		<b>Reviewed</b>	<b>Obtained</b>
List of active municipal construction projects		Yes	No
List of municipal projects covered under the Ohio EPA general storm water NPDES permit for construction activities		Yes	No

<b>Notes</b>
<p><b><u>Catch Basin Identification</u></b></p> <p>The Village of McDonald is maintaining catch basin cleaning records that consist of the number of catch basins cleaned. Ohio EPA recommends that the Village of McDonald develop a numerical system to specifically identify each individual catch basin, which will greatly assist in maintenance activities and detecting and eliminating illicit discharges to the MS4.</p>

**Catch Basin Cleanings Disposal Management**

Prior to 2008, the Village of McDonald utilized a dumping ground for the disposal of street sweepings, vac-truck cleanings, wood chips, and collected leaves. In 2008, the Village of McDonald contracted with Republic Services, Inc. and remediated the former dump by disposing of the waste materials at a licensed municipal solid waste (MSW) landfill.

Currently, spoil materials (i.e. street sweepings and vac-truck cleanings) are stored within a covered roll-off container that is hauled to a MSW landfill for disposal. Liquids which are decanted from catch basin cleanings and street sweepings as well as storm water which contacts these spoil materials is leachate, a wastewater, and must be managed appropriately. Ohio EPA's NPDES MS4 Storm Water General Permit does not authorize the discharge of wastewater to the Village of McDonald's MS4.

The Village of McDonald 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 this amount, if not already doing so, as it is required to be reported on the new Annual Report form.

**Inspection of Storm Sewers**

The Village of McDonald performs proactive inspections of storm sewers on an annual basis; however, no records are being maintained to verify that the inspections are occurring. The Village of McDonald must begin maintaining records documenting when MS4 inspections and maintenance activities occur.

**Municipal Construction Projects**

Trumbull SWCD performs construction site inspections on behalf of the Village of McDonald on a monthly basis in accordance with a memorandum of understanding. Trumbull SWCD provided that the following active NPDES permit for municipal construction projects is located in the Village of McDonald:

NPDES Permit #	Project	Status
3GC04507*AG	Woodland Park	Complete

According to the July 30, 2009 "Inspection and Maintenance Agreement for Storm Water Best Management Practices," a detention pond, two bio-retention cells, and a grass swale with subsurface under drain were installed to satisfy the post-construction storm water management requirements of Ohio EPA's NPDES Construction Storm Water General Permit.

Ohio EPA records indicate that a second active NPDES permits for municipal construction project is located in the Village of McDonald:

NPDES Permit #	Project	Status
3GC00843*AG	Vlg of McDonald 6th St	Complete

The post-construction BMPs that were installed on the Vlg of McDonald 6th St municipal construction project were unknown. This municipal construction project is subject to the post-construction storm water management requirements of Ohio EPA's NPDES Construction Storm Water General Permit, No. OHC000002. The Village of McDonald must provide a detailed description of the post-construction BMPs installed on the Vlg of McDonald 6th St municipal construction project.

If construction is complete on the above two municipal construction projects, Notices of Termination (NOTs) must be submitted to terminate Ohio EPA's NPDES Construction Storm Water General Permit coverage. Please be aware that coverage under Ohio EPA's NPDES Construction Storm Water General Permit is to be terminated within 45 days of when the project reaches final stabilization. The NOT instructions and application can be located at the following webpage:

<http://www.epa.ohio.gov/dsw/swm/stormform.aspx>

<b>Stormwater Management Facilities Operation and Maintenance</b>		
<b>Interview Questions</b>	<b>Response</b>	
Public facilities inspected?  Frequency:	YES  Public storm water management facilities are inspected on a monthly basis as part of the maintenance agreement.	
Private facilities inspected?  Frequency:	Not Applicable  Currently, no private storm water management facilities have been constructed within the Village of McDonald since April 21, 2003.	
Checklist used for inspections?	NO  Trumbull SWCD stated that the maintenance agreement is utilized to conduct storm water management facility inspections.	
Have maintenance standards and procedures been established for these facilities?	Partially  Maintenance standards have been established for the public storm water management facility.	
How is maintenance prioritized? Is data evaluated to target maintenance resources?	NO  Maintenance is not prioritized and data is not evaluated to target maintenance resources.	
	<b>Applicable Documents</b>	<b>Reviewed</b> <b>Obtained</b>
Inspection checklist		No            No

**Notes**

**Inspections of Storm Water Management Facilities**

Currently, only the storm water management facilities installed at Woodland Park have been constructed in the Village of McDonald since April 21, 2003. Please be aware that the Village of McDonald is required to ensure long-term maintenance of storm water management facilities. Ohio EPA requires that this program include privately-owned storm water management facilities constructed since April 21, 2003 and all publicly-owned storm water management facilities. Storm water management facilities include BMPs designed to treat the Water Quality Volume (WQv) or 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:

- 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. Please note that most communities reference standards contained in *Rainwater Land Development* (Ohio Department of Natural Resources, 2006) or the United States Environmental Protection Agency's Menu of BMPs;
- Tracking the location of post-construction BMPs and the party responsible for implementing the long-term maintenance plan;
- Performing an inspection to assure that post-construction BMPs are installed per the approved plan;
- Periodically inspecting or otherwise verifying that the post-construction BMPs are being maintained in accordance with the long-term maintenance plan; and
- Taking enforcement action against the responsible party if they fail to maintain the BMP as required.

The Village of McDonald must develop a comprehensive long-term maintenance program for post-construction BMPs established under Part III.B.5 of Ohio EPA's NPDES MS4 Storm Water General Permit, #OHQ000002.

**Good Housekeeping Manual**

The Village of McDonald stated that it expects to complete a good housekeeping manual by November 31, 2010. Please be aware that good housekeeping manual appears to address the comprehensive maintenance standard and procedure document detailed in the "Stormwater Management Facilities Operation and Maintenance" component of this worksheet.

**BMP Inspection Checklists**

The Village of McDonald should develop a post-construction storm water management facility checklist for conducting inspections to verify that the post-construction BMPs are being maintained in accordance with the long-term maintenance plan.

<b>Road Maintenance</b>	
<b>Interview Questions</b>	<b>Response</b>
Streets regularly swept?	YES
Frequency:	Streets are swept on an annual basis.
Frequency based on water quality factors (e.g. proximity to streams)?	NO
How are spoils disposed of?	Please refer to previous comments located in the "Catch Basin Cleaning" component of this worksheet.
Does the community collect road kill?	YES
What do they do with the carcasses?	Road kill carcasses are stored within a covered roll-off container that is hauled to a licensed MSW landfill for disposal.

Road Maintenance			
Interview Questions	Response		
Does the community have a leaf collection program?	YES		
What do they do with the collected leaves?	Leaf collection occurs within the incorporated limits of the Village of McDonald to prevent leaves from entering the MS4. The collected leaves are occasionally temporarily stored on Woodland Park property owned by the Village of McDonald, if needed. The leaves are transported to a local landscaper for use in the manufacture of a topsoil product.		
BMPs used during road maintenance activities?	YES		
Describe types of road maintenance conducted by community staff and the BMPs used	The Village of McDonald performs painting of curbs, edge lines, and school crossings and pothole patching with cold patch. Resurfacing projects are performed by a contractor with bid specifications that require the contractor to dispose of the grindings.		
BMP guidance available to field staff?	NO		
	The Village of McDonald only provides verbal BMP guidance. Ohio EPA recommends that BMP guidance documents (i.e. flip charts, guide books, etc.) and/or training be developed and available to field staff.		
Deicers used by MS4?	YES		
Type and amount of deicer and additives tracked?	YES		
What measures are being taken to minimize the application of deicers?	The Village of McDonald plows snow first and deices intersections. A 325 ton limit was established by the salt provider and approximately 300 tons were used in 2009. The Village of McDonald performs sidewalk sweeping to remove slag from sidewalks.		
Sand/salt swept up after application?	YES		
How soon?	Municipal street sweeping occurs once temperatures warm to approximately 40° to 50°.		
Applicable Documents		Reviewed	Obtained
BMP guidance		No	No
Street sweeping records		No	No
Deicer application records		No	No

Notes
<p><b><u>Street Sweeping Program</u></b></p> <p>Street sweeping is performed annually, but the frequency can be increased due to seasonal factors or due to a needs. Street sweeping is performed to prevent impacts to the MS4. The Village of McDonald</p>

Notes
<p>typically performs street sweeping in the spring once temperatures warm to approximately 40° to 50° in order to collect the #10 slag that was utilized during the winter season on roadways as a traction control.</p> <p><b><u>Deicer Application</u></b></p> <p>The Village of McDonald utilizes a 1:2 ratio of road salt (NaCl) and slag for deicing purposes. A deicer application policy must be developed by the Village of McDonald that includes the following:</p> <ul style="list-style-type: none"> <li>• A description of the materials used for roadway;</li> <li>• Municipal parking lot winterization (use of salt, sand, bottom ash, etc. or combination thereof), associated application rates;</li> <li>• The rationale for the selected application rates; and</li> <li>• Controls or practices to be used for reducing or eliminating discharges of pollutants resulting from roadway and municipal parking lot winterization activities.</li> </ul> <p><b><u>Leaf Collection Area</u></b></p> <p>The Village of McDonald must incorporate BMPs (i.e. installation of berms, diversion ditches, vac-truck collection, etc.) to address the temporary storage area in order to prevent offsite discharges of leafate. Please be aware that Ohio EPA's NPDES MS4 Storm Water General Permit does not authorize the discharge of leafate.</p>

Flood Management			
Interview Questions		Response	
Inventory of flood management structures completed?		YES	
Structures been assessed for stormwater retrofit?		NO	
New structures include water quality considerations?		YES	
Applicable Documents		Reviewed	Obtained
Inventory		No	Yes

Notes
<p><b><u>Storm Water Retrofit</u></b></p> <p>Part III.B.6.c of Ohio EPA's NPDES MS4 Storm Water General Permit requires the Village of McDonald to establish procedures to ensure that new flood management projects are assessed for impacts on water quality and existing projects are assessed for incorporation of additional water quality protection devices or practices. The Village of McDonald must develop and implement procedures to satisfy Part III.B.6.c of Ohio EPA's NPDES MS4 Storm Water General Permit.</p>

Facilities Operation & Maintenance			
Interview Questions		Response	
Inventory of MS4 facilities complete (i.e. facilities owned and operated by the MS4)?		NO	
<ul style="list-style-type: none"> <li>• Leaf Collection Yards</li> </ul>		<u>Operate?</u> YES	<u>SWP3 Developed?</u> NO

<b>Facilities Operation &amp; Maintenance</b>	
<b>Interview Questions</b>	<b>Response</b>
<ul style="list-style-type: none"> <li>• Maintenance Yards</li> <li>• Parks (Woodland Park)</li> <li>• Parking Lots (Ohio Avenue, Woodland Park Retirement Home, Woodland Park Basketball Court, Woodland Drive, Freed Drive, Woodland Park Baseball, Street and Water Department)</li> <li>• Vehicle Maintenance Garages (Fire Department, Police Department, and Street and Water Department)</li> </ul>	<p>YES NO</p> <p>YES NO</p> <p>YES NO</p> <p>YES NO</p>
Facilities inspected?	YES
	<p>The Village of McDonald stated that daily inspections of MS4 facilities occur; however, no inspection records are being maintained to document that MS4 facility inspections are occurring and the inspection findings.</p> <p>The Village of McDonald explained that the daily inspections are based upon the current insurance agreement and includes requirements that address fuel storage, paint storage, spill kits/clean-up materials, nozzles for the diesel storage tank, and ensuring that the tank containment basin is clean.</p>
Checklist used?	NO
	Checklists should be developed to guide inspections of all facilities with a potential for storm water pollutant runoff. A checklist will help assure that each facility is inspected thoroughly and that there is consistency between inspectors.
Staff which perform the inspections (department or agency):	Sean Stevens, General Operations Foreman, performs the inspections at all MS4 facilities.
Is there a designated stormwater contact person for each facility?	YES
	<p>Thomas Domitrovich, Administrator, is the designated storm water contact for each MS4 facility.</p> <p>Please be aware that MS4 facilities (i.e. Street and Water Department maintenance garages) requiring an storm water pollution prevention plan (SWP3) are required to have a pollution prevention team with specific responsibilities regarding the implementation of the SWP3.</p>

Facilities Operation & Maintenance		
Interview Questions	Response	
	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 Trumbull County Storm Water Management Program (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?:	<p>The Village of McDonald currently does not have any enforcement procedures used to address noncompliance on a MS4-owner facility.</p> <p>The Village of McDonald must follow the employee disciplinary procedure document; however, it stated that failures to implement a SWP3 can be included into the employee disciplinary procedure document. Enforcement procedures must be developed and implemented by the Village of McDonald to address noncompliance at MS4 facilities.</p>	
Parking lots owned/operated by the permittee swept?	YES	
Frequency?	Parking lots owned/operated by the Village of McDonald are swept, at a minimum, annually. The Freed Rive and Woodland Park parking lots are swept more than an annual frequency.	
Do you have any combined sewer systems?	NO	
If yes, do you have any combined sewer overflows?	Not Applicable	
Are you aware of any illicit cross connections between your sanitary sewer and MS4?	<p>NO</p> <p>The Village of McDonald performed smoke testing in 1995/1996 on its sanitary sewer system and approximately 1/3 of the Village of McDonald has foot drain connections that are connected to the sanitary sewer system.</p>	
Have you investigated the extent of infiltration and inflow into storm sewer system?	NO	
What are your plans to repair and eliminate this source of illicit discharge?	The Village of McDonald stated that the Illicit Discharge Detection and Elimination ordinance, 3070-10, was adopted February 17, 2010.	
Sewer spill and cleanup procedures in place?	NO	
	<b>Applicable Documents</b>	<b>Reviewed</b>
Facility inventory		Yes
Facility SWPPP		No
		<b>Obtained</b>
		Yes
		No

**Notes**

**Facility Inventory**

An inventory of MS4 owned or operated facilities that were insured for 2008/2009 was provided. Part III.B.6.d.i. of Ohio EPA's NPDES MS4 Storm Water General Permit requires the Village of McDonald to specifically list the municipal operations that are impacted by this operation and maintenance program. Many of the MS4 owned or operated facilities detailed on the insurance inventory are not impacted by minimum control measure (MCM) No. 6. The Village of McDonald must develop a list of municipal operations that are impacted by MCM No.6.

**Facility SWP3**

A SWP3 must be developed for the Water and Street Department garage. Part III.B.6.c of Ohio EPA's NPDES MS4 Storm Water General Permit requires the Village of McDonald to develop and implement storm water pollution prevention plans, in accordance with the SWP3 requirements (i.e. Part IV) of Ohio EPA's Industrial Storm Water General Permit, OHR000004, for municipal facilities that include vehicle maintenance facilities, bus terminals, composting facilities, impoundment lots and waste transfer stations. For your convenience, Ohio EPA's Industrial Storm Water General Permit can be located at the following webpage:

[http://www.epa.ohio.gov/dsw/permits/GP\\_IndustrialStormWater.aspx](http://www.epa.ohio.gov/dsw/permits/GP_IndustrialStormWater.aspx)

The Village of McDonald must develop and implement a SWP3 for the above named applicable municipal facility.

**Pesticides, Herbicides & Fertilizers**

Interview Questions	Response
Certified applicators used?	YES  The Village of McDonald utilizes contractors twice a year that have been certified to apply pesticides, herbicides and fertilizers.
Integrated Pest Management (IPM) practices used?	NO
Storage location of pesticides, herbicides, and fertilizers:	The Village of McDonald stores commercial herbicide (i.e. "Round Up") at the Street Department garage.
BMPs used during application:	The Village of McDonald utilizes commercial herbicide (i.e. "Round Up") in accordance with the manufacturer specifications.
Fertilizer/pesticide application plan utilized?	NO  The Village of McDonald has not developed a fertilizer/pesticide application plan, but stated that it will be addressed via the good housekeeping manual that is to be developed by November 31, 2010.
<b>Applicable Documents</b>	<b>Reviewed</b> <b>Obtained</b>
Fertilizer/pesticide application plan	No                  No

**Notes**

**Certified Applicator Requirements**

Communities are considered to be commercial pesticide/herbicide applicators and are subject to the rules and requirements of the Ohio Department of Agriculture. As such, the Village of McDonald must have at least one licensed applicator on staff. The licensed applicator may train others on the staff to apply pesticides/herbicides as long as he/she conducts certain training and maintains records. However, a licensed applicator can be no more than two hours away when pesticides/herbicides are applied.

**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 the manufacturer's recommendations. In addition, employees must be trained to avoid overspray and to implement dry-clean methods should spills occur. Under no circumstance should employees 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 ecological means, and with the least possible hazard to people, property, and the environment. For further information regarding IPM, please refer to the following webpage:

<http://www.epa.gov/pesticides/factsheets/ipm.htm>

**Standards, BMPs, & Outreach**

<b>Interview Questions</b>	<b>Response</b>
BMP technical guidance document available to maintenance staff?	NO
MS4 use contractual staff to complete MS4 maintenance activities?	YES
BMP guidance materials provided to contracted staff?	YES  The Village of McDonald stated that BMP guidance materials are not currently provided to contracted staff. Guidance materials will be provided once BMP guidance materials are developed.
Requirement to consider stormwater impacts and utilize appropriate BMPs in contracts?	YES
Materials used to educate the public regarding stormwater impacts on MS4 property (if applicable, i.e. public spaces):	Pet waste:  Trumbull SWCD has developed an informational flyer entitled "Think Blue – Pet

Standards, BMPs, & Outreach		
Interview Questions	Response	
	<p>Waste.</p> <p>In addition, the Village of McDonald has a defecation removal ordinance, Section 505.14 of the General Offenses Code, that requires persons to remove animal defecation from private and public properties. Failure to comply with the ordinance is a minor misdemeanor.</p> <p>Litter reduction:</p> <p>Trumbull SWCD has developed various informational flyers and brochures that include "Home Pollution Prevention," "Storm Water Pollution Prevention for the Home," "Good Housekeeping for Trumbull County Residents," "Storm Drain Facts," and "You May Be Polluting Your Watershed and Not Even Know it."</p> <p>In addition, the Village of McDonald has a litter prevention ordinance, Section 521.08 of the General Offenses Code, which prohibits the deposition of litter, garbage, rubbish, junk, etc. on public or private properties or on or in waters of the state.</p>	
Applicable Documents	Reviewed	Obtained
BMP manual or guidance document	No	No
Contract language for MS4 operation and maintenance activities	Yes	No

Notes
<p><b>Technical Guidance and Specifications for Maintenance Staff</b></p> <p>The Village of McDonald must improve the dissemination of technical guidance to its maintenance staff on storm water pollution prevention matters. The Village of McDonald stated that only verbal BMP guidance is provided to employees. Upon its completion, the good housekeeping manual will be provided to employees. The Village of McDonald should also 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 prepared, the Village of McDonald will need to train employees on the SWP3s that have been developed for MS4 owned or operated facilities and should evaluate adopting the standards and specifications for storm water pollution prevention implementation in all of 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 <i>Rainwater Land Development</i> (Ohio Department of Natural Resources, 2006) or the <i>Municipal Pollution Prevention/Good Housekeeping Manual #9</i> (Center for Watershed Protection, September 2008). These manuals can be obtained from the following two respective Web pages:</p> <p style="text-align: center;"><a href="http://www.dnr.state.oh.us/water/rainwater/default.html#id/9186/Default.aspx">http://www.dnr.state.oh.us/water/rainwater/default.html#id/9186/Default.aspx</a></p>

Notes
<a href="http://www.stvp.org/formmaker/Download-Form_RedirectFormPage.html">http://www.stvp.org/formmaker/Download-Form_RedirectFormPage.html</a>

Staff Education and Training			
Interview Questions		Response	
Staff trained to identify potential storm water pollution sources which would result in an illicit discharges?		YES	
Frequency:		The Village of McDonald has copies of information that has been obtained during previous illicit discharge training sessions; however, no records are being maintained that document when illicit discharge training occurred and which employees attended the illicit discharge training.	
Materials used to train staff:		The Village of McDonald stated that the information obtained during previously attended illicit discharge training sessions is utilized to train employees.	
Applicable Documents		Reviewed	Obtained
Training materials		Yes	No

Notes
<p><b><u>MS4 Staff Training</u></b></p> <p>Although key personnel tasked with implementation of the MS4 program have attended previous training events, the Village of McDonald has not developed the required training program expected under the MS4 program. The first generations of Ohio EPA's NPDES MS4 Storm Water General Permit required the Village of McDonald 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 Village of McDonald should evaluate incorporating 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.</p> <p>The Village of McDonald was only able to provide copies of information obtained during previous training sessions. The information is then verbally communicated to employees. For training that the Village of McDonald 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 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.</p>