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SUMMIT

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SUMMIT COUNTY & OTHERS

3GQ00065 2010/07/07

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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

July 7, 2010

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

Mr. Alan F. Keltyka, P.E.
Stormwater Utility Engineer
City of Barberton
576 West Park Avenue
Barberton, OH 44203

Dear Mr. Keltyka:

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) 3GQ00065*BG and Ohio Administrative Code 3745-39.

On June 24, 2010, Ohio EPA met with you and other representatives of the City of Barberton to determine compliance with the NPDES permit and the Storm Water Management Plan (SWMP) submitted by the City in March 2003. In performing this audit, Ohio EPA implemented the Municipal Storm Water Program Evaluation Guide developed by the United States Environmental Protection Agency.

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

Violations:

- **Failure to submit 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 City of Barberton has two 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 both of the completed projects (see attachments for the list of projects).

- **Failure to compile an inventory of all MS4 facilities, i.e. the Service Facility, the Distribution Facility, the WWTP, parks and cemeteries, and parking lots.** This is a violation of Part III.B.6.c of NPDES Permit #OHQ000002 and ORC 6111.04 and 6111.07. This inventory was required in the NPDES permit #OHQ000001 and should be in the City's SWMP. The inventory should be kept up to date in the SWMP and easily accessed to comply with the NPDES Permit #OHQ000002.
- **Failure to ensure adequate long-term operation and maintenance (O&M) 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 is required to have an inventory of all privately-owned post-construction BMPs installed since April 21, 2003 and public stormwater management facilities. The City must develop a program to ensure the long-term maintenance of these structures. Ohio EPA recommends that each facility be inspected at least once a year either by the City or the party responsible for long-term maintenance. We recommend the City develop checklists or adopt checklists as your standard for conducting these inspections. This will ensure that all facilities are inspected and that all BMPs are constructed and maintained according to the City's adopted standards. The City must establish standards for these maintenance tasks. 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. Additional information can be found in the Center for Watershed Protection manual titled ***Managing Stormwater in Your Community: A Guide for Building an Effective Post-Construction Program***. This manual can be downloaded at: http://www.cwp.org/index.php?option=com_docman&task=cat_view&gid=76&Itemid=118

Please refer to the Storm Water Program Evaluation for more information on developing an effective long term maintenance program. A program to ensure long term maintenance of post-construction BMPs typically includes (a) maintaining an inventory of all public and those 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 effectively prohibit illicit discharges into the City's storm sewer system through ordinance or other regulatory mechanism and implement appropriate enforcement procedures and actions.** This is a violation of Part III.B.3.d of the Ohio EPA General Storm Water NPDES permit #OHQ000002. The City was required to enact this ordinance no later than April 3, 2008. The ordinance must satisfy the requirements set forth in Part III.B.3.d of the Small MS4 general permit. A model illicit discharge ordinance is available from either Chagrin River Watershed Partners at www.cwbp.org or the Northeast Ohio Areawide Coordinating Agency at www.noaca.org. Please provide me with a schedule for enacting the illicit discharge ordinance and establishing an illicit discharge detection and elimination program.

- **Failure to provide controls for reducing or eliminating the discharge of pollutants from maintenance and storage yards at the Service Facility and the Distribution Facility.** 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 sediment and other material pollutants to the two stormwater inlets at the back of the maintenance yard at the Service Facility.
 - Failure to direct all wastewater generated during vehicle and equipment washing operations on the outdoor wash pad to a sanitary sewer system or other wastewater treatment system, or otherwise preventing its discharge.
 - Failure to prevent the discharge of pollutants from a dripping tar distributor to an indoor floor drain connected to storm sewers.
 - Failure to provide containment for the small stockpile of street sweepings at the Service Facility. Refer to the Maintenance Facility Field Inspection Worksheet for the Service Facility for more information.
 - Failure to prevent the discharge of sediment laden runoff to the floor drain connected to storm sewers inside the old Armory Building.
 - Failure to implement sediment controls around material stockpiles, e.g. sand, topsoil, 304 piles, and B14 piles throughout both service yards.
 - Failure to prevent the discharge of pollutants such as paints into the catch basin at the back of the Distribution Facility.
 - Failure to prevent the discharge of excavated materials to a canal adjacent to the Distribution Facility.
 - Failure to provide containment for hazardous materials, e.g. full barrels, recycled batteries, old tanks and open asphalt sealer containers, all stored outside the Distribution Facility, exposed to the elements. The leakage that has already occurred must be cleaned up and the area remediated.
 - Failure to keep all dumpsters at both facilities lidded and plugged to prevent the discharge of wastewater to the City's MS4.

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, inlet protection, lidded dumpsters and capping floor drains achieves this goal. Please review the comments within the attached *Municipal Storm Water Program Evaluation and Maintenance Facility Field Inspection Worksheets* regarding these operations.

Deficiencies:

- A storm water pollution prevention plan (SWP3) has not yet been developed for the Distribution Facility. The plan for the Service Facility is complete and inspections are ready to be implemented with an inspection checklist in 2010. Per Part III.B.6.c of the NPDES permit, these plans must be developed and implemented by **June 2011**. The SWP3s for these facilities should include a checklist by which to conduct the inspections.

This will standardize inspections and remind inspectors of the critical areas that must be reviewed during an inspection.

- The SWP3s for municipal facilities subject to this program must provide a storm water contact or pollution prevention team for each facility. At a minimum, we recommend that a storm water contact be designated for the Service Facility and the Distribution Facility 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 needs to track salt usage on a January-to-December calendar basis rather than a seasonal total as stated in Part IV.C of the Small MS4 NPDES Permit #OHQ000002 for reporting with the New Annual Report form.
- 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 car impoundment, herbicide/ pesticide application and mulching services, as well as road maintenance activities and emergency repairs. Further, we recommend periodic inspection of their operations to assure that they are implementing BMPs.
- 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 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.
- Although some training has been offered to Service Facility staff, the City has not developed the required staff training program expected under the MS4 program for all City employees, including staffs from the Distribution (Utilities) Facility. 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.

Please review my comments and provide me with a letter of response indicating the actions you will take to address my concerns and the time frame in which you plan to implement your corrections. **Your response should be received no later than August 6, 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.

MR. ALAN F. KELTYKA, P.E.
JULY 7, 2010
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If you have any questions, please contact me at (330) 963-1164 or via e-mail at lindsie.macpherson@epa.state.oh.us.

Sincerely,

A handwritten signature in black ink, appearing to read "Lindsie MacPherson". The signature is fluid and cursive, with a long horizontal stroke at the end.

Lindsie MacPherson
Assistant to the District Engineer
Division of Surface Water

LM:bo

cc: Bob Genet, Mayor
Elwood Palmer, Service Director
Dave White, Summit County Storm Water Program Manager (c/o Summit County
Engineer Office)

ec: Dan Bogoevski, NEDO, DSW

Municipal Storm Water Program Evaluation MS4 Maintenance Component Worksheet

| | |
|------------------------------|-------------------------------|
| Date of Evaluation | June 24, 2010 |
| Evaluator Name, Title | Lindsie MacPherson, DSW, NEDO |
| MS4 Permittee | City of Barberton |

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 |
| Alan F. Kelyka Stormwater Utility Engineer | City of Barberton | 330.848.6724 akelyka@cityofbarberton.com |
| Tom Jackson Street Superintendent | City of Barberton | 330.848.6741 tjackson@cityofbarberton.com |

| MS4 Mapping | | |
|---|--|-----------|
| Interview Questions | Response | |
| Outfalls and receiving waters mapped? | YES | |
| Catch basins? | YES | |
| Pipes, ditches, other conduits? | YES – the city is mapping ditches now | |
| Public stormwater facilities (BMPs)? | YES | |
| Private stormwater facilities (BMPs)? | YES –most are mapped | |
| How maps are used (i.e. tracking illicit discharges)? | The City uses the MS4 map for illicit discharge tracking as part of their illicit discharge detection and elimination program. The map is also used to do work on the storm sewer system, e.g. street sweeping, main flushing, catch basin cleaning and repair, etc. | |
| Applicable Documents | Reviewed | Obtained |
| Map(s) of MS4 system | YES | Sent Copy |

| Notes |
|---|
| <p>MS4 Mapping All outfalls in the City of Barberton have been mapped by the Cuyahoga County Board of Health (CCBH) back in 2003. The City has lost their GIS department, but is working with interns to try to rehabilitate the program. At this time, the City has a contract with CT Consultants which covers their MS4 mapping. A lot of the information used for the City's mapping is taken from the Summit County GIS map. The MS4 map the City currently uses has all catch basins, most public/private stormwater management facilities, as well as all storm sewer mains and laterals mapped. All the information on the MS4, including tracking of repairs and problem areas, has been added to the map electronically.</p> |

Notes

The City is working on the mapping of ditches and conduits, integrating the outfalls mapped by the CCBH to the GIS storm sewer map, and updating the map as road and sewer projects progress. Part of the upgrading for the City's GIS system is to start tracking down all private stormwater facilities and have them mapped on the City's MS4 map as well.

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, conduits** 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.

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

All HSTSs in the City of Barberton are mapped, and the City is working on separating the mapping system into on-site and off-site discharges. The City uses CCBH and Summit County Health Department for source tracking with the septic systems. There are about 150 HSTSs in the City.

Please be aware that these discharging systems are considered illicit discharges to the MS4. Permit #OHQ000002 requires the City to work with the County Health Department to determine which of these systems are not operating as designed and intended. For systems not operating as designed and intended, the Health Department 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 a contract with the Cuyahoga County Board of Health for dry weather screening, outfall sampling, and source tracking of illicit discharges. An annual report is sent to the City on all dry-weather screening completed. Twenty-five percent of the City's outfalls are screened each year. Once an illicit discharge is detected, it is tracked, and once the source is found, enforcement would have to be from the Health Department because the City has not passed their IDDE ordinance at this time. (3 examples of illicit discharges were given at the time of the interview; all have been tracked and eliminated or dissipated.)

The City has not adopted an Illicit Discharge Detection and Elimination Ordinance. This is a violation of Part III.B.3.d of the NPDES permit # OHQ000002 which states that the City must effectively prohibit, through ordinance, or other such mechanism, illicit discharges into the City's MS4 and implement appropriate enforcement procedures and actions. The Ordinance is about 95% complete and almost ready to go to legal to finalize it. The Ordinance was put together by CT Consultants.

Please be aware that the NPDES permit #OHQ000002 requires the City to perform dry weather screening at all outfalls at least once by June 2014 and that a plan should be in place to do so. *If any illicit discharges are detected during this screening, the city must develop a plan to eliminate them.* For more information on the illicit discharges from HSTSs please read Part III.B.3.e of the Ohio EPA General Storm Water NPDES Permit for small MS4s #OHQ000002 for expectations to address these sources.

| Catch Basin Cleaning | | |
|--|--|--------------------|
| Interview Question | Response | |
| Schedule established for inspections and cleaning? | YES Every catch basin is inspected and cleaned each year. The City is sectioned off into 4 to 5 areas and catch basins are cleaned with a vactor truck. The trucks are usually out every day unless needed elsewhere. There is an inlet grate cleaning program as well. | |
| Is cleaning and maintenance of catch basins tracked: | YES Tracking takes place daily. The date and location of cleaning is tracked in the field as well as yards of spoils the vactor picks up. There is an end of the year summary of all catch basin cleaning, locations cleaned and amount picked up. | |
| How are spoils materials disposed of? | The spoils are taken to the City's WWTP and filtered through a screen for treatment. There is a dewatering pad where drains lead back to the plant. Once the spoils are dewatered they are transferred to a dumpster at the back of the facility. The remaining solids are taken to American Landfill in Waynesburg, OH. | |
| Are storm drain pipes inspected? Proactive or only in response to blockage event? | YES The storm sewer system is inspected and cleaned on an as needed basis. The City Service Department shares the TV camera with the Utilities department and will use this to track problems. | |
| | Applicable Documents | Reviewed |
| | List of active municipal construction projects | NO |
| | CHECK DATABASE BEFORE INSPECTION: | Obtained |
| | List of municipal projects covered under the Ohio EPA general storm water NPDES permit for construction activities | |
| | 3GC02806*AG – Community Center Parking Lot *NOT | DONE - FILE NOT |
| | 3GC03971*AG – Barberton North end Fire Station *NOT | DONE - FILE NOT |
| | WWTP Improvements 2009 Rehabilitation – **No Permit required | |
| | NOTE: Permit is only required if project disturbs 1 or more acre (5 or more acres for "routine maintenance") | |

| Notes |
|--|
| <p><u>MS4 System Repair and Maintenance</u></p> <p>The EPA would like to see a more proactive inspection of the storm pipes in the coming years of the new permit term to help improve your MS4 program and reduce pollutants.</p> <p><u>Municipal Construction Projects</u></p> <p>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.</p> |

| Stormwater Management Facilities Operation and Maintenance | | | |
|--|--|-----------------|-----------------|
| Interview Questions | Response | | |
| Public facilities inspected? Frequency: | SOME | | |
| | A schedule has not yet been established for the inspection of public facilities. Inspections are currently complain-driven or only for facilities with known drainage problems. Inspections are logged with pictures but no checklist is used. | | |
| Private facilities inspected? Frequency: | NO | | |
| | No inspection program has been developed for private facilities. See Notes. | | |
| Checklist used for inspections? | NO | | |
| | The City has created an inspection checklist for stormwater management facilities but has not used it at this time. | | |
| Have maintenance standards and procedures been established for these facilities? | NO | | |
| | For construction, owner must follow the Sediment and Erosion Ordinance but the City has not adopted standards or procedures for stormwater management facilities. | | |
| How is maintenance prioritized? Is data evaluated to target maintenance resources? | NO | | |
| | Inspections are only done on an as needed basis. When there is an instance of heavy rainfall, they will go and inspect the facilities. | | |
| Applicable Documents | | Reviewed | Obtained |
| Inspection checklist | | NO | NO |

Notes

Inspections of Stormwater Management Facilities

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. Stormwater 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).

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. *A checklist is recommended to perform inspections and 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 (d) of NPDES Permit #OHQ000002. The City has not yet introduced legislation to formalize a long-term operation and maintenance (O&M) program for post-construction BMPs. Information on developing an effective long-term maintenance program for post-construction BMPs can be found from the Center for Watershed Protection at <http://www.cwp.org/> free downloads page (**Tool 6: Plan Review, BMP Construction, and Maintenance Checklists)

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.

BMP Inspection Checklists

The City has developed an inspection checklist for stormwater management facilities, but has not yet put the checklist to use. As the installation of low-impact development (LID) BMPs and non-structural BMPs propagates, be sure that checklists are developed for use with these practices. The checklist used to perform inspections should be reflective of the operation and maintenance standards established by the City (see preceding paragraph).

| Road Maintenance | |
|---|--|
| Interview Questions | Response |
| <p>Streets regularly swept?</p> <p>Frequency:</p> | <p style="text-align: center;">YES</p> <p>The street sweeping schedule is posted on the City's web-site. Streets are swept weekly (Sunday through Thursday) as weather permits. All routes are set and the City follows a strict schedule. All curbed streets are swept once a week. The Eastside and Austin Estates are spilt and swept once every two weeks on Sundays.</p> |
| <p>Frequency based on water quality factors (e.g. proximity to streams)?</p> | <p style="text-align: center;">YES</p> <p>All curbed streets are swept weekly. If there are heavy rains the City will go through to some of the uncurbed streets to clean up debris.</p> |
| <p>How are spoils disposed of?</p> | <p>The street sweeping spoils are taken to the same location as catch basin cleanings; to the City's WWTP and filtered through a screen for dewatering and treatment. The remaining solids are taken to American Landfill in Waynesburg, OH.</p> <p>The City would like to use street sweepings for beneficial reuse. This would include screening the sweepings and mixing them with a product from the WWTP and composted material to create a usable material for reuse.</p> <p>The WWTP use to run the spoils through a screen to remove oversized waste. The fines were then stockpiled at the back of the WWTP but nothing has been done with these screened sweepings since. See notes for information on the Division of Solid and Infectious Waste Management (DSIWM) and their Integrated Alternative Waste Management Program (IAWMP).</p> |
| <p>Does the community collect road kill?</p> <p>What do they do with the carcasses?</p> | <p style="text-align: center;">YES</p> <p>All carcasses are thrown in a solid waste dumpster located at the Service Facility.</p> |
| <p>Does the community have a leaf collection program?</p> <p>What do they do with the collected leaves?</p> | <p style="text-align: center;">YES</p> <p>The City runs a curb-side pick-up program in the fall for leaf collection. The City is broken up into different wards to more efficiently</p> |

| Road Maintenance | |
|---|---|
| Interview Questions | Response |
| | <p>collect for the entire community. The City is under contract with Mulch Makers to take their leaves for composting and mulching. The city mulches the leaves before they are taken to drop off areas for Mulch Makers to pick-up.</p> <p>There are drop zones at parks through-out the City for the leaves and bagged leaves from residents. The material sits for no longer than 48 to 72 hours before pick up.</p> |
| <p>BMPs used during road maintenance activities?</p> <p>Describe types of road maintenance conducted by community staff and the BMPs used:</p> <p>Some painting of cross walks, arrows, cold patching, hot mix patching (chip seal), minor paving</p> | <p>YES</p> <p>The City uses water soluble paints and all water during construction is blocked off from reaching the storm sewer. If anything does enter the MS4 the City will use the vector to Hydro-excavation the system.</p> |
| <p>BMP guidance available to field staff?</p> | <p>YES</p> <p>The City runs a training session once a year. BMP talks are presented to the street department and sewer department. Booklets and posters are available but not provided but one-on-one training is constant. Alan will walk around to crews. There is a lot of cross training that occurs at the service department to keep all crews knowledgeable.</p> <p>Ohio EPA recommends that refresher training be provided on an annual basis and that implementation of storm water BMPs be discussed with field staff before a job is started.</p> |
| <p>Deicers used by MS4?</p> | <p>YES</p> <p>The primary deicer used is road salt (NaCl). In 2009-2010 the City started mixing in brine with their salt and used 5,000 gal of brine for the last winter season. Hydro melt is sprayed in low temperatures below 18 degrees.</p> |
| <p>Type and amount of deicer and additives tracked?</p> <p>What measures are being taken to minimize the application of deicers?</p> | <p>YES</p> <p>Every truck that goes out has a worksheet for recording the route taken and the amount of salt used. Spreaders with the brine attachment must also indicate the amount of brine sprayed.</p> |

| Road Maintenance | | |
|--|--|-----------------|
| Interview Questions | Response | |
| | <p>Summary is done by storm events. Then end of the year totals are found from tallying the storm event totals. Please make sure the total given in the City's annual report is a calendar year total from January to December.</p> <p>Crews are trained on minimalizing salt application. At the beginning of every season spreaders are calibrated. Sensible salting practices are carried out through training and the program in general. The City should consider adopting some of these practices into their SWMP.</p> | |
| <p>Sand/salt swept up after application?</p> <p>How soon?</p> | YES | |
| <p>Does your community operate a snow stockpile yard to store snow that has been removed from community streets and parking lots?</p> <p>If YES, location of the yards:</p> <p>Has your community considered implementing best management practices to control the discharge of pollutants from snowmelt associated with snow storage yards?</p> | <p style="text-align: center;">YES</p> <p>The City of Barberton uses the hard surface parking lot at the old school where there are no catch basins.</p> <p>The City is looking at storing downtown snow on a trail in one of the parks. Mr. Kelyka was researching ways to remove salt from the pile but had no such luck. This location has not been used at this time.</p> | |
| Applicable Documents | Reviewed | Obtained |
| BMP guidance | YES | YES |
| Street sweeping records | YES | YES |
| Deicer application records | YES | YES |

| Notes |
|--|
| <p>Street Sweeping</p> <p>The City of Barberton sends street sweeping spoils to the City's WWTP and dewateres the spoils before transferring them to the back, where they are stockpiled and landfilled as needed. This area is contained and all runoff is collected and circulated back to the plant when the lagoon reaches maximum capacity. The City would like to use street sweepings for beneficial reuse, but at this time, street sweepings are still considered a solid waste. The process the City is considering would involve screening the spoils to remove oversized waste and mixing the fines with EQ sewage sludge and composted material to create a usable material for reuse.</p> |

Notes

The Division of Solid and Infectious Waste Management (DSIWM) does have an *Integrated Alternative Waste Management Program (IAWMP)* that may be used to approve alternative waste disposal projects in agreement with OAC rule 3745-27-05(A)(4). For additional information regarding the IAWMP, please contact Dave Dysel (330-963-1286 or via email at Dave.Dysle@epa.state.oh.us) of DSIWM or refer to the Alternative Waste Management Project Request Form, which can be obtained from the following website address: <http://www.epa.ohio.gov/dsiwm/pages/forms.aspx>. I have talked with Dave and he would be happy to help the City of Barberton evaluate whether this process would be viable with the beneficial reuse program and the IAWMP. The City should send in a letter to Dave Dysel, along with the form above, noting the amount of materials to be used and an explanation on how the City plans to reuse the materials and the process to do so.

Deicer Usage

**Please be sure to report the City's total salt, brine, and hydro melt usage per calendar year (January to December) in the annual report for 2010 as stated in Part IV.C.2 on reporting of the Ohio EPA General Storm Water NPDES Permit for small MS4s #OHQ000002.*

Flood Management

| Interview Questions | Response | | | | |
|--|---|----------|----------|-----|----|
| Inventory of flood management structures completed? | <p align="center">YES</p> <p>They are mapped on the GIS MS4 map. This map comes with a coordinate list of all locations.</p> | | | | |
| Structures been assessed for stormwater retrofit? | <p align="center">YES</p> <p>There are proposals out to look at upgrading a few of the facilities to treat water quality. At this time cost is preventing the City from moving forward with these projects.</p> | | | | |
| New structures include water quality considerations? | <p align="center">YES</p> <p>The City has had a re-write of the Stormwater Management Ordinance that requires all new structure to consider water quality.</p> | | | | |
| Applicable Documents | | | | | |
| Inventory | <table border="1"> <thead> <tr> <th align="center">Reviewed</th> <th align="center">Obtained</th> </tr> </thead> <tbody> <tr> <td align="center">YES</td> <td align="center">NO</td> </tr> </tbody> </table> | Reviewed | Obtained | YES | NO |
| Reviewed | Obtained | | | | |
| YES | NO | | | | |

Notes

Inventory

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

Stormwater Retrofits

The City of Barberton has a riparian restoration project underway for this summer. Native prairie grasses are going to be added to Edgewood park and the City will be diverting some runoff to this 1 acre area for treatment by holding water for at least 24 hrs to treat quality. The City is also considering turning the brick areas downtown into bioretention cells and planting a rain garden in front of the Service Facility for treating the stormwater runoff at the front of the facility near the front door.

Notes

The City's public stormwater management facilities should be looked at for possible retrofit opportunities so that they treat the Water Quality Volume (WQv). The current MS4 permit (OHQ000002) does not require the City to implement retrofit projects, but they are an important piece of the storm water management puzzle for older, developed parts of the community. Current post-construction requirements only affect areas where new development or redevelopment disturbs 1 or more acre of land. This program will not create BMPs in previously-developed areas unless they are being redeveloped and the 1-acre threshold is met. As such, US EPA is evaluating whether retrofits should be required in future generations of the MS4 permit.

It is important to look for retrofit opportunities by making a list of potential water quality enhancement projects and focusing on the implementation of green infrastructure. Typically, retrofitting the outlet structures of existing detention and retention basins to provide extended detention of the WQv is the easiest and most feasible type of retrofit project. However, preferred retrofit projects include installing bioretention cells in existing parking lots or along residential streets, resurfacing with permeable pavement and establishing incentive programs for rain gardens, rain barrels and other forms of downspout disconnection in residential neighborhoods.

| Facilities Operation & Maintenance | | | | | | | | | | | | | |
|--|--|--------------------------|------------------------|-----------|--------------------------|-----------|--------------------------|-----------|--------------------------|-----------|--------------------------|------------|------------------|
| Interview Questions | Response | | | | | | | | | | | | |
| Inventory of MS4 facilities complete (i.e. facilities owned and operated by the MS4)? | NO | | | | | | | | | | | | |
| <p><u>Types of facilities included</u> <i>These need their own NPDES storm water permit for industrial activities, if there is a discharge of runoff from these operations:</i></p> <ul style="list-style-type: none"> • Landfills Type: • Airports • Shipping Ports or Marinas • Steam Electric Power Plants • Wastewater Treatment Plants ≥ 1 MGD or with a pretreatment program <p style="margin-left: 40px;">Barberton WPCF (3PD00004*JD) 5087 South Van Buren Avenue Barberton, OH 44203</p> <p><i>These do not need their own permit, but do have to develop an SWP3 unless noted as N/A:</i></p> <ul style="list-style-type: none"> • Impound Lots – contracted to Bill's Towing • Leaf Collection Yards <ul style="list-style-type: none"> ✓ No discharge of leafate permitted | <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;"><u>Response</u></th> <th style="text-align: center;"><u>SWP3 Developed?</u></th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">NO</td> <td>N/A since do not operate</td> </tr> <tr> <td style="text-align: center;">NO</td> <td>N/A since do not operate</td> </tr> <tr> <td style="text-align: center;">NO</td> <td>N/A since do not operate</td> </tr> <tr> <td style="text-align: center;">NO</td> <td>N/A since do not operate</td> </tr> <tr> <td style="text-align: center;">YES</td> <td>NO - no exposure</td> </tr> </tbody> </table> | <u>Response</u> | <u>SWP3 Developed?</u> | NO | N/A since do not operate | YES | NO - no exposure |
| <u>Response</u> | <u>SWP3 Developed?</u> | | | | | | | | | | | | |
| NO | N/A since do not operate | | | | | | | | | | | | |
| NO | N/A since do not operate | | | | | | | | | | | | |
| NO | N/A since do not operate | | | | | | | | | | | | |
| NO | N/A since do not operate | | | | | | | | | | | | |
| YES | NO - no exposure | | | | | | | | | | | | |
| | NO | N/A since do not operate | | | | | | | | | | | |
| | NO | N/A since do not operate | | | | | | | | | | | |

Facilities Operation & Maintenance

| Interview Questions | Response | |
|---|----------|--------------------------|
| | Response | SWP3 Developed? |
| <ul style="list-style-type: none"> • Maintenance Yards <ul style="list-style-type: none"> ➤ How many do they operate? 2 ➤ List facility names/locations: | YES | |
| <p align="center">Service Department 677 Brady Avenue Barberton, OH 44203</p> | | YES |
| <p align="center">Distribution Facility 173 Water Street Barberton, Oh 44203</p> | | NO |
| <ul style="list-style-type: none"> • Composting Operations –Mulch Makers | NO | N/A since do not operate |
| <ul style="list-style-type: none"> • Solid Waste Transfer Stations or Operations | NO | N/A since do not operate |
| <ul style="list-style-type: none"> • Parks & Cemeteries <ul style="list-style-type: none"> ➤ How many in UA? 15 ➤ List facility names/locations: | YES | N/A |
| <ul style="list-style-type: none"> • Parking Lots <ul style="list-style-type: none"> ➤ How many do they operate? 22 ➤ List facility name/locations: | YES | N/A |
| <ul style="list-style-type: none"> • Bus Terminals | NO | N/A since do not operate |
| <ul style="list-style-type: none"> • Vehicle Maintenance Garages <ul style="list-style-type: none"> ➤ How many do they operate? ➤ List facility name/locations: | YES | |
| <p align="center">Service Department 677 Brady Avenue Barberton, OH 44203</p> | | YES |
| <p align="center">Distribution Facility 173 Water Street Barberton, Oh 44203</p> | | NO |

| Facilities Operation & Maintenance | |
|--|---|
| Interview Questions | Response |
| Facilities inspected? Frequency: | NO The City has a plan to begin developing a site evaluation inspection for all facilities requiring a SWP3. Inspections are scheduled to start in 2010 for the Service Facility. Please be sure the SWP3 for the Utilities Department also includes inspection requirements. |
| Checklist used? | NO The City has a template for a checklist and is working on modifying it for use in the SWP3s for the Service and Utilities Departments. 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): | Alan Kelyka and Tom Jackson will perform the inspections for the Service Department and Alan will Perform the inspections for the Utilities Department. |
| Is there a designated stormwater contact person for each facility? | YES The City has assigned a storm water contact person for the Service Facility: Tom Jackson. Alan Kelyka is working on a plan to designate a representative for all other 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? | The City will use their discipline procedures (observation, comments and action). They are able to apply these to the MS4 but have never done so. |
| Parking lots owned/operated by the permittee swept? Frequency? | YES Parking Lots are swept on an as needed basis and as requested. The City tries to get through all parking lots annually and as events require sweeping. |
| Do you have any combined sewer systems? | NO |
| If yes, do you have any combined sewer overflows? | NO |

| Facilities Operation & Maintenance | | |
|--|--|-----------------|
| Interview Questions | Response | |
| <p>Are you aware of any illicit cross connections between your sanitary sewer and MS4?</p> <p>If so, what is your plan to eliminate this illicit discharge?</p> | <p>NO</p> <p>The City is not aware of any cross connections at this time, but when an illicit cross connection is found, it is tracked and eliminated.</p> <p>Recently, there were illicit discharges at 3rd and Liberty where sanitary was dumping into storm and E. 4th where a washing machine was connected to storm. Both were corrected. There is an ongoing list of any cross-connection found and eliminated.</p> | |
| <p>Have you investigated the extent of infiltration and inflow into storm sewer system?</p> <p>What methods have been used to conduct this investigation?</p> <p>What are your plans to repair and eliminate this source of illicit discharge?</p> | <p>NO</p> <p>The City does not have a proactive program at this time. Main focus is on sanitary I/I, but when needed the City will investigate into storm sewer infiltration.</p> <p>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. 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.</p> | |
| <p>Sewer spill and cleanup procedures in place?</p> | <p>YES</p> <p>The WWTP and the Fire Department have a spill response plan that the City follows.</p> | |
| Applicable Documents | Reviewed | Obtained |
| Facility inventory | NO | NO |
| Facility SWPPP | 1 of 2 | 1 of 2 |

| Notes |
|--|
| <p>Facility Inventory</p> <p>The City has not compiled an inventory of all MS4 facilities. This inventory was required in the NPDES permit #OHQ000001 and should be in the City's SWMP. The inventory should be kept up to date in the SWMP and easily accessed to comply with the NPDES Permit #OHQ000002.</p> |
| <p>Storm Water Pollution Prevention Plans (SWP3)</p> <p>A Storm Water Pollution Prevention Plan (SWP3) must be developed and implemented for the following facilities:</p> |

Notes

Service Department
677 Brady Avenue
Barberton, OH 44203

Distribution Facility
173 Water Street
Barberton, Oh 44203

The Ohio EPA General Storm Water NPDES Permit for Small MS4s #OHQ000002 requires the City of Barberton 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 a frequency specified in the SWP3. Ohio EPA recommends that facilities be inspected monthly. A comprehensive site evaluation must be conducted at least once per year and a record of that inspection and its findings must be kept with the SWP3. If this annual inspection reveals deficiencies in the SWP3 or BMPs that are ineffective, the SWP3 must be revised to correct the problems. The SWP3 should contain a checklist to provide consistency to facility inspections. The SWP3 should also identify who is responsible for facility inspections as well as a storm water 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

Pesticides, Herbicides & Fertilizers

| Interview Questions | Response |
|--|---|
| Certified applicators used? | YES The City has one certified applicator, Ryan Kauffman, and the rest of the staffs are trained under him. <i>See Notes on Certified Applicator Requirements.</i> |
| Integrated Pest Management (IPM) practices used? | NO |
| Storage location of pesticides, herbicides, and fertilizers: | Fertilizer is stored in the old armory building at the Service facility as well as pesticides and herbicides. If the City wishes to remove this building from their SWP3, since it is not on City property, they need to remove all City owned materials and equipment from the building. <i>See notes on the storage of these chemicals.</i> |
| BMPs used during application: | Mr. Ryan Kauffman does not spray during windy weather and he follows all training he has received. |
| Fertilizer/pesticide application plan utilized? | NO No plan has been developed at this time. |

| Applicable Documents | Reviewed | Obtained |
|---------------------------------------|----------|----------|
| Fertilizer/pesticide application plan | NO | NO |

Notes

Overall Application

Overall, the City of Barberton does not use a lot of fertilizers, pesticides, or herbicides. When the City does run into a case where these actions are necessary, they try to minimize application as much as possible. For the sports center, all herbicide and pesticide spraying is contracted out. The City is looking at resorting to No Mow grasses for the parks to get away from chemical application.

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.

Pesticide, Herbicide and Fertilizer Storage Requirements:

Pesticides cannot be stored above or against medicines, foods, feeds or toys. They cannot be stored in a room where a spill would result in a release to the environment (such as a room with a floor drain connected to the storm sewer...if you run across this, the floor drain should be capped or the pesticide should be in secondary containment). Containers must be labeled to identify the material they contain. Products with a skull and cross bones on the label cannot be stored in an area that can be accessed by children. The Department of Agriculture recommends these products be stored in a locked cabinet. Pesticides must be stored in a room (or cabinet) that is capable of being locked when not attended. The Dept of Agriculture also recommends that a spill kit and fire extinguisher be kept nearby and that personal protective equipment is available for use if necessary.

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>.

| Notes |
|---|
| <p>Application Plan</p> <p>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 <i>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.</i></p> <p>Please provide me with a copy of the City's pesticide, herbicide and fertilizer application plan.</p> |

| Standards, BMPs, & Outreach | | |
|--|--|-----------------|
| Interview Questions | Response | |
| BMP technical guidance document available to maintenance staff? | YES | |
| | There is a significant amount of training for all maintenance staffs that has all been documented. The City should consider hanging up posters of BMPs for municipal operations or providing staffs with booklets of BMPs to be implemented during municipal activities. | |
| MS4 use contractual staff to complete MS4 maintenance activities? | YES | |
| | The City of Barberton contracts out car impoundment, mulching, paint striping, fertilizing and turf management, emergency repairs, and tree waste collection. | |
| BMP guidance materials provided to contracted staff? | NO | |
| Requirement to consider stormwater impacts and utilize appropriate BMPs in contracts? | NO | |
| | Not sure if contract language is there or not. | |
| Materials used to educate the public regarding stormwater impacts on MS4 property (if applicable, i.e. public spaces): | <p><u>Pet waste:</u> There are 7 doggie stations throughout the City.</p> <p><u>Litter reduction:</u> The City has scheduled Clean-up days. There is a program called YES (youth employment services) for litter clean up.</p> | |
| | Applicable Documents | Reviewed |
| | | Obtained |
| BMP manual or guidance document | YES | YES |
| Contract language for MS4 operation and maintenance activities | NO | NO |

Notes

Technical Guidance and Specifications for Maintenance Staff

The City needs to improve 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. An example poster developed by the Lake County (OH) Stormwater Management Department was given to Tom Jackson at the time of the interview. This will help reinforce employee training.

Once it is prepared, the City will need to train staff on the SWP3 for the Service Facility and Distribution Facility and should look to adopt standards and specifications for storm water pollution prevention implementation in all its municipal operations with the potential to ease pollutants in storm water runoff (e.g., *prohibiting the Fire Department from washing vehicles outside and providing inlet protection at parks with baseball diamonds etc*). 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/>

Contracted Staff

Contracted staff include: Impoundment, mulching, paint striping, fertilizing turf management, emergency repairs, and tree waste collection. 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 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.

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 Staffs are trained annually and usually more programs are added on as the year goes by such as workshops and stormwater conferences. *Please be sure all field staffs are receiving training, including employees at the Distribution Facility (Utilities Department). |
| Materials used to train staff: | CCBH training on PPGH (1/22/09 and 12/22/09) LTAP program Monthly education involvement meetings Stormwater Conference MCM 6 training |

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

| Notes |
|---|
| <p>MS4 Staff Training</p> <p>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. <i>Please note that NPDES permit #OHQ000002 requires the City to conduct at least one employee training event on these topics per year.</i> 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.</p> <p>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 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> <p>The following materials may help with developing a training program:</p> <p>Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) has 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: http://epa.ohio.gov/ocapp/storm_water.aspx and can be used to provide training to your staff. Future training events involving Ohio EPA are listed on this site as well.</p> <p>ODOT's Local Technical Assistance Program (LTAP) maintains a library of training videos, including videos on storm water pollution prevention that can be borrowed at no cost.</p> <p>US EPA has 2 to 3 webcasts per minimum control measure that can be viewed at any time over the internet at www.epa.gov/npdes/training.</p> <p>The Center for Watershed Protection also has information available for training in their Manual #9: Municipal Pollution Prevention/Good Housekeeping Practices.</p> <p>The Lake County (OH) Stormwater Management Department has developed a series of Toolbox Talks that can be used during staff meetings to train maintenance staff on a single storm water pollution prevention topic at a time. This tool is intended to provide training by eliciting discussion amongst the staff and can be completed in less than 15 minutes per topic. Please contact Tim Miller, Director of the LCSMD at (440) 350-5900 for further information.</p> |

FIELD INSPECTION WORKSHEET

MS4 SWMP Evaluation

MS4 Maintenance Facility Field Inspection Worksheet

| | |
|--|---|
| Permittee: City of Barberton Service Facility | |
| Address of facility: 677 Brady Avenue, Barberton 44203 | Size of facility: |
| Date of visit: 6/24/2010 | Time of visit: 1:30 p.m. |
| Provide the name(s) and title(s) of permittee staff present during inspection | |
| Name | Title |
| <i>Alan Keltyka, P.E.</i> | <i>Stormwater Utility Manager</i> |
| <i>Tom Jackson</i> | <i>Streets Superintendent</i> |
| Evaluator Observations: | |
| SWPPP or stormwater plan | |
| Has the maintenance facility developed a SWPPP or stormwater plan? | In Process. City is still developing the SWP3 for this facility. The plan must be completed and implemented by June 2011. The City has completed all aspects of the SWP3 for this facility except for the site inspection. They plan to begin site inspections in 2010 using the developed checklist. |
| Does the plan include a site map, list of pollutant sources, BMPs, and maintenance procedures? | YES. The SWP3 in progress includes various site maps, a list of pollutant sources, BMPs, and maintenance procedures. |
| Does the permittee conduct and document periodic inspections of the facility? | NO. The facility must be inspected for the implementation of storm water best management practices (BMPs) at a frequency specified in the SWP3. Ohio EPA recommends that the facility be inspected once per month. In addition, you must conduct a Comprehensive Site Evaluation annually. |
| Are storm drains labeled and free of debris? | NO. Drains are not labeled and not free of debris. The 2 catch basins in the back maintenance yard <i>both need inlet protection to prevent the discharge of sediment runoff from the service yard.</i> |
| Vehicle maintenance, fueling and washing | |
| Are vehicle maintenance activities conducted in a designated place not exposed to stormwater? | Yes. All vehicle maintenance occurs indoors, where the floor drains are directed to oil/water separators, cleaned annually, and then to sanitary. |
| Are fueling stations properly designed with spill kits nearby? | Yes. The fueling station is well equipped with a spill kit which has been clearly labeled, a labeled emergency shut off button, and a roof for cover. |
| Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer? | Yes. The City washes all vehicles and equipment inside where floor drains are connected to sanitary or on the wash pad out in the service yard, where the catch basin is connected to a tank to separate the grit and debris before transporting the water to sanitary. Be sure all wash-water on the wash pad is discharging to the specified catch basin. During inspection, some wash |

| | |
|---|---|
| | water was noted discharging to the adjacent catch basin still connected to storm. |
| Material storage | |
| Are all materials that are potential stormwater contaminants stored under cover or in secondary containment? | <p>The City should place all necessary drums and barrels on the secondary containment pads purchased.</p> <p>In the equipment storage building, the floor drains are connected to storm. A tar distributor is parked directly over one of the storm drains. The distributor needs to be moved and the area remediated, or the City should place a pad over the drain to prevent the discharge of pollutants.</p> <p>Street sweepings were found dumped at the service yard. The spoils remain in this location for 24-36 hours before being transported to the WWTP.</p> <p>Top soil, gravel, sand, C&DD, and fill are stockpiled throughout the service yard with no sediment controls.</p> <p>Hydro melt tank has no secondary containment. Make sure there is a spill kit near the tank in the case of any minor spills.</p> |
| Hazardous waste management | |
| Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff? | The used oil container is labeled "Used Oil." The City burns all its used oil to heat the facility. |
| Waste management | |
| Are waste bins covered with waste properly disposed in containers? | All dumpsters on site need to be lidded, plugged, and inspected for leaks on a regular basis. |
| How is landscape waste stored? | The City does not collect landscape waste from residents. |
| Spill response | |
| Does the facility have a spill response plan, and are spill kits readily available? | A spill response plan is a required component of the SWP3. The City has recently purchased spill kits to place in areas with vehicle maintenance and drum storage. A good housekeeping BMP is to sweep up all oil-dri and dispose of it properly once it has done its job. |
| Employee training | |
| What type of stormwater training do maintenance staffs receive? | Training on storm water pollution prevention is required for the staff at this facility. See interview for the training staffs have received. |
| Notes or additional information: | |
| <u>Armory Building</u> | |
| The City of Barberton stores a few items in the old armory building that is ready to be demolished. The building is not on City property, but they are storing materials in the garage none the less. There is a storm drain at the front of the building which is full of sediment from the facility falling apart. If the City does not | |

want to take responsibility for the storm water in this building, they need to remove all equipment and materials out of the armory. It may be necessary for the City to contact whoever is responsible for the facility and ask them to handle the building in whatever way seems feasible. In all cases the floor drain at the front of the facility will need to be capped if sediment and building materials continue to drain to the inlet.

Washing pad

The washing pad located in the maintenance yard has a catch basin that is connected to a tank for separating the grit from the wash water before sending the water to sanitary. During the inspection, a vehicle parked on the wash pad to wash a dump truck, and it was noted that all the wash water was not draining to just the one catch basin. Some of the wash water was discharging off the pad and draining to the adjacent catch basin down slope. This discharge was a result of the crews not pulling the vehicles on to the wash pad far enough to ensure all wash water is discharged to the proper catch basin. There was also evidence of mowers being washed off the pad. These incidences are most likely a lack of education on the reason the wash pad has been installed. The City should be training all employees not just to use the wash pad, but also why they are washing vehicles at this location verses next to any catch basin on site and where the water is draining.

Catch basins

Because there are stockpiles of topsoil, sands, C&DD, gravel, and fill material without sediment controls, e.g. tarps, roofs, containment, the City needs to provide inlet protection to the 2 catch basins in the maintenance yard that are connected to storm. More information can be found on the Cuyahoga Soil and Water Conservancy District website for storm water <http://www.cuyahogaswcd.org/services-stormwater.htm>, and more specifically on inlet protection at <http://www.cuyahogaswcd.org/PDFs/TechNote-Storm%20Drain%20Inlet%20Protection.pdf>.

Street Sweepings

At the end of the day, the sweepers will dump street debris at the service garage for pick up to the WWTP the next day. At this time, street sweepings are considered a solid waste and this practice is not acceptable. If taking the sweepings directly to the WWTP is not a feasible option, the City needs to start placing them in a contained area where there is no stormwater run-on or runoff. This could include temporarily placing the sweepings in a lidded dumpster at the service yard or even transferring the sweepings to a dump truck at the end of the day and taking the street spoils to the WWTP that day.

INSPECTION PHOTOS
Service Facility
City of Barberton
Photos Taken: June 24, 2010

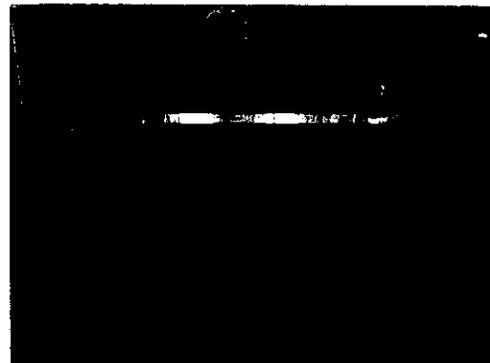


Fig 1: The floor drains in the equipment storage building lead to the City's MS4. The City needs to take extra precaution with the materials stored in this garage. Equipment and vehicles need to be inspected for leaks and drip pans should be placed under leaky equipment.

Fig 2: The tar distributor in the equipment storage building is parked directly over the storm drain. The City's options include but are not limited to capping the inlet if the second floor drain down slope will suffice for drainage, parking the distributor in another location with a pad to catch excess tar, or temporarily blocking the catch basin and still placing a pad to catch excess tar. In all cases the site need to be remediated and the inlet needs to be protected.

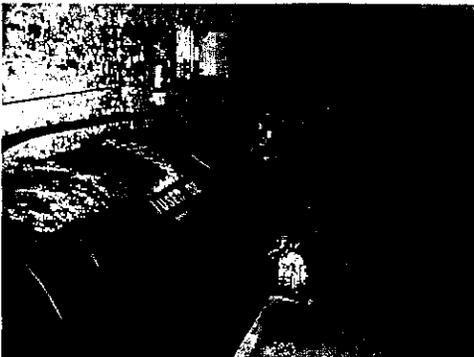


Fig 3: All drums and chemicals should be stored on secondary containment when the floor drains are connected to storm. The dike for the used oil tank should be cleaned out regularly and the wastewater disposed of properly.

Fig 4: If vehicles are leaking extensively they may not be suitable for driving on City roads. Also, it may be more beneficial for the City to use drip pans to dripping pads to prevent the extensive use of oil-dri.

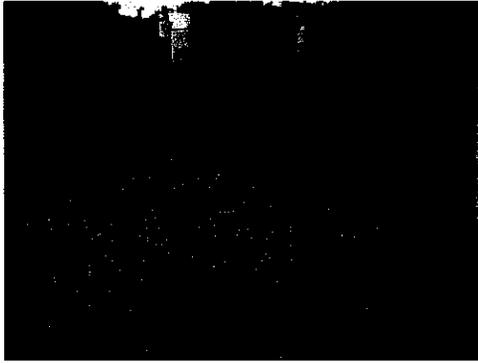


Fig 5: The City may want to have safety and spill procedures in place for the catch basin adjacent to the fueling station.



Fig 6: This part of the property is not owned by the City, but the City stores materials on this property. The City is responsible for the storm water on any of the property where they are storing materials and conducting municipal operations.

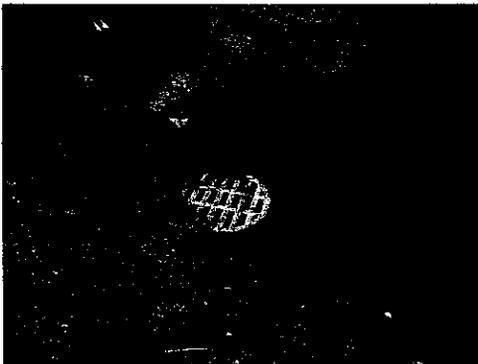


Fig 7: The front catch basin in the maintenance yard receives a lot of the runoff from the material stock piles in the yard. The basin needs some sort of inlet protection to keep sediment and grit out of the MS4. This basin also receives some of the wash water from the wash pad. This water needs to be directed to the wash pad catch basin only and kept out of this inlet. The City may want to consider tying this basin into sanitary as well.

Fig 8: The open storage of street sweepings on the maintenance yard is not acceptable. Please see notes above for information on this topic.

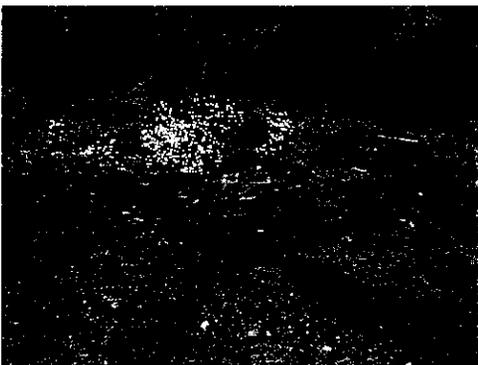


Fig 9: The catch basin at the rear of the facility receives the other half of the drainage from the maintenance yard. This basin needs inlet protection to prevent the discharge of sediment and grit to the City's MS4. See Notes.



Fig 10: Sand and topsoil piles should have some sort of sediment controls or cover. At the least, both piles should be tarped to avoid sediment laden stormwater runoff.



Fig 11: The back of the maintenance yard is vegetated and acts as a natural buffer for the C&DD and gravels lining the back.

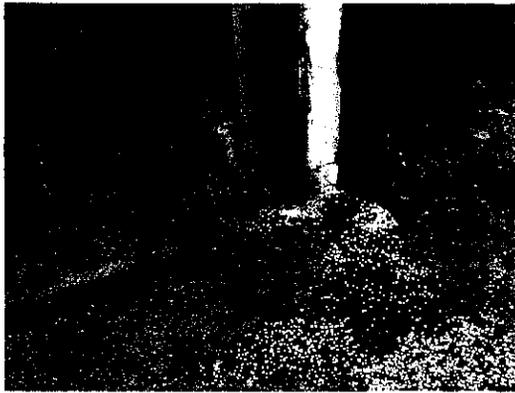


Fig 12: Keep all salt swept into the dome and away from contact with stormwater.



Fig 13: The Hydro Melt storage tank does not have secondary containment and the City should **include this area as a potential pollutant source in the SWP3.**

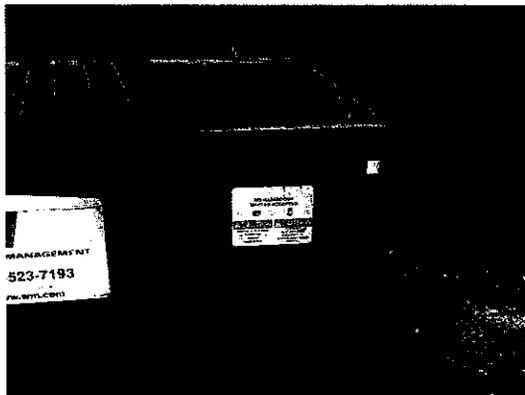


Fig 14: All solid waste dumpsters need to lidded, plugged and inspected for leaks on a regular basis.



Fig 15: Make sure the materials stored in the bins are contained in the designated area.

FIELD INSPECTION WORKSHEET

MS4 SWMP Evaluation

MS4 Maintenance Facility Field Inspection Worksheet

| | |
|--|--|
| Permittee: City of Barberton Distribution Garage (Utilities Department) | |
| Address of facility: 173 Water Street, Barberton 44203 | Size of facility: |
| Date of visit: 6/24/2010 | Time of visit: 3:40 p.m. |
| Provide the name(s) and title(s) of permittee staff present during inspection | |
| Name | Title |
| Alan Keltyka, P.E. | Stormwater Utility Manager |
| Evaluator Observations: | |
| SWPPP or stormwater plan | |
| Has the maintenance facility developed a SWPPP or stormwater plan? | NO. The City is required to develop a SWP3 for this facility similar to that of an Industrial SWP3. See Interview sheet for more information on this matter. |
| Does the plan include a site map, list of pollutant sources, BMPs, and maintenance procedures? | These are key components of the SWP3 and must be included in the document when it is produced. |
| Does the permittee conduct and document periodic inspections of the facility? | NO. The facility must be inspected for the implementation of storm water best management practices (BMPs) at a frequency specified in the SWP3. Ohio EPA recommends that the facility be inspected once per month. In addition, you must conduct a Comprehensive Site Evaluation annually. |
| Are storm drains labeled and free of debris? | NO. Storm drains are not labeled and not free of debris. Evidence of paint, sediment build-up, and oil sheens where all found in the catch basins at this facility. |
| Vehicle maintenance, fueling and washing | |
| Are vehicle maintenance activities conducted in a designated place not exposed to stormwater? | NO. Floor drains need to be evaluated in the older portion of the facility to determine whether they lead to sanitary or storm. Most likely the drains are connected to storm, in which case the City must implement stormwater BMPs to prevent the discharge of pollutants into the City's MS4. |
| Are fueling stations properly designed with spill kits nearby? | N/A. No fueling station at this location |
| Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer? | Vehicles are washed on-site in the newer building, where floor drains are all connected to sanitary. <i>If any other washing of vehicles or equipment occurs throughout the facility make sure it is stopped and directed to the newer building until the other floor drains have been evaluated.</i> |
| Material storage | |
| Are all materials that are potential stormwater contaminants stored under cover or in secondary containment? | The bedding sand stockpile, 304 piles, B19 piles, road-based material stockpiles stored at the back of the facility have no sediment controls to prevent the discharge of runoff to the adjacent canal. |

| | |
|--|---|
| | <p>The excavated material pile is pushed back into the canal.</p> <p>Move all tire storage inside or tarp the tires that cannot fit indoors.</p> |
| Hazardous waste management | |
| Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff? | <p>The used oil tank must be labeled "Used Oil."</p> <p>Full barrels, batteries, and open asphalt sealer containers are all stored on pallets on the side of the garage. All three materials are leaking hazardous material to the surrounding graveled area adjacent to the canal. This area needs to be remediated and these materials need to be stored inside in secondary containment.</p> |
| Waste management | |
| Are waste bins covered with waste properly disposed in containers? | All dumpsters on site need to be lidded, plugged, and inspected for leaks on a regular basis. |
| How is landscape waste stored? | Landscape waste is not stored at this facility. |
| Spill response | |
| Does the facility have a spill response plan, and are spill kits readily available? | A spill response plan is a required component of the SWP3. Spill kits were not readily evident at this site. Be sure to locate spill kits where they are most likely to be needed, e.g., the maintenance shop. |
| Employee training | |
| What type of stormwater training do maintenance staffs receive? | Training on storm water pollution prevention is required for the staff at this facility. Employees at this facility have not been trained at this time. |
| Notes or additional information: | |
| <p>The SWP3 for this facility still needs to be developed. Through the inspection it was evident that the crews at this facility are not trained on pollution prevention and are unaware of the City's stormwater program. Once a SWP3 has been developed, the crews need to be trained on the contents of the document as well as how to implement the BMPs the SWP3 lists. Please be sure to identify where all floor drains lead in all the buildings. Note any possible pollutant sources in the yard, e.g. drums, oil tank, sand and soil stockpiles, excavated material stockpile, dumpsters, indoor vehicle maintenance, etc. and explain the BMPs the City plans to implement to address these areas of concern.</p> | |

INSPECTION PHOTOS
Distribution Garage (Utilities)
City of Barberton
Photos Taken: June 24, 2010



Fig 1: At the side of the garage, there are leaking drums, used batteries, and open asphalt sealer buckets placed on a pallet and exposed to stormwater. The area under and around the pallet are drenched with pollutants that the City is not authorized to discharge from their site. This area needs to be remediated, and all storage of these materials should be under cover on secondary containment.

Fig 2: Top view of the open sealer bucket, old batteries and drums.



Fig 3: Mr. Keltyka was unsure of the substance that is in the tank above. None-the-less the tank is leaking and the City needs to investigate their options for removing the pollution source.

Fig 4: All drums should be stored under cover in secondary containment.



Fig 5 & 6: All tires should be tarped if they are going to continue to be stored outdoors.

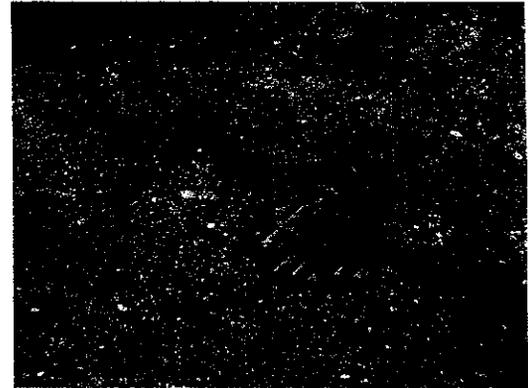


Fig 7: All waste dumpsters need to be lidded, plugged and inspected for leaks on a regular basis.

Fig 8: The catch basin at the back of the garage showed evidence of a yellow paint spill. The paint was noted on the yard leading up to the catch basin, on the grate, and inside the basin. The City should track where the outfall for this basin is and make sure the paint did not reach a waterway.



Fig 9: Excavated material has been pushed over the edge of the property into the adjacent canal. This must be stopped and the area should be cleaned up and all material removed from the canal and brought back onto the yard.



Fig 10: No sediment controls were provided to material stockpiles at the back of the facility.



Fig 11: Scrap metal should be scraped out on a more regular basis to avoid a large collection of rusty metals throughout the yard along the canal bank. If possible, tarp the scrap metal dumpster to keep stormwater out.

FIELD INSPECTION WORKSHEET

MS4 SWMP Evaluation

MS4 Maintenance Facility Field Inspection Worksheet

| | |
|--|---|
| Permittee: City of Barberton WWTP | |
| Address of facility: 5087 Van Buren Road, Barberton 44203 | Size of facility: |
| Date of visit: 6/24/2010 | Time of visit: 3:00 p.m. |
| Provide the name(s) and title(s) of permittee staff present during inspection | |
| Name | Title |
| <i>Alan Keltyska, P.E.</i> | <i>Stormwater Utility Manager</i> |
| Evaluator Observations: | |
| SWPPP or stormwater plan | |
| Has the maintenance facility developed a SWPPP or stormwater plan? | N/A. The facility has applied for no exposure certification. All drains at the facility, indoors and outdoors, are directed back to the plant. |
| Does the plan include a site map, list of pollutant sources, BMPs, and maintenance procedures? | N/A. So SWP3 is required for this facility. |
| Does the permittee conduct and document periodic inspections of the facility? | N/A. No stormwater inspection is necessary for this facility. |
| Are storm drains labeled and free of debris? | All drains are connected back to the WWTP indoors and outdoors. |
| Vehicle maintenance, fueling and washing | |
| Are vehicle maintenance activities conducted in a designated place not exposed to stormwater? | Yes. Vehicle maintenance occurs indoors where floor drains are connected back to the plant. |
| Are fueling stations properly designed with spill kits nearby? | N/A. |
| Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer? | N/A. All drains are directed back to the plant. |
| Material storage | |
| Are all materials that are potential stormwater contaminants stored under cover or in secondary containment? | The City's catch basin cleaning spoils dewatering pad is located at this facility. All drains are directed back to the plant. The dried material is then placed in a dumpster at the back of the facility for pick-up to a landfill. The dumpster for CB cleanings, a large street sweepings pile, screened street sweepings and other material piles are all stockpiled in the same location at the back of this facility. The City has dug a lagoon to collect runoff (leachate) from the entire area, and when excess runoff starts collecting in the lagoon, the City will pump the wastewater back up to the plant. At this time it seems all runoff has been contained at this location. |
| Hazardous waste management | |
| Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff? | N/A. |

| | |
|--|---|
| Waste management | |
| Are waste bins covered with waste properly disposed in containers? | N/A. |
| How is landscape waste stored? | N/A. |
| Spill response | |
| Does the facility have a spill response plan, and are spill kits readily available? | The facility has its own spill response plan unrelated to stormwater. |
| Employee training | |
| What type of stormwater training do maintenance staffs receive? | N/A. Does not fall under the MS4 program. |
| Notes or additional information: | |
| <p><u>Street Sweepings Beneficial Reuse</u></p> <p>The City of Barberton sends street sweeping spoils to the City's WWTP and dewateres the spoils before transferring them to the back, where they are stockpiled and landfilled as needed. This area is contained and all runoff is collected and circulated back to the plant when the lagoon reaches maximum capacity. The City would like to use street sweepings for beneficial reuse, but at this time, street sweepings are still considered a solid waste. The process the City is considering would involve screening the spoils to remove oversized waste and mixing the fines with EQ sewage sludge and composted material to create a usable material for reuse.</p> <p>The Division of Solid and Infectious Waste Management (DSIWM) does have an <i>Integrated Alternative Waste Management Program (IAWMP)</i> that may be used to approve alternative waste disposal projects in agreement with OAC rule 3745-27-05(A)(4). For additional information regarding the IAWMP, please contact Dave Dysel (330-963-1286 or via email at Dave.Dysle@epa.state.oh.us) of DSIWM or refer to the Alternative Waste Management Project Request Form (attached), which can also be obtained from the following website address: http://www.epa.ohio.gov/dsiwm/pages/forms.aspx. I have talked with Dave and he would be happy to help the City of Barberton evaluate whether this process would be viable with the beneficial reuse program and the IAWMP. The City should send in a letter to Dave Dysel, along with the form above, noting the amount of materials to be used and an explanation on how the City plans to reuse the materials and the process to do so.</p> | |

INSPECTION PHOTOS
Barberton WWTP
City of Barberton
Photos Taken: June 24, 2010



Fig 1: Catch basin dewatering pad has drains that are connected back to the plant. All catch basins at the facility are directed straight back to the plant, even so, try to keep all runoff from the spoils contained to the pad area.

Fig 2: The dumpster for dried catch basin spoils is located at the back of the WWTP in the area where all runoff is collected in the man-made ditch.



Fig 3: The screened street sweepings pile is located on the area where the runoff is collected.

Fig 4: Some unscreened street sweepings are still stockpiled at the facility in hopes that the City will be able to use the sweeping for beneficial reuse in the near future. The runoff is contained.



Fig 5: Leachate runoff from the piles of street sweepings and other material stockpiles in the storage area.

Fig 6: All the runoff and leachate from this storage area at the back of the facility is collected in a lagoon/ ditch that the City has dug for such purposes. When the ditch has more water than it can hold the WWTP staffs will pump the water out and run it back through the plant.

Alternative Waste Management Project Request

The Integrated Alternative Waste Management Program (IAWMP) is used to approve alternative waste disposal projects pursuant to OAC 3745-27-05(A)(4). Ohio EPA regulates the **disposal** of solid waste. Incorporation of appropriate waste material into the manufacture of a final product is not considered disposal, and therefore not regulated by the agency. Contact your district office for more information.

REQUESTOR INFORMATION

Name: _____ Company (If applicable): _____
 Street address: _____ City: _____ State: _____ Zip code: _____
 Phone: _____ Email: _____ Alternative contact person: _____

GENERATOR INFORMATION

Name: _____ Company (If applicable): _____
 Street address: _____ City: _____ State: _____ Zip code: _____
 Phone: _____ Email: _____ Alternative contact person: _____

If the generator is different than the requestor, attach generator's written consent to use the waste in this project. Also attach statement from generator describing efforts to minimize waste generation.

PROPERTY OWNER INFORMATION

Name: _____ Company (If applicable): _____
 Street address: _____ City: _____ State: _____ Zip code: _____
 Phone: _____ Email: _____ Alternative contact person: _____

If the property owner is different than the requestor, attach written consent of the property owner to dispose of solid waste at this location. List multiple property owners on a separate sheet.

WASTE CHARACTERIZATION

Non-toxic fly ash Non-toxic bottom ash Non-toxic, spent foundry sand Other

Other waste description: _____

Description of physical and chemical characteristics attached:

Material safety data sheets TCLP test results Lab reports Other

The generator shall attach a certification that the analysis is true, accurate and representative of the solid waste.

PROJECT INFORMATION

Project location: _____
 Describe proposed use of waste material in this project: _____

Attach contingency plan for disposal of any solid waste brought to project site that cannot be used.

Anticipated start date of construction: _____ Estimated completion date: _____

Describe use of waste in other IAWMP projects (if known): _____

Estimated volume of waste in this project: _____ Rate of disposal: _____

Method(s) of application for land application requests: _____

Attach plan drawing of the proposed limits for solid waste disposal.

CERTIFICATION

I have personally examined all information and attachments in this project request and all of the information submitted is true and accurate to the best of my knowledge.

Name: _____ Date: _____

Upon review of this request the Ohio EPA district office may require additional narratives, plan drawings, and/or detailed engineering plans. Examples include, but may not be limited to, the following information:

- A flow diagram and narrative describing the process producing the waste
- Location and limits of project site and all waste storage areas
(If this project is at a solid waste facility this could include plan view drawings identifying footprint of existing waste, proposed locations of waste placement in this project, and all waste storage areas)
- Hydrogeologic characterization
- Location and limits of regulatory floodplain
- Existing topography showing adjacent lakes, streams, wetlands, springs, or other surface waters
- Depth to the upper-most aquifer and lowest elevation of waste placement
- Aquifer boundaries declared by the U.S. government under the Safe Drinking Water Act to be a sole source aquifer
- Limits of any unconsolidated aquifer systems delineated on the Ohio Department of Natural Resources (ODNR) ground water resource maps as yielding at least 100 gallons per minute
- Ohio EPA endorsed wellhead protection area or any public or private water supply well
- Stormwater run-on/run-off control measures
- Total acreage of project site and boring logs for large volume land application projects
- A list of the permits, licenses, plan approvals, authorizations or other approvals that have been applied for and the local, state, or federal office where application has been made
- Location and boundaries of any natural areas listed below:
 - National parks or national recreation areas and state parks or state recreation areas;
 - Areas listed by ODNR as a state nature preserve, state wildlife area, or state scenic river;
 - Areas designated, owned, and managed by the Ohio Historical Society as a nature preserve;
 - Areas designated by the U.S. Department of Interior as a national wildlife refuge or national scenic river;
 - Areas designated by the U.S. Forest Service as a special interest area or a natural research area in the Wayne National Forest;
 - Stream segments designated by the Ohio EPA as a state resource water a coldwater habitat, or an exceptional warmwater habitat.

OHIO EPA DISTRICT OFFICES

| | | | | |
|--|--|---|---|--|
| Central District Office 3232 Alum Creek Drive Columbus, OH 43207 (614) 728-3778 | Northeast District Office 2110 E. Aurora Rd. Twinsburg, OH 44087 (330) 963-1200 | Northwest District Office 347 North Dunbridge Rd. Bowling Green, OH 43402 (419) 352-8461 | Southeast District Office 2195 Front Street Logan, OH 43138 (740) 385-8501 | Southwest District Office 401 East Fifth Street Dayton, OH 45402 (937) 285-6357 |
|--|--|---|---|--|

MORE INFORMATION ABOUT IAWMP

- www.epa.state.oh.us
- Document No. 0529 - Division of Solid and Infectious Waste Management - IAWMP - Division of Labor
- Document No. 0609 - Evaluating Exempt Waste Uses at Solid Waste Facilities
- Document No. 0630 - Issuing Exemptions from Collecting and Remitting the State Disposal Fee and SWMD Surcharges...

| FOR OHIO EPA USE ONLY | | | | | |
|--|--|------------|-----------|-------------------|------------------|
| Please route the IAWMP Project Request to the following Divisions. Each Division should note whether there are comments on the request, or if additional information is required (attach information requirements). The individual providing the lead review should be noted and all correspondence returned to that individual. | | | | | |
| Lead reviewer: | | | Division: | | |
| DSIWM | | No comment | | Comments attached | Need information |
| DSW | | No comment | | Comments attached | Need information |
| DDAGW | | No comment | | Comments attached | Need information |