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MEDINA

WADSWORTH

CITY OF WADSWORTH

3GQ00061 2009/07/23

MACPHERSON,
LINDSIE

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State of Ohio Environmental Protection Agency

Northeast District Office

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

July 23, 2009

RE: MEDINA
CITY OF WADSWORTH
MUNICIPAL STORM WATER PROGRAM
AUDIT FINDINGS

Mr. Josh E. Wolf
Storm Water Program Coordinator
City of Wadsworth
120 Maple Street
Wadsworth, OH 44281

Dear Mr. Wolf:

Ohio EPA has completed an audit for a portion of your municipal storm water program. Our audit primarily focused on the 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) 3GQ00061*BG and Ohio Administrative Code 3745-39.

On July 9, 2009, the Ohio EPA met with you and other representatives of the City of Wadsworth 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 Worksheets completed for your community. Please review these documents in detail to determine specific elements where your pollution prevention and good housekeeping program needs improvement. In addition, you will find comments suggesting ways to improve your MS4 program. The following is a summary of our audit findings:

Violations:

- **Failure to develop a Storm Water Pollution Prevention Plan (SWP3) for facilities that discharge storm water runoff associated with industrial activities.** This is a violation of Part IV of the City's Ohio EPA General Storm Water NPDES Permits for Industrial Activities #OHR000004. SWP3s must be developed for the WWTP and the Airport to be in compliance with the facilities' NPDES Permits for industrial activity. The SWP3s should be present on site at the facilities which generate the storm water discharge at all times.

Mr. Josh E. Wolf
City of Wadsworth
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- **Failure to implement an annual training program for maintenance and field staff in order to prevent and reduce storm water pollution.** This is a violation of Part III.B.6.b and III.B.6.e of the Ohio EPA General Storm Water NPDES Permit for Small MS4s #OHQ000002. Please be aware that the City is required to provide at least one training session each year on storm water BMPs to municipal staff whose job can affect compliance with the MS4 permit. The City responded that one training event had occurred, but the date and attendance was unknown and not documented.
- **Failure to prevent discharge of wastewater.** This is a violation of Part I.C.5 and Part III.B.6.d.iii.2 of the Ohio EPA General Storm Water NPDES Permit for Small MS4s #OHQ000002. Trucks are washed outside of the buildings as well as inside, where drains lead to the MS4, allowing wash water to enter storm drains. The City has no procedure or installation to properly collect wastewater from washing activities. They should either construct a designated wash bay as part of their Service Complex or contract with a local commercial vehicle washing company. Discharges of wastewater into the City's MS4 from operations at the Service Complex must cease.

Deficiencies:

- The City has not provided any storm water pollution prevention guidance materials to field staff that they can take out with them in the field. By making materials available to staff at the field level, implementation of storm water BMPs should improve.
- The city needs to assure contract language/agreements specify that storm water BMPs must be implemented by a third party, when said third party is relied upon to enact a BMP. Please be sure to add this language to any future requests for proposal or contracts you sign with third party service providers whose activities can create storm water pollution.
- The city is not permitted to discharge any sort of leachate or leafate; therefore, the staging area where the leaves are taken needs to be equipped with controls to contain runoff. One example discussed on site, was to use an earthen berm with some sort of impermeable clay to keep runoff from discharging off site. The berm should be seeded and placed along the contour lines of the area. Excess leachate can be pumped out with the vac truck when necessary and taken to the dump site at the WWTP.
- The City must coordinate all of the materials of their present SWP3s for each department and develop a site map indicating all drainage areas and pollutions

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

- The City, as indicated by the Department of Agriculture, is classified as a commercial applicator and as such needs to employ at least one licensed applicator who can then train other employees as long as records are maintained. This applicator can be no more than 2 hours away when products are applied, otherwise no application should occur.

Please review my comments and provide me with a letter of response indicating the actions you will take to address my concerns. **Your response should be received no later than August 17, 2009.** Please note that this response does not replace the requirement to submit an Annual Report. Your annual report for 2009 will be due on April 1, 2010.

If you have any questions, please contact me at (330) 963-1128 or via e-mail at Lindsie.MacPherson@epa.state.oh.us.

Sincerely,



Lindsie MacPherson
Assistant to the District Engineer
Division of Surface Water

LM/mt

cc: Robin L. Laubaugh, Mayor
Chris Easton, Director of Public Services

Municipal Storm Water Program Evaluation

MS4 Maintenance Component Worksheet

Date of Evaluation July 9, 2009	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.
Evaluator Name, Title Lindsie MacPherson, Ohio EPA Assistant to the District Engineer	
MS4 Permittee City of Wadsworth	

Staff Interviewed		
Name	Department/Agency	Phone Number/Email
Josh E. Wolf Civil/ Stormwater Engineer	City of Wadsworth	(330) 335-2751 jwolf@wadsworthcity.org
Thomas Tucker City Engineer	City of Wadsworth	(330) 335-2737 ttucker@wadsworthcity.org

MS4 Mapping		
Interview Questions	Response	
Outfalls and receiving waters mapped?	YES	
Catch basins?	YES	
Pipes, ditches, other conduits?	YES	
Public stormwater facilities (BMPs)?	YES	
Private stormwater facilities (BMPs)?	YES	
How are maps used (i.e. tracking illicit discharges)?	The City (street department) uses the map as a reference when inspecting the MS4 system for problems and illicit discharges.	
Applicable Documents		Reviewed
Map(s) of MS4 system		YES
		OBTAINED

Notes
<p>MS4 Mapping</p> <p>Mapping obligations under the NPDES Permit #OHQ000001 have been met. Employees in the engineering department used CADD to draw their storm sewer map. The City has also mapped catch basins, pipes and public/ private stormwater facilities in compliance with the requirements for the NPDES Permit #OHQ000002. Please note that the city needs to map open <i>ditches</i> as well to be in complete compliance with this permit.</p>

Notes

Illicit Discharge Detection

The City partners with the Medina County Health Department (MCHD) and the Medina County Sanitary Engineers (MCSE) to help prohibit illicit discharges. An illicit discharge complaint is sent to the Sanitary Engineer's office, where it is then investigated and dye tested to pinpoint the source. Once the source is found the MCSE office presses the responsible party to complete corrective actions. The MCHD is responsible for complaints with the home sewage treatment systems (HSTS) and has a timeframe for corrective action.

The city also logs all storm water complaints on a CADD map to better organize and prioritize their maintenance and repairing. This is a good practice to better streamline the cities maintenance work and allows the city to look at water quality as a prioritizing measure.

Please be aware that NPDES permit #OHQ000002 requires the City of Wadsworth to perform dry weather screening at all outfalls 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 illicit discharges from residential septic systems, please read Part III.B.3.e of the Ohio EPA General Storm Water NPDES Permit for Small MS4s #OHQ000002 for expectations to address these sources.

Catch Basin Cleaning			
Interview Question		Response	
Schedule established for inspections and cleaning?		<p align="center">YES</p> The city has a program for the annual inspection of all catch basins. Cleaning is carried out as needed by inspection.	
Is cleaning and maintenance of catch basins tracked:		<p align="center">YES</p> The street department keeps a daily log of the catch basins inspected and the maintenance needed on a spreadsheet of all the catch basins.	
How are spoils materials disposed of?		<p align="center">See Notes.</p>	
Are storm drain pipes inspected? Proactive or only in response to blockage event?		<p align="center">YES</p> The City inspects storm drain pipes on an as needed basis in response to a problem or complaint. They are waiting for the funds to buy a camera system as soon as 2010, and hope this will start the movement toward a <i>storm drain inspection program to detect illicit discharges</i> .	
Applicable Documents		Reviewed	Obtained
List of active municipal construction projects		NO	NO

Notes

Catch Basin Cleaning

Specific street department employees are responsible for the inspection and maintenance of the city's catch basins. An annual inspection and cleaning program has been established, where the basins are

inspected for problems and cleaned or repaired as needed. The workers keep a log on a computerized spread sheet of all the catch basins inspected, noting any maintenance completed. The spread sheet lists every catch basin in the city to better help the workers inspect all the basins in a year.

Disposal of Catch Basin Cleanings:

The crew uses a vac truck to clean the basins. The spoils are taken to a designated, concrete dump site at the WWTP for secondary treatment. Once the spoils have been dewatered, they are swept up and placed in the dumpster next to the dewatering pit. The dumpster is emptied once a week or more if needed.

Municipal Construction Projects:

The city has no projects at this time that require a NPDES construction general permit (CGP). All the projects are small routine road maintenance activities and involve the disturbance of less than five acres of land.

Stormwater Management Facilities Operation and Maintenance		
Interview Questions	Response	
Public facilities inspected?	YES	
Frequency:	See Notes.	
Private facilities inspected?	YES	
Frequency:	See Notes.	
Checklist used for inspections?	YES The checklist was taken from an online example and retrofitted to better fit the City of Wadsworth.	
Have maintenance standards and procedures been established for these facilities?	YES The city has developed a detention basin maintenance agreement which highlights all standards and procedures. An example of this agreement was obtained by the EPA.	
How is maintenance prioritized? Is data evaluated to target maintenance resources?	YES The city has started to look at prioritizing repair of the facilities.	
	Applicable Documents	Reviewed Obtained
Inspection checklist		YES YES

Notes
<p>Public and Private Stormwater Facilities and Long-term Maintenance</p> <p>The city has a list of all public and private detention basins that treat for water quantity as well as those that treat water quality. They are looking into redesigning some of the older facilities for water quality. Employees of the engineering department complete inspections of all the public and private facilities every two years. A checklist is used for the inspections and any maintenance the facilities require is noted. The city takes responsibility for all maintenance of the city owned facilities, as well as the larger repairs of those privately owned. A letter is sent to the responsible party of the facilities, noting any maintenance that is needed. New owners sign a maintenance agreement, where they agree to maintain the basins following a set of standards.</p>

The engineering department may want to consider adding a ***water surface elevation box*** to the checklist to ensure the basin is operating and draining properly. The city also needs to assure that all post-construction BMPs are included in the long-term maintenance program to assure they remain effective in perpetuity.

Road Maintenance	
Interview Questions	Response
<p>Streets regularly swept?</p> <p>Frequency:</p>	<p style="text-align: center;">YES</p> <p>The city contracts sweeping out to Buckeye Sweeping. The sweeping is done in 5 cycles, beginning in April and ending in September.</p>
<p>Frequency based on water quality factors (e.g. proximity to streams)?</p>	<p style="text-align: center;">YES</p> <p>High traffic and industrial areas are swept more often for water quality.</p>
<p>How are spoils disposed of?</p>	<p>In the contract between the City and Buckeye Sweeping, the city requires the company to dispose of the spoils in the proper manner. The spoils are taken to a dumpster at the Service Garage area, which is taken to the landfill as needed.</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>The city has its own animal control warden. The carcasses are bagged and taken to the Medina County Central Processing Facility, which is a registered class II 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 street crews start leaf collection in the fall until all leaves are picked up. The leaves are stored in a staging area off of State Rd. until there is enough to take to the Smith Bros Composting Facility. The pile is taken away approximately 3 times per season or once a month.</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 style="text-align: center;">YES</p> <p>The city conducts projects such as concrete replacement, crack sealing, pipe replacement, catch basin rebuilding, slab repair and line painting.</p> <p>For bigger projects the city uses dandy bags for inlet protection. For smaller projects, the city should still be implementing BMPs. When cutting concrete, the slurry should not be rinsed down the drain. Instead, the slurry should be sucked up with the vac truck or dried and swept up after task.</p>

Road Maintenance			
Interview Questions		Response	
BMP guidance available to field staff?		<p align="center">NO</p> <p>The city could look at turning BMP information into a booklet or flip chart for the crews.</p>	
Deicers used by MS4?		<p align="center">YES</p> <p>The city uses beet juice along with their road salt. When temperatures are extremely low, liquid calcium chloride is used. The city will also combine cinders with their salt to stretch out the supply.</p>	
Type and amount of deicer and additives tracked?		<p align="center">YES</p> <p>The street crews keep a log of each truck that goes out, logging the miles plowed, miles salted, tons of salt plus any additives, and the route taken.</p>	
What measures are being taken to minimize the application of deicers?		<p>The city has developed a snow and ice control policy. The policy sets specific salting routes with primary and secondary paths, limiting the number of streets salted.</p>	
Sand/salt swept up after application?		<p align="center">YES</p>	
How soon?		<p>Salt is stored in a dome at the service complex, where salt is swept back into dome after each snow event.</p>	
Applicable Documents		Reviewed	Obtained
BMP guidance		NO	NO
Street sweeping records		YES	NO
Deicer application records		YES	YES

Notes
<p>Street Sweeping</p> <p>The contract between Buckeye Sweeping and the City highlights all the BMPs the company follows as well as the plan the company utilizes to sweep Wadsworth's streets. Buckeye Sweeping sweeps 11 of the city's curbed streets on a weekly basis, and 118 of the city's curbed streets 5 times a year, once per cycle. They track the road mileage swept as well as the amount of debris they dispose in the dumpster. These records are then sent to the City for payment.</p>
<p>Leaf Collection Operations</p> <p>The city is not permitted to discharge any sort of leachate or leafate; therefore, the staging area where the leaves are taken needs to be equipped with controls to contain runoff. See notes in Facilities Operation & Maintenance for more information on this topic.</p>
<p>Road Deicing</p> <p>When tracking deicer usage, the city should work on taking the slips used for each truck load and compiling the data into a spreadsheet. This will allow the city to better track their salt usage and set goals for a target reduction of deicer per snow event. The city also needs to have an end summary of salt and other additives used during each winter season. This information is required by the new Annual Report form.</p>

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

Notes
<p>Flood Management Structures: The city has an inventory of all their flood management structures. Some of the basins are designed for water quality but most of the structures are for water quantity. All new flood management structures are designed for water quality as well. When basins are rebuilt or repaired the city considers retrofit opportunities.</p>

Facilities Operation & Maintenance																					
Interview Questions	Response																				
Inventory of MS4 facilities complete (i.e. facilities owned and operated by the MS4)?	YES A list was provided of all facilities owned by the city.																				
<p>Types of facilities included <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: _____ • Solid Waste Transfer Stations • Composting Operations <ul style="list-style-type: none"> ✓ No discharge of leachate permitted • Airports • Shipping Ports • Steam Electric Power Plants • Wastewater Treatment Plants \geq 1 MGD <p><i>These do not need their own permit:</i></p> <ul style="list-style-type: none"> • Impound Lots • Leaf Collection Yards <ul style="list-style-type: none"> ✓ No discharge of leafate permitted 	<table border="1"> <thead> <tr> <th>Response</th> <th>SWP3 Developed?</th> </tr> </thead> <tbody> <tr> <td>NO</td> <td>N/A since do not operate</td> </tr> <tr> <td>YES</td> <td>NO. To be included in maintenance facility SWP3.</td> </tr> <tr> <td>NO</td> <td>N/A since do not operate</td> </tr> <tr> <td>YES</td> <td>NO</td> </tr> <tr> <td>NO</td> <td>N/A since do not operate</td> </tr> <tr> <td>NO</td> <td>N/A since do not operate</td> </tr> <tr> <td>YES</td> <td>NO</td> </tr> <tr> <td>NO</td> <td>N/A since do not operate</td> </tr> <tr> <td>YES</td> <td>N/A</td> </tr> </tbody> </table>	Response	SWP3 Developed?	NO	N/A since do not operate	YES	NO. To be included in maintenance facility SWP3.	NO	N/A since do not operate	YES	NO	NO	N/A since do not operate	NO	N/A since do not operate	YES	NO	NO	N/A since do not operate	YES	N/A
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Facilities Operation & Maintenance		
Interview Questions	Response	
	<u>Response</u>	<u>SWP3 Developed?</u>
<ul style="list-style-type: none"> • Maintenance Yards <ul style="list-style-type: none"> ➤ How many do they operate? <u> 1 </u> ➤ List facility names/locations: 311 Broad St., Wadsworth, OH • Parks <ul style="list-style-type: none"> ➤ How many in UA? <u> 15 </u> ➤ List facility names/locations: 1 cemetery and 14 parks List Provided to EPA. See file. • Parking Lots <ul style="list-style-type: none"> ➤ How many do they operate? <u> 7 </u> ➤ List facility name/locations: List Provided to EPA. See file. • Bus Terminals • Vehicle Maintenance Garages <ul style="list-style-type: none"> ➤ How many do they operate? ➤ List facility name/locations: 311 Broad St., Wadsworth, OH 	<p>YES</p> <p>YES</p> <p>YES</p> <p>YES</p> <p>NO</p> <p>YES</p>	<p>YES</p> <p>N/A</p> <p>N/A</p> <p>N/A since do not operate</p> <p>YES. Included in maintenance facility SWP3.</p>
Facilities inspected?	YES	
Frequency:	The city has set up a full annual inspection program for the maintenance and storage area at 311 Broad Street. The program is modeled off of the SWP3 Avon Lake developed. Each department at the facility is responsible for the annual inspection of their facilities. The city should be sure to include the “staging area” as part of the street department’s responsibility in the SWP3 for 311 Broad St.	
Checklist used?	YES A checklist has been retrofitted for each department at the Service Complex. The departments are responsible for completing a full inspection with the checklist every year and sending the reports to Josh Wolf.	
Staff which perform the inspections (department or agency):	Supervisors of Departments	
Is there a designated stormwater contact person for each facility?	YES Supervisors of Departments	

Facilities Operation & Maintenance		
Interview Questions	Response	
Describe enforcement procedures used to address noncompliance on a MS4-owner facility, i.e., what disciplinary measures are taken against those that do not implement standard operating procedures?:	<p>A handbook that outlines the disciplinary process is supplied to all workers upon hiring. The process includes verbal warnings, written warnings, and time off.</p> <p>This system has not been carried out for any issue concerning stormwater or other environmental compliance issue.</p>	
<p>Parking lots owned/operated by the permittee swept?</p> <p>Frequency?</p>	YES	
	Buckeye Sweeping sweeps the city's parking lots twice a year.	
<p>Do you have any combined sewer systems?</p> <p>If yes, do you have any combined sewer overflows?</p> <ul style="list-style-type: none"> ➤ How many? _____ ➤ Do you track frequency and volume? <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>	NO	
	NO	
	NO	
	There were 2 cross connections found a few years ago, but they were corrected immediately.	
	Illicit discharge elimination for cross connections is carried out on a complaint basis.	
<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>	NO	
	There has been no proactive testing of storm sewers to investigate infiltration and inflow into the MS4.	
Sewer spill and cleanup procedures in place?	YES	
	The city has procedures in place for responding to overflows and other spills throughout the city.	
Applicable Documents	Reviewed	Obtained
Facility inventory	YES	YES
Facility SWPPP	YES	YES

Notes

Facility Inventory

The City is in violation of their NPDES permits for the airport and WWTP for failure to develop and implement Storm Water Pollution Prevention Plans (SWP3s) for facilities that discharge storm water runoff associated with industrial activity. To be in compliance with their Ohio EPA General Storm Water NPDES Permit for Industrial Activities #OHR000004 the city must develop a SWP3 for the following facilities:

Wadsworth Municipal Airport
840 Airport Dr.
Wadsworth, OH

Wadsworth WWTP
1015 Airport Dr.
Wadsworth, OH

These SWP3s must be developed to be in compliance with the facilities' NPDES Permits for industrial activity. The SWP3s should be present on-site at the facilities which generate the storm water discharge at all times.

Also the city needs to make sure a spill kit is present and in close proximity to the fueling station at the Wadsworth Municipal Airport.

Leaf Collection Yard

The city is not permitted to discharge any sort of leachate or leafate; therefore, the staging area where the leaves are taken needs to be equipped with controls to contain runoff. One example discussed on site, was to use an earthen berm with some sort of impermeable clay to keep runoff from discharging off site. The berm should be seeded and placed along the contour lines of the area. Excess leachate can be pumped out with the vac truck when necessary and taken to the dump site at the WWTP. Any disturbed areas at the staging area should be reseeded and all stockpiles of potential pollutants, such as cinders, should be removed from the site.

Service Complex

Although an individual NPDES permit for storm water associated with industrial activity is not required for maintenance yards, the Ohio EPA General Storm Water NPDES Permit for Small MS4s #OHQ000002 requires you to develop an SWP3 for the following facility:

Wadsworth Service Complex
311 Broad Street
Wadsworth, OH

The City of Wadsworth has already developed a SWP3 for each department (Street, Water, Parks, and Communications) at the service complex, identifying a facility contact person, a facility inventory, a list of BMPs and potential pollutants, a spill response plan, and an inspection checklist. The next step for the city will be to coordinate all these materials into a SWP3 for the entire facility at 311 Broad Street and develop a site map indicating all drainage areas and pollution sources. 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 this **site map**. The SWP3 must be developed and implemented within 2 years, i.e., by June 2011.

Pesticides, Herbicides & Fertilizers

Notes			
Interview Questions	Response		
Certified applicators used?	NO		
Integrated Pest Management (IPM) practices used?	NO		
Storage location of pesticides, herbicides, and fertilizers:	All pesticides, herbicides and fertilizers are stored on a pallet in the parks department building. Chemicals are purchased as needed to avoid bulk storage.		
BMPs used during application:	Fertilizers are blown back on the lawn and away from paved surfaces. Also the application crews look at weather conditions before applying fertilizers.		
Fertilizer/pesticide application plan utilized?	NO Fertilizers are applied as needed and not often.		
Applicable Documents		Reviewed	Obtained
Fertilizer/pesticide application plan		NO	NO

Notes
Products such as Prosecutor, Weed & Feed, and copper sulfate are applied and tracked through an application log. The city tracks the date the product was applied, the type and amount used, as well as the place and time it was applied. The City, as indicated by the Department of Agriculture, is classified as a commercial applicator and as such needs to employ at least one licensed applicator who can then train other employees as long as records are maintained. This applicator can be no more than 2 hours away when products are applied, otherwise no application should occur.

Standards, BMPs, & Outreach			
Interview Questions	Response		
BMP technical guidance document available to maintenance staff?	NO		
MS4 use contractual staff to complete MS4 maintenance activities?	YES		
BMP guidance materials provided to contracted staff?	YES		
Requirement to consider stormwater impacts and utilize appropriate BMPs in contracts?	YES		
Materials used to educate the public regarding stormwater impacts on MS4 property (if applicable, i.e. public spaces):	<p>Pet waste: Information of the proper disposal of pet waste is provided in handouts for the community. There are no pet waste stations but the city may want to consider this form of public outreach.</p> <p>Litter reduction: No specific information has been handed out addressing litter reduction.</p>		
Applicable Documents		Reviewed	Obtained
BMP manual or guidance document		NO	NO
Contract language for MS4 operation and maintenance activities		NO	NO

Notes
<p>Contracted Services and Guidance</p> <p>The city contracts out all asphalt paving, chip and seal, large sink hole repairs and any large scale projects. The city requires the submittal of a SWP3 with any project contracted out. They require the contractors to use dandy bags and other sediment controls and stormwater quality BMPs.</p> <p>It is the city's obligation to assure contract language/agreements specify that storm water BMPs must be implemented by the third party. Please be sure to add this language to any future requests for proposal or contracts you sign with third party service providers whose activities can create storm water pollution. Periodic inspection of their operations in your community is also suggested.</p>

Staff Education and Training			
Interview Questions	Response		
<p>Staff trained to identify potential storm water pollution sources which would result in an illicit discharge?</p> <p>Frequency:</p>	<p>YES</p> <p>In March of 2004, the department supervisors were all educated on the NPDES regulations and the on the City of Wadsworth's SWMP.</p> <p>Also a member from each department was sent to a good housekeeping seminar by the Ohio EPA but the date and attendance is not documented.</p> <p>The city needs to implement an annual training program for the NPDES Permit #OHQ000002.</p>		
<p>Materials used to train staff:</p>	<p>None supplied.</p>		
Applicable Documents	Reviewed	Obtained	
<p>Training materials</p>	<p>NO</p>	<p>NO</p>	

Notes
<p>The Ohio EPA General Stormwater NPDES Permit #OHQ000002 requires the City of Wadsworth to train maintenance and other field staff on storm water pollution prevention at least once every year. Please begin documenting the training events provided and staff being trained.</p> <p>Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) as well as ODOT's Local Technical Assistance Program (LTAP) have provided a number of training opportunities on pollution prevention and good housekeeping for municipal operations over the past several years. Materials presented at OCAPP's session are archived on the internet at: www.epa.state.oh.us/ocapp/storm_water.html and can be used to provide training to your staff. In addition, the Cuyahoga County Board of Health (CCBH) through the NE Ohio Storm Water Training Council is planning several pollution prevention workshops this August. Please contact Laura Travers at (216) 201-2001 at the CCBH for further information. The Center for Watershed Protection also has information available for training in their Manual #9: Municipal Pollution Prevention/Good Housekeeping Practices.</p>

**MS4 SWMP Evaluation
MS4 Maintenance Facility Field Inspection Worksheet**

Permittee: City of Wadsworth	
Address of facility: 311 Broad St., Wadsworth, OH Service Complex	Size of facility: 20 Acres
Date of visit: July 9, 2009	Time of visit: 2:45 p.m.
Provide the name(s) and title(s) of permittee staff present during inspection	
Name	Title
Josh E. Wolf	Civil/ Stormwater Engineer
Thomas Tucker	City Engineer
Evaluator Observations:	
SWPPP or stormwater plan	
Has the maintenance facility developed a SWPPP or stormwater plan?	YES. Plan developed for each department of this facility. Materials should be coordinated to form an overall SWP3 for the site.
Does the plan include a site map, list of pollutant sources, BMPs, and maintenance procedures?	The city needs to develop a site map with all the requirements as noted in the Ohio EPA General Storm Water NPDES Permit for Industrial Activities #OHR000004 Part IV. D.2.a.1.
Does the permittee conduct and document periodic inspections of the facility?	Yes a program has been established for the annual inspection of each of the departments at 311 Broad St. The City may want to consider a bi-annual inspection as well.
Are storm drains labeled and free of debris?	Yes. Grates are stamped with message but measures could be taken to better maintain and protect the catch basins on-site.
Vehicle maintenance, fueling and washing	
Are vehicle maintenance activities conducted in a designated place not exposed to stormwater?	All vehicle maintenance is sent to the maintenance building, where floor drains are connected to the MS4. Because drains are not connected to the sanitary system, workers need to be very attentive of spill response procedures.
Are fueling stations properly designed with spill kits nearby?	The fueling station is equipped with a spill kit, an emergency shut off bottom and break away hoses.
Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer?	Yes vehicles are either washed outside or inside where the drains are directly connected to the MS4. Both practices are not acceptable.
Material storage	
Are all materials that are potential stormwater contaminants stored under cover or in secondary containment?	The facility should be cleared of all unnecessary scrap. Also stockpiles should be equipped with storm water runoff controls, and piles of unused material should be disposed of.
Hazardous waste management	
Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff?	All drums throughout the department buildings need to be stored undercover in secondary containment. Also used oil drums need to be <i>clearly</i> labeled "Used Oil."
Waste management	
Are waste bins covered with waste properly disposed in containers?	All dumpsters need to be equipped with lids and regularly inspected for leaks.
How is landscape waste stored?	Grass clippings are mulched and not stored.

Spill response	
Does the facility have a spill response plan, and are spill kits readily available?	The City has a written spill response plan for each department at the Service Complex. The facility needs to make sure spill kits are present, clearly labeled and assessable for each building.
Employee training	
What type of stormwater training does maintenance staff receive?	See Interview.
Notes or additional information:	
<p><u>Vehicle Washing</u> All of the buildings at the Service Complex on 311 Broad street are connected to the storm sewer system. Therefore, the washing of vehicles inside the buildings and outdoors is deemed unacceptable due to the pollutants wash runoff contains, which are not permitted to enter the City's MS4. The Ohio EPA strongly recommends connecting all floor drains where vehicle maintenance and washing occurs to the sanitary system. If this is not a possibility the city will need to outsource vehicle washing or build a wash bay, connected to sanitary, as a designated area for the facility's vehicle washing.</p>	
<p><u>Spill kits and Secondary Containment</u> Each department (Street, Water, Parks, and Communications) is required to equip each of its building with a spill kit, which needs to be clearly labeled and easily assessable. The same is true for hazardous waste drums. All drums need to be stored indoors on secondary containment.</p>	
<p><u>Parks Department</u> The parks dept. does not store fertilizer and weed killer in bulk. The chemicals are purchased as needed, and the small containers are stored in a designated area not exposed to stormwater. Any rinsing of mowers should be done in a grassy area away from storm drains and waterways.</p>	
<p><u>Waste Transfer Station</u> The transfer station is equipped with 7 trucks: 4 stored inside the building and 3 outside. The facility needs to maintain its vehicles and make sure all BMPs are practiced to prevent the vehicles from becoming a source of pollution. The transfer station is emptied at least once a day, if not more, and wastes are taken to the Medina County Central Processing Facility.</p>	

City of Wadsworth MS4 Program Audit

Municipal Operation Photos

Service Complex

Location: 311 Broad St.
Date Photos Taken: July 9, 2009
Taken by: Ken Safranek, DSW-NEDO

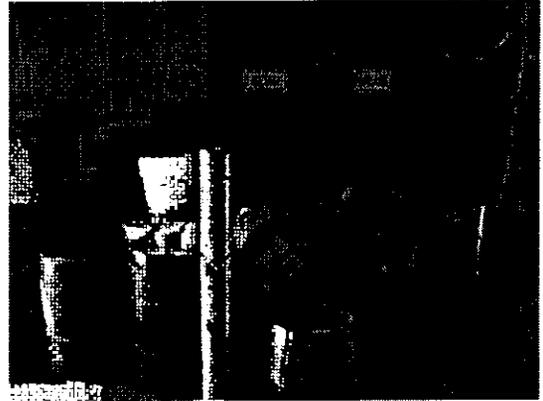
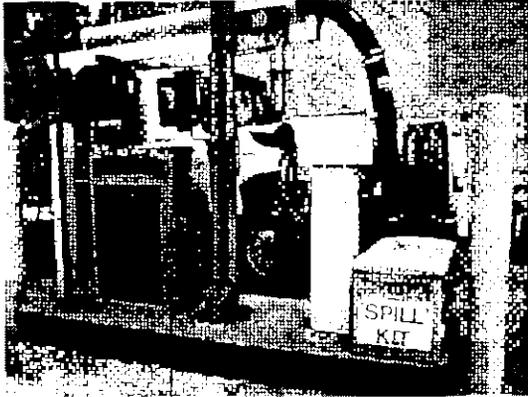


Fig 1(LEFT): Wadsworth service fueling station, equipped with spill kit, emergency shut off and break away hoses.

Fig 2(RIGHT): All drums require secondary containment.



Fig 3(LEFT): A good example of a drum stored on a secondary containment pad.

Fig 4(RIGHT): More drums with spill buckets, but secondary containment pads for the entire drums would be preferred.

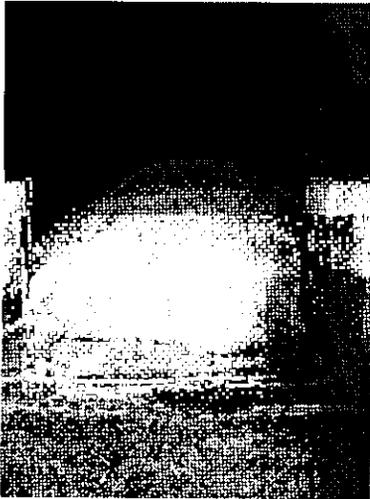


Fig 5(LEFT): The salt is stored in a dome near the back of the service complex. Please note that all spilled salt needs to be swept back up and pushed undercover to avoid runoff.



Fig 6(RIGHT): The salt residue on the right side of the salt dome needs to be cleaned up and the spoils should be disposed of as a solid waste. Inlet protection was provided for the catch basin behind the dome.



Fig 7(LEFT): Piles of potential pollutants need to be removed from the area and disposed of properly. This particular site is in the rear of the Complex, directly adjacent to a stream on the right.



Fig 8(RIGHT): A different view of the same area as mentioned in figure 7. Scrap and stockpiles need to be removed from this area and properly disposed of or stored in a different place.

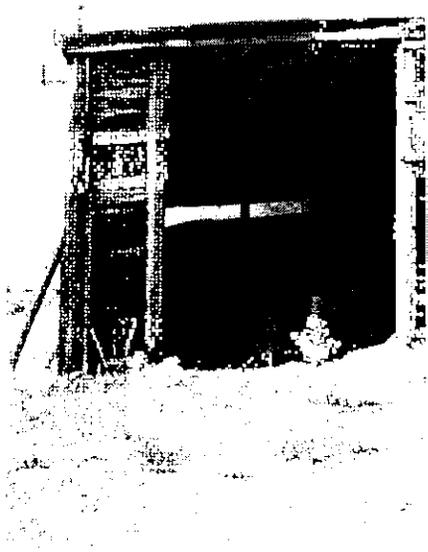


Fig 9(LEFT): The pile of cinders may need to be tarped to avoid runoff. Also, the stockpile at the staging area should be moved to this site.

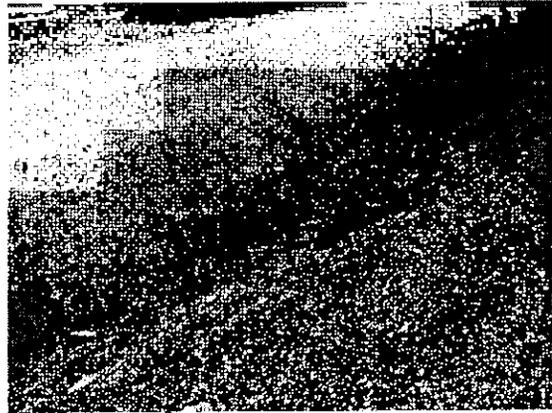


Fig 10(RIGHT): The catch basin adjacent to the cinder pile should be equipped with some sort of inlet protection.

**MS4 SWMP Evaluation
MS4 Maintenance Facility Field Inspection Worksheet**

Permittee: City of Wadsworth	
Address of facility: Off State Rd., Wadsworth, OH Staging Area (Leaf Collection Yard)	Size of facility: 12 Acres
Date of visit: July 9, 2009	Time of visit: 2:15 p.m.
Provide the name(s) and title(s) of permittee staff present during inspection	
Name	Title
Josh E. Wolf	Civil/ Stormwater Engineer
Thomas Tucker	City Engineer
Evaluator Observations:	
SWPPP or stormwater plan	
Has the maintenance facility developed a SWPPP or stormwater plan?	NO. A SWP3 is not required for this facility.
Does the plan include a site map, list of pollutant sources, BMPs, and maintenance procedures?	N/A
Does the permittee conduct and document periodic inspections of the facility?	There are no formal inspections for stormwater BMPs.
Are storm drains labeled and free of debris?	No storm drains on site.
Vehicle maintenance, fueling and washing	
Are vehicle maintenance activities conducted in a designated place not exposed to stormwater?	NO vehicle maintenance activities are conducted on site.
Are fueling stations properly designed with spill kits nearby?	No fueling station.
Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer?	NO
Material storage	
Are all materials that are potential stormwater contaminants stored under cover or in secondary containment?	Stockpiles of gravel and fines need to be cleared off the edges of the site and properly stored with controls, preferably off site. The cinder and slag piles need to be removed from the site as well.
Hazardous waste management	
Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff?	Whisman Tree Service stores some of their equipment on site. There were 5 gallon buckets still full of liquid stored outside. The city needs to make sure the Whisman Tree Service employees store their materials inside their trucks.
Waste management	
Are waste bins covered with waste properly disposed in containers?	No waste bins are on site.
How is landscape waste stored?	None produced.
Spill response	
Does the facility have a spill response plan, and are spill kits readily available?	N/A.
Employee training	
What type of stormwater training does maintenance staff receive?	See interview.

Notes or additional information:

Leaf Collection Yard

The city is not permitted to discharge any sort of leachate or leafate; therefore, the staging area where the leaves are taken needs to be equipped with controls to contain runoff. On example discussed on site, was to use an earthen berm with some sort of impermeable clay to keep runoff from discharging off site. The berm should be seeded and placed along the contour lines of the area. Excess leachate can be pumped out with the vac truck when necessary and taken to the dump site at the WWTP. Any disturbed areas at the staging area should be reseeded and all stockpiles of potential pollutants, such as cinders, should be removed from the site.

Material Storage

The city uses the majority of the staging area to store concrete debris from slab repairs and other projects. Once enough concrete is acquired the city will crush and recycle their stock. The city should be sure to keep the pile free from debris and scrap metal.

Whisman Tree Service

The city should have procedures in place for the Tree Service to remove the City's brush pile at least once a month.

**MS4 SWMP Evaluation
MS4 Maintenance Facility Field Inspection Worksheet**

Permittee: City of Wadsworth	
Address of facility: 1015 Airport St., Wadsworth, OH Wadsworth WWTP	Size of facility: 11 Acres
Date of visit: July 9, 2009	Time of visit: 1:30 p.m.
Provide the name(s) and title(s) of permittee staff present during inspection	
Name	Title
Josh E. Wolf	Civil/ Stormwater Engineer
Evaluator Observations:	
SWPPP or stormwater plan	
Has the maintenance facility developed a SWPPP or stormwater plan?	NO. Facility needs to develop and implement their industrial SWP3.
Does the plan include a site map, list of pollutant sources, BMPs, and maintenance procedures?	Does not exist.
Does the permittee conduct and document periodic inspections of the facility?	No formal inspection of storm water BMPs.
Are storm drains labeled and free of debris?	All storm drains are labeled but some need to be cleaned.
Vehicle maintenance, fueling and washing	
Are vehicle maintenance activities conducted in a designated place not exposed to stormwater?	Yes vehicle maintenance is conducted in the maintenance garage, where all drains are connected to the plant.
Are fueling stations properly designed with spill kits nearby?	No fueling station on site. Be sure to have a spill kit inside the maintenance garage.
Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer?	Yes vehicles are washed inside the vehicle maintenance garage. Facility needs to be sure all wash runoff is contained inside building.
Material storage	
Are all materials that are potential stormwater contaminants stored under cover or in secondary containment?	No materials stored outside.
Hazardous waste management	
Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff?	The drums in the maintenance garage need to be placed on secondary containment.
Waste management	
Are waste bins covered with waste properly disposed in containers?	The dumpster next to the concrete dump site for the vac truck needs to be lidded.
How is landscape waste stored?	None produced.
Spill response	
Does the facility have a spill response plan, and are spill kits readily available?	Yes a spill response plan exists. A spill kit will need to be ordered for the vehicle maintenance garage.
Employee training	
What type of stormwater training does maintenance staff receive?	See interview.
Notes or additional information:	
Facility Industrial SWP3 The City is in violation of Part IV of the Ohio EPA General Storm Water NPDES Permit for Industrial Activities #OHR000004 for failure to develop a Storm Water Pollution Prevention Plan (SWP3) for the WWTP, which discharges storm water runoff associated with industrial activity. The SWP3 must be developed to be in	

compliance with the facility's NPDES Permits for industrial activity. The SWP3 should be present at the WWTP at all times.

Concrete Dump Site

The vac truck will dump catch basin cleanings into the dewatering pit, where the drain leads to the WWTP. Once spoils are free of moisture, they swept up and placed in the dumpster next to the pit. The dumpster is the emptied as necessary. Please note that the dumpster needs to be lidded.

City of Wadsworth MS4 Program Audit

Municipal Operation Photos

Wadsworth WWTP

Location: 1015 Airport Dr.
Date Photos Taken: July 9, 2009
Taken by: Ken Safranek

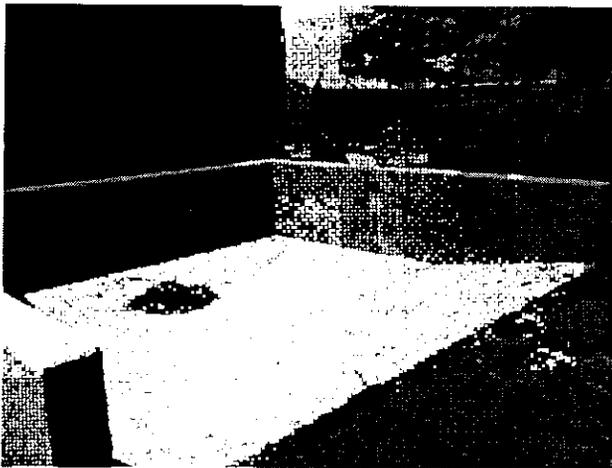


Fig 1(LEFT): The City's concrete dump site next to the WWTP. Drain leads to the WWTP. Dumpster for dried spoils can be seen in the back.