



3GQ0004820100716

STARK

EAST CANTON

VILLAGE OF EAST CANTON

3GQ00048 2010/07/16

MACPHERSON,
LINDSIE

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**Environmental
Protection Agency**

Tim Brown, Gov. Governor
Lee Fisher, Lt. Governor
Chris Koenig, Director

July 16, 2010

RE: STARK COUNTY
VILLAGE OF EAST CANTON
MS4 INSPECTION FINDINGS
MCM#6-POLLUTION PREVENTION
FOR MUNICIPAL OPERATIONS

Mr. Reginald McGee
Mayor
Village of East Canton
130 Cedar Street South
East Canton, OH 44730

Dear Mr. McGee:

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) 3GQ00048*BG and Ohio Administrative Code 3745-39.

On July 1, 2010, Ohio EPA met with representatives of the Village of East Canton to determine compliance with the NPDES permit and the Storm Water Management Plan (SWMP) submitted by the Village 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:

- **Open dumping of solid wastes at the Street Department Garage.** This is a violation of ORC 3734.03 and OAC 3745-27-05(C). The stockpiling of street sweepings by the Village is considered open dumping. These materials are solid wastes and must be managed as such. Measures must be taken to properly store and manage these solid wastes and associated leachate at the Service Garage. See comments in the attached worksheets for suggestions and recommendations.

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- **Failure to develop maintenance schedules, maintenance activities and long-term inspection procedures for the MS4.** This is a violation of Part III.B.6.d.iii.1 of the NPDES permit and ORC 6111.04 and 6111.07. The Village is obligated to ensure that public stormwater infrastructure is functioning properly and not causing storm water pollution. In order to do that, the Village needs to develop standard operating procedures for the MS4 including the adoption of maintenance standards, periodic inspection of MS4 infrastructure and performance of maintenance. The Village did indicate some maintenance activities are in place. See Notes in the *Stormwater Management Facilities Operation and Maintenance* section of the Municipal Storm Water Program Evaluation worksheet for information on how to improve your program.

- **Failure to provide controls for reducing or eliminating the discharge of pollutants from maintenance and storage yards at the Street Department Garage.** This is a violation of Part III.B.6.d.iii.2 of the Small MS4 NPDES Permit #OHQ000002 and Ohio Revised Code (ORC) 6111.04 and 6111.07. This violation was noted for the following operations at maintenance and storage yards:
 - Failure to provide containment for the small stockpile of street sweepings. Refer to the Maintenance Facility Field Inspection Worksheet for the Streets Garage for more information.
 - Failure to implement an inspection and maintenance program for dumpsters to prevent leachate from entering the MS4. Please be sure plugs are in dumpsters at all times.
 - Failure to implement sediment controls for material stockpiles, e.g. sand, grit, water break material piles throughout the service yard.

The MS4 permit does not authorize the Village 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, and plugged dumpsters achieves this goal. Please review the comments within the attached *Municipal Storm Water Program Evaluation and Maintenance Facility Field Inspection Worksheets* regarding these operations.

Deficiencies:

- A storm water pollution prevention plan (SWP3) has not yet been developed for the Street Department Garage. Per Part III.B.6.c of the NPDES permit, this plan must be developed and implemented by **June 2011**. The SWP3 for this facility

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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. Ohio EPA's inspection of this facility revealed several deficiencies in storm water BMP implementation. For details, please refer to the Facility Inspection Worksheet for this site. The Village Park does not require an SWP3 to be developed but the Village should implement storm water BMPs such as inlet protection and equipment inspections to prevent the discharge of pollutants into the Village's MS4.

- The SWP3 for the municipal facility subject to this program must provide a storm water contact or pollution prevention team. At a minimum, we recommend that a storm water contact be designated for the Street Department Garage that will have the authority and knowledge to ensure implementation of the SWP3 associated with this facility. 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 Village has not developed contract language to require storm water BMP implementation when a third-party provides municipal operations on behalf of the Village. Contract language must be added to all contracts with such parties, e.g., operators that provide street sweeping services, storm sewer projects, waste removal, or road maintenance activities. Further, we recommend periodic inspection of their operations to assure that they are implementing BMPs.
- The Village does not appear to track the total amount of street sweepings and catch basin cleanings removed from the MS4. Please be sure to track these amounts if you have not yet begun to do so, as it is required to be reported on the new Annual Report form. The amount of street sweepings should be tracked separately from the amount of catch basin cleanings. In addition, the Village needs to track salt usage, catch basin cleaning, and street sweeping 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 Village's salt usage records are lacking and this information needs to be tracked more closely. Please refer to the *Municipal Storm Water Program Evaluation on deicer usage*.
- The Village does not have a certified applicator to carry out the Village's pesticide application plan. The Village must have at least one licensed applicator on staff at all times. For further information about licensing, please contact the Ohio Department of Agriculture Pesticide & Fertilizer Regulation Section at (614) 728-

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6987. In addition, the Village's Fertilizer and Pesticide Application Plan is missing needed information. Please provide me with a copy of the revised plan. For more information refer to the *Municipal Storm Water Program Evaluation on Pesticides, Herbicides & Fertilizers*.

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 17, 2010.** Please note that this response does not replace the requirement to submit an Annual Report. Your annual report for 2010 will be due on April 1, 2011.

If you have any questions, please contact me at (330) 963-1164 or via e-mail at lindsie.macpherson@epa.state.oh.us.

Sincerely,



Lindsie MacPherson
Assistant to the District Engineer
Division of Surface Water

LM/mt

cc: John Shirley, Village Administrator, Village of East Canton
Todd Paulus, Stark County Health Department, Unit Manager
Ohio Department of Agriculture Pesticide & Fertilizer Regulation Section

ec: Dan Bogoevski, Ohio EPA, DSW, NEDO

Municipal Storm Water Program Evaluation MS4 Maintenance Component Worksheet

Date of Evaluation	July 1, 2010
Evaluator Name, Title	Lindsie MacPherson, DSW, NEDO
MS4 Permittee	Village of East Canton

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
John Shirley Village Administrator	Village of East Canton	330.488.0360
John Rinehart Service Employee	Village of East Canton	330.488.0360
Barbara S. Hall Fiscal Officer/ Clerk of Council	Village of East Canton	330.488.0220
Jackie Branch Service Clerk	Village of East Canton	330.488.0220
Todd Paulus Unit Manager	Stark County Health Department	330.493.9904
Bethany Perkowski Public Health Sanitarian	Stark County Health Department	330.493.9904 perkowskib@starkhealth.org

MS4 Mapping	
Interview Questions	Response
Outfalls and receiving waters mapped? (7 total)	YES
Catch basins?	YES – By hand
Pipes, ditches, other conduits?	NO
Public stormwater facilities (BMPs)?	NO
Private stormwater facilities (BMPs)?	NO

MS4 Mapping		
Interview Questions	Response	
How maps are used (i.e. tracking illicit discharges)?	If there is a spill the Village uses the map to track where the spill will flow and where they need to remediate.	
Applicable Documents	Reviewed	Obtained
Map(s) of MS4 system	YES	YES

Notes
<p>MS4 Mapping</p> <p>The Village of East Canton has a contract with the Stark County Health Department (SCHD) to map all outfalls and conduct the Village's dry weather screening. The Village has asked for an extension of the permit period for the mapping requirements. All catch basins in the village have been mapped by hand at this time. The Village has started marking open and closed ditches, but pipes, ditches, conduits, and public and private stormwater management facilities are not mapped at this time. The Village proposed to have the Stark County Regional Planning GIS Department map the Village storm sewer system, but the plan was not approved. The Service Department is working on mapping the entire Village <i>by hand</i> and then possibly passing the work onto the SCHD or the Village Engineer to complete the mapping electronically. Please be sure the finished map contains the location of all outfalls, receiving waters, and the new requirements for the current permit term.</p> <p>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.</p> <p>Identifying the Location of Discharging Home Sewage Treatment Systems (HSTs)</p> <p>The Village has 4 HSTs and all have been mapped with a list of addresses that can be found in the office. Please be aware that these discharging systems are considered illicit discharges to the MS4. Permit #OHQ000002 requires the Village to work with the SCHD 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.</p> <p>Illicit Discharge Detection</p> <p>The Village has a contract with the SCHD to dry weather screen all outfalls annually. The SCHD sends an annual report to the Village noting any illicit discharges. The SCHD is also under contract to track the illicit discharges and eliminate them. If the Health Department does not have the authority to enforce action on noncompliance they will refer it to the Village, in which case the Village has passed the IDDE ordinance which allows them to enforce action on illicit discharge matters. The SCHD will notify the Agency of authority when a spill is noted. In 2009, 4 of the 7 outfalls were screened, 0 dry weather flows were identified, 1 illicit discharge identified and 1 eliminated.</p> <p>Please be aware that the NPDES permit #OHQ000002 requires the Village 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. <i>If any</i></p>

Notes
<p><i>illicit discharges are detected during this screening, the village must develop a plan to eliminate them. For more information on the illicit discharges from HST5s 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.</i></p>

Catch Basin Cleaning		
Interview Question	Response	
Schedule established for inspections and cleaning?	YES	
	The Village starts the cleaning process in the summer and cleans and inspects all the catch basins once a year. The crew starts with the East/West streets and then jump over to North/South streets.	
Is cleaning and maintenance of catch basins tracked:	YES	
	The Village will put the date and location of repairs and cleaning on a records sheet. <i>The Village does not track the total amount cleaned out of the MS4. See Notes.</i>	
How are spoils materials disposed of?	The spoils are deposited in the dumpster at the Street Department. If these spoils are saturated there are procedures the Village must follow before the spoils can be placed in the dumpster. See Notes.	
Are storm drain pipes inspected?	YES	
Proactive or only in response to blockage event?	Some of the storm sewers are replaced with plastic piping. When cleaning out the catch basins the Village will also inspect the surrounding piping.	
Applicable Documents	Reviewed	Obtained
List of active municipal construction projects	N/A	N/A

Notes
<p><u>Catch Basin Cleaning Disposal and Tracking</u></p> <p>If the Village plans to continue to dispose of catch basin cleanings in this dumpster, the spoils must be dewatered, if saturated, before they can be placed in the dumpster. A dewatering process allows for the leachate to go to a sanitary sewer or holding tank. The dried materials can then be placed in a covered bin and disposed of properly. The dumpster the Village is using for solid waste also needs to be <i>plugged</i> to prevent the discharge of solid waste leachate to the Village's MS4.</p> <p><i>*Also, the Village needs to track the amount of material removed from the catch basins and MS4 and have a running tally so the total amount can be placed in the Village's annual report for 2010. Please be sure to report the total 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.</i></p>

M54 System Repair and Maintenance

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 M54 program and reduce pollutants.

Municipal Construction Projects

The Village has a Memorandum of Understanding with Stark Soil & Water Conservancy District to carry out the Village's mandated responsibilities of the Ohio EPA NPDES Phase 2 Permit Parts 3.2.4 (MCM 4) and 3.2.5 (MCM 5) from 2007-2009. On March 1, 2010 the Village entered into another MOU with SSWCD for 3 years to carryout Parts III.B.4 and III.B.5 dealing with MCM 4 and 5.

Stormwater Management Facilities Operation and Maintenance			
Interview Questions	Response		
Public facilities inspected? Frequency:	NO Village does a visual inspection when needed, usually once a month. Every two years the Village will dredge out the basins. No formal inspection at this time.		
Private facilities inspected? Frequency:	YES There is a retention basin owned by Stark County and then Osnaburg local schools own a water quality retention basin on Noble Street East. Stark County will come in and inspect their basin. The Village has an MOU with Stark Soil & Water Conservancy District to carry out inspections of post-construction water quality BMPs. See Notes.		
Checklist used for inspections?	YES/NO		
Have maintenance standards and procedures been established for these facilities?	YES The Village has adopted the Rainwater and Land Development manual and other EPA accepted manuals.		
How is maintenance prioritized? Is data evaluated to target maintenance resources?	YES When the algae becomes overburdening, the Village will begin inspection and maintenance procedures for the structure. The underground culvert grates are cleaned every time it rains.		
	Applicable Documents	Reviewed	Obtained
Inspection checklist		NO	NO

Notes

Maintenance Program for Public Storm Water Infrastructure

The Village is responsible for the maintenance of a retention basin in East Canton Village Park, another retention basin located at East Church Street and South Wood Street, and last, a galvanized headwall in Osnaburg Ditch on South Werley. Part III.B.6.d.iii.1 of the NPDES permit requires the Village of East Canton to establish maintenance schedules, maintenance activities and long-term inspection procedures to reduce the discharge of floatables and other pollutants from the MS4. In order to comply with this section of the NPDES permit, the Village must expand upon these activities and formalize their requirements by adopting or establishing standard operating procedures for stormwater infrastructure, including regular inspection. Ohio EPA recommends the Village adopt or create a checklist by which to conduct these inspections to standardize inspection procedures amongst inspectors. Regular inspections will help you prioritize maintenance activities. Information to improve your program is available at http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm?action=min_measure&min_measure_id=6.

Long-Term Maintenance of Post-Construction BMPs

The Village has a Memorandum of Understanding with the Stark Soil & Water Conservancy District to carry out the mandated responsibilities of the Ohio EPA NPDES Phase II Permit Parts III.B.4 and III.B.5 (Minimum Control Measure 4 and 5). Within this Memorandum the District states that they will inspect structural post-construction water quality practices and notify the private owner and the Village of any required maintenance for these structures. The Village of East Canton has one water quality BMP that was just completed for the Osnaburg school. The first annual inspection for long-term maintenance will be next summer and the inspection report and checklist will be sent to the Village. *Please be sure the Village is receiving reports on the Districts actions and that inspection reports are sent to the Village annually from this point forth.*

Part III.B.5.d of the NPDES permit requires the Village to develop a program to ensure long-term maintenance of post-construction BMPs. This program must encompass all public and privately-owned post-construction water quality practices installed since April 21, 2003. Post-construction water quality practices are BMPs designed to treat the Water Quality Volume (WQv) and include structures such as bioretention cells, permeable pavements, enhanced water quality swales, sand filters, extended detention ponds, constructed wetlands and proprietary devices (including underground structures). They can also include non-structural BMPs such as riparian setback areas or conservation easements. An acceptable long-term maintenance program for post-construction BMPs consists of:

1. Ensuring that the SWP3 includes a long-term maintenance plan for all post-construction BMPs. The plan should identify the party responsible to conduct maintenance, the routine and non-routine maintenance activities for each practice with schedule, a blank inspection checklist for each practice, a site map showing the location of the practice(s) and the easements or agreements for access.
2. Periodically inspecting or otherwise verifying that the post-construction BMP is being maintained in a functional condition per the long-term maintenance plan, and
3. Taking enforcement action against the responsible party if they fail to maintain the BMP as required

Information on developing a long-term maintenance program for post-construction BMPs can be found in the Center for Watershed Protection document titled ***Managing Storm Water in Your Community: A Guide for Building an Effective Post-Construction Program*** downloadable at http://www.cwp.org/index.php?option=com_docman&task=cat_view&gid=76&Itemid=118. (**Tool 6: Plan Review, BMP Construction, and Maintenance Checklists) This resource includes inspection checklists to ensure the proper construction of post-construction BMPs as well as their long-term maintenance.

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.

Road Maintenance	
Interview Questions	Response
<p>Streets regularly swept?</p> <p>Frequency:</p>	YES
	The Village contracts out Reilly Sweeping Inc. to sweep all Village streets once a year. The Contractors are given a map of the Village streets to be swept and usually finishes in one to two days. The company will usually come out in April or May.
Frequency based on water quality factors (e.g. proximity to streams)?	NO
How are spoils disposed of?	Reilly Sweeping will dump the spoils at the streets Department and the Village will hull the debris to American Landfill. The stockpile usually remains at the yard for 3-4 weeks. At this time, the effective rules at the OEPA qualify street sweepings as a solid waste, and the stockpiling of these materials is considered open dumping of solid wastes. See Notes.
Does the community collect road kill?	YES
What do they do with the carcasses?	The Village of East Canton has developed a Road Kill Plan for the Village to follow. The carcasses are placed in a plastic bag and with lime and placed in the lidded dumpster at the service department.
Does the community have a leaf collection program?	YES
What do they do with the collected leaves?	J&J Refuse places 2/4 dumpsters at the Village Park and the residents will bring the leaves to the Park for pickup. The program starts at the end of October and the Village will inspect the dumpsters daily to ensure all the leaves end up in the dumpsters and all bags have been removed. J&J will then take away the roll offs when the Village calls. The program usually last about a month.

Road Maintenance	
Interview Questions	Response
<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 Village Service Department conducts road patching, catch basin repairs, snow removal, stripping of school cross walks, etc.</p> <p>There are not a lot of activities conducted by the Village but all employees are aware of BMPs that would need to be enacted.</p>
<p>BMP guidance available to field staff?</p>	<p style="text-align: center;">YES</p> <p>The employees are given the Villages plans for municipal operations. There are books in the trucks on BMPs to be carried out and posters hanging up in the garage. Staffs are trained on material in the books. <i>*Please be sure that part time staffs are also trained on these BMPs.</i></p>
<p>Deicers used by MS4?</p>	<p style="text-align: center;">YES</p> <p>The Village does their own salting using standard Road Salt with the addition of grit when absolutely necessary.</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 style="text-align: center;">YES</p> <p>There is not much of a tracking program for salt usage. The Village will try to track per storm event, but at this time, there is no record of salt used, only salt purchased. See Notes.</p> <p>The Village of East Canton follows a Deicing plan, which outlines procedures for the Village's salting. The Village will salt intersections before a storm starts and will do spot salting as the Village police ask. When it starts to storm the Village will plow first and then salt once the proper permission is given.</p>
<p>Sand/salt swept up after application?</p> <p>How soon?</p>	<p style="text-align: center;">YES</p> <p>Salt is stored in a building at the end of the Streets Department. The building is totally enclosed and trucks load inside. When loading the bin, spillage must be swept up immediately and placed back within the storage bin to prevent accidents and contamination.</p>

Road Maintenance			
Interview Questions		Response	
Does your community operate a snow stockpile yard to store snow that has been removed from community streets and parking lots?		NO	
Has your community considered implementing best management practices to control the discharge of pollutants from snowmelt associated with snow storage yards?		NO	
Applicable Documents		Reviewed	Obtained
BMP guidance		YES	NO
Street sweeping records		YES	YES
Deicer application records		NO	NO

Notes
<p><u>Street Sweepings Disposal</u></p> <p>The Village of East Canton has their streets swept by Reilly Sweeping Inc. The company sweeps the Village's streets once a year and stockpiles the spoils at the side of the Streets Department until 3 to 4 weeks later when the Village will hull the pile to American Landfill. The stockpiling of waste removed from the Village's MS4 is considered open dumping of solid wastes and this is a violation of ORC 3734.03 and OAC 3745-27-05(C). Although our Division of Solid and Infectious Waste Management (DSIWM) is currently considering an exemption that would approve certain beneficial reuses of street sweepings, the effective rules at this time qualify street sweepings as a solid waste. In addition, there is no containment of the pile, which allows for an illegal discharge of leachate. This is a violation of Part III.B.6.d.iii.3 of the NPDES permit #OHQ000002 and Ohio Revised Code 6111.04 and 6111.07. The Village must find an alternative storage method for handling street sweepings. <i>The Village has suggested bringing in a hopper from J&J Refuse for Reilly to dump the spoils. This procedure will work fine, as long as the Village ensures that the hopper is covered for the time that it is located at the Street Department until it is hulled away to American Landfill. Please clean the area where the street sweepings are now stored and dispose of the spoils in the proper manner.</i></p> <p>*Also, the Village needs to <i>track the amount of material removed from the Village's streets so the total amount can be placed in the Village's annual report for 2010.</i> Please be sure to report the total 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.</p> <p><u>Deicer Usage</u></p> <p>Tracking road salt usage is one BMP that can help reduce the use of deicers. By tracking this information more closely, you may spot abnormalities in salt usage that can indicate when equipment maintenance is needed, when staff may not be following salt application guidelines and when inventory loss occurs. Other practices that can reduce the use of road salt include regular calibration of salt spreaders and developing a deicer application policy that identifies the level of service to be provided, where "bare pavement" is desired, how quickly streets are to be cleared, what percentage of streets are to get priority and in what areas snow may be hauled away. Priority can be assigned based on the number of vehicles per day, traffic patterns, accident records, school zones, and commercial and industrial areas. Ohio EPA urges you to adopt the sensible salting policies recommended by the Cuyahoga County Engineer or the Salt Institute. A wealth of information is available at www.saltinstitute.org on how to reduce pollution from road deicing activities.</p>

Notes
Finally, be aware that the Annual Report requires information to be reported on a January to December calendar year basis. This may require you to adjust how you summarize salt usage data, as most communities have typically been tracking usage on a winter season basis. Please keep in mind that the Village is required to track salt usage as well as the use of additives, i.e., grit.

Flood Management			
Interview Questions		Response	
Inventory of flood management structures completed?		YES	
Structures been assessed for stormwater retrofit?		NO	
New structures include water quality considerations?		YES	
		The Village has adopted open swales, etc. The Village Engineer has retired, so if something comes up the Village will have to outsource until another employee can be found.	
Applicable Documents		Reviewed	Obtained
Inventory		YES	YES

Notes
<p>Inventory</p> <p>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.</p>
<p>Stormwater Retrofits</p> <p>The Village'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 Village 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.</p> <p>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.</p>

Facilities Operation & Maintenance																									
Interview Questions	Response																								
Inventory of MS4 facilities complete (i.e. facilities owned and operated by the MS4)?	YES																								
<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 • Airports • Shipping Ports or Marinas • Steam Electric Power Plants • Wastewater Treatment Plants ≥ 1 MGD or with a pretreatment program <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 • Leaf Collection Yards <ul style="list-style-type: none"> ✓ No discharge of leafate permitted • Maintenance Yards <ul style="list-style-type: none"> ➤ How many do they operate? 1 ➤ List facility names/locations: <p style="margin-left: 40px;">Street Department 133 Werley St. South East Canton, OH 44730</p> • Composting Operations <ul style="list-style-type: none"> ✓ No discharge of leachate permitted • Solid Waste Transfer Stations or Operations • Parks & Cemeteries: <ul style="list-style-type: none"> ➤ How many in UA? 1 Park ➤ List facility names/locations: <p style="margin-left: 40px;">East Canton Village Park (Werley Park) North Werley</p> 	<table border="1"> <thead> <tr> <th><u>Response</u></th> <th><u>SWP3 Developed?</u></th> </tr> </thead> <tbody> <tr> <td>NO</td> <td>N/A since do not operate</td> </tr> </tbody> </table> <p>NOTE: No permit or SWP3 required if facility has no exposure. However, even if a No Exposure Certification has been submitted for the facility, inspect to verify validity.</p> <table border="1"> <tbody> <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>NO</td> <td>N/A since do not operate</td> </tr> <tr> <td>YES</td> <td>N/A</td> </tr> </tbody> </table>	<u>Response</u>	<u>SWP3 Developed?</u>	NO	N/A since do not operate	YES	NO	NO	N/A since do not operate	NO	N/A since do not operate	YES	N/A												
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Facilities Operation & Maintenance		
Interview Questions	Response	
	Response	SWP3 Developed?
<ul style="list-style-type: none"> • Parking Lots <ul style="list-style-type: none"> ➢ How many do they operate? 5 lots ➢ List facility name/locations: • Bus Terminals • Vehicle Maintenance Garages <ul style="list-style-type: none"> ➢ How many do they operate? ➢ List facility name/locations: <p style="margin-left: 40px;">Street Department Garage 133 Werley St. South East Canton, OH 44730</p> 	<p>YES</p> <p>NO</p> <p>YES</p>	<p>N/A</p> <p>N/A since do not operate</p> <p>NO</p> <p>*SWP3 (or, in case of airport and shipping port, NPDES permit for industrial storm water) required only if vehicle maintenance, equipment cleaning or deicing operations occur.</p>
Facilities inspected?	NO	
Frequency:	No formal <i>stormwater</i> inspection of the Street Department at this time. This will be a part of the SWP3 the Village develops for the Streets department.	
Checklist used?	NO	
	Checklists are recommended to 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):	John Shirley and John Rinehart	
Is there a designated stormwater contact person for each facility?	NO	
	The Village needs to identify a stormwater contact person for the Streets department to be aware of all stormwater issues at the facility and uphold to contents of the facility's SWP3.	
	The Village indicated the contact person will be either John Shirley or John Rinehart.	
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 employee handbook outlines all disciplinary actions to be taken when there is noncompliance. These procedures are applicable to storm water related issues.	

Facilities Operation & Maintenance		
Interview Questions	Response	
Parking lots owned/operated by the permittee swept? Frequency?	YES When needed, the Village will sweep the Village Hall Lot.	
Do you have any combined sewer systems?	NO	
If yes, do you have any combined sewer overflows?	NO	
Are you aware of any illicit cross connections between your sanitary sewer and MS4?	The Village is not aware of any cross-connections at this time. The SCHD has done the dry-weather screening for the Village for 2010.	
If so, what is your plan to eliminate this illicit discharge?	As discussed in the first section of this worksheet. The SCHD and Village administration work together to investigate illicit discharge sources and have the owners make the correction.	
Have you investigated the extent of infiltration and inflow into storm sewer system?	NO	
What methods have been used to conduct this investigation?	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.	
What are your plans to repair and eliminate this source of illicit discharge?		
Sewer spill and cleanup procedures in place?	YES	
	The Sanitary Sewer District for Stark County has procedure in place for the Village. The Village also has their own Spill response plan which indicates the location of spill kits at the service department, and procedures to be followed in the event of a spill.	
Applicable Documents	Reviewed	Obtained
Facility inventory	YES	YES
Facility SWPPP	NO	NO

Notes
<p>Storm Water Pollution Prevention Plans (SWP3s)</p> <p>A Storm Water Pollution Prevention Plan (SWP3) must be developed and implemented for the following facility:</p> <p>Street Department Garage 133 Werley St. South East Canton, OH 44730</p>

Notes

The Ohio EPA General Storm Water NPDES Permit for Small MS4s #OHQ000002 requires the Village of East Canton to develop and begin implementing the SWP3 for the above facility within 2 years of permit renewal, i.e., by June 2011. Although a SWP3 is not required for the Park, the EPA recommends that the site be inspected for implementations of BMPs to help prevent stormwater pollution.

The above facility 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

The Village is well on its way to developing a SWP3 for the Streets Department. There is a facility inspection sheet the Village has developed for the Street Department Garage, the Water Garage, and the Park that can all be retrofitted into stormwater inspection sheets to use as a guide for conducting facility inspections. The Village has identified a list of Best Management Practices to be implemented at the Streets Department and then plans for deicing, fleet washing, spill response, road kill pick-up, and fertilizer and pesticide application that can all be included as part of the facility's SWP3. All of these materials along with the information above and in the Facility inspection Worksheet will be helpful in developing a SWP3 for the Village of East Canton Streets Department Garage.

Pesticides, Herbicides & Fertilizers		
Interview Questions	Response	
Certified applicators used?	NO	
	Mad Dog weed killer is used throughout the Village. No Certified Applicator.	
Integrated Pest Management (IPM) practices used?	NO	
Storage location of pesticides, herbicides, and fertilizers:	Stored in a plastic tote with sprayer at the Service Garage.	
BMPs used during application:	The Village will follow the manufactures recommendations. They will look at weather and if it looks like it is going to rain they will not apply.	
Fertilizer/pesticide application plan utilized?	YES	
	The Village has a Fertilizer and pesticide application plan. See Notes.	
Applicable Documents	Reviewed	Obtained
Fertilizer/pesticide application plan	YES	YES

Notes

The Village does not apply fertilizers at this time. Pesticides are sprayed in areas only when needed, but most problems are taken care of with weeding. The Village has a contract with the SCD to spray for mosquitoes annually for up to 5 sprays if needed. All chemicals are stored at Perry TWP Service Garage.

Fertilizer and Pesticide Application Plan

The Village has provided the EPA with a fertilizer and pesticide application plan, but the plan needs to include a bit more information than given. 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 and where the chemicals are being applied. If a contractor is being used as well, the Village 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.

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 Village must have at least one licensed applicator on staff. 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 Requirement:

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 Village of Cleveland is using this method to revegetate neighborhoods where blighted homes have been razed. This will reduce costs to the Village 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

Notes
environment. For further information, please refer to http://www.epa.gov/pesticides/factsheets/jpm.htm .

Standards, BMPs, & Outreach		
Interview Questions	Response	
BMP technical guidance document available to maintenance staff?	YES The employees are given the Villages plans for municipal operations. There are books in the trucks on BMPs to be carried out and posters hanging up in the garage. Staffs are trained on material in the books.	
MS4 use contractual staff to complete MS4 maintenance activities?	YES Street sweeping, large storm sewer projects, paving, tree service, J&J Refuse, large road projects.	
BMP guidance materials provided to contracted staff?	NO If there is a large construction project, they follow the standards with SSWCD.	
Requirement to consider stormwater impacts and utilize appropriate BMPs in contracts?	NO Unknown for other contracts. The village will add language to new contracts.	
Materials used to educate the public regarding stormwater impacts on MS4 property (if applicable, i.e. public spaces):	<p><u>Pet waste:</u> Signs for "Clean up after Pets" in the Village's Parks and information on in newsletters and website.</p> <p><u>Litter reduction:</u> Recycling programs. Spring clean up to involve village groups. After clean up there is a cook out where information is handed out to participants. Information passed out to schools. Volunteers for Village clean-up. Adopt a street program for clean-up etc.</p>	
Applicable Documents	Reviewed	Obtained
BMP manual or guidance document	YES	NO
Contract language for MS4 operation and maintenance activities	NO	NO

Notes
Technical Guidance and Specifications for Maintenance Staff Once it is prepared, the Village will need to train staff on the SWP3 for the East Canton Street Department Garage and should look to adopt standards and specifications for storm water pollution

Notes

prevention implementation in all its municipal operations with the potential to release pollutants in storm water runoff (e.g., inspecting the leaf collection area in the fall and other dumpsters throughout the Village). 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

The Village contracts services such as street sweeping, large storm sewer projects, tree service, waste removal, and large road projects. 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 Village 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 Village 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 The Village holds informational meetings with Stark SWCD to discuss the Village's Permit and what is being done with the MS4 program. Employees have attended training sessions by Stark Regional planning, SCHD and other agencies.				
Materials used to train staff:	All training materials were provided in the interview, including sign-in sheets, meeting notes, flyers, etc.				
Applicable Documents					
Training materials	<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">YES</td> </tr> </tbody> </table>	Reviewed	Obtained	YES	YES
Reviewed	Obtained				
YES	YES				

Notes

MS4 Staff Training

The first generation of the MS4 permit required the Village 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. *Please note that NPDES permit #OHQ000002 requires the Village to conduct at least one employee training event on these topics per year.* If key management staff attends a storm water education event, it is expected that the information learned will be shared with the appropriate staff so that they can conduct their job duties without causing storm water pollution.

Notes

The Village should also look to incorporate training on storm water pollution prevention in any new employee training program that may exist if that employee's job duties have the potential to create storm water pollution or include illicit discharge identification and elimination.

For training that the Village 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.

The following materials may help with developing a training program:

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.

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.

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.

The Center for Watershed Protection also has information available for training in their Manual #9: Municipal Pollution Prevention/Good Housekeeping Practices.

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.

FIELD INSPECTION WORKSHEET

MS4 SWMP Evaluation

MS4 Maintenance Facility Field Inspection Worksheet

Permittee: Village of East Canton Street Department	
Address of facility: 133 S. Werley, East Canton 44730	Size of facility:
Date of visit: 7/1/2010	Time of visit: 12:15 p.m.
Provide the name(s) and title(s) of permittee staff present during inspection	
Name	Title
<i>John Shirley</i>	<i>Village Administrator</i>
<i>John Rinehart</i>	<i>Service Employee</i>
Evaluator Observations:	
SWPPP or stormwater plan	
Has the maintenance facility developed a SWPPP or stormwater plan?	NO. The Village 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?	The two catch basins on site were not labeled but they were free of debris and other pollutants.
Vehicle maintenance, fueling and washing	
Are vehicle maintenance activities conducted in a designated place not exposed to stormwater?	YES. The Village sends most of their vehicle maintenance to RB trucking. Oil changes are conducted in-house by the Village. All floor drains in the garage are connected to a sand trap before draining to sanitary.
Are fueling stations properly designed with spill kits nearby?	Both fueling tanks sit within secondary containment but are outside. The drain plugs were in place in the dikes. The SWP3 for this facility must include procedures for evaluating the runoff that accumulates within the dikes before it is discharged. Oil sheens must be removed with absorbent pads or other such materials before this runoff can be discharged to the MS4. The emergency shot-off button is located inside the Garage next to the spill kit. Both the emergency shut-off button and the spill kit need to be labeled and easily assessable.

<p>Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer?</p>	<p>All vehicles and equipment are washed inside the streets garage where floor drains are connected to sanitary.</p>
<p>Material storage</p>	
<p>Are all materials that are potential stormwater contaminants stored under cover or in secondary containment?</p>	<p>The Village's salt supply is stored inside the garage in a separate room with a garage door separator. This setup allows for the Village to conduct all loading and unloading of salt inside the streets garage where the floor drains are connected to sanitary.</p> <p>There is a stockpile of street sweepings located at the side of the garage that is dumped there by Reilly Sweeping until the Village can haul the spoils to America Landfill. This qualifies as open dumping of solid waste. There are no controls in place to prevent the discharge of leachate from these piles into the MS4 See Notes.</p> <p>Grit, sand, water break and excavated material piles are located at the side of the Garage with no sediment controls. Please cover these piles with tarps to prevent sediment laden runoff.</p> <p>Materials at the back of the Water Garage should be disposed of and scrap out unneeded items.</p>
<p>Hazardous waste management</p>	
<p>Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff?</p>	<p>The small container the Village uses to store used oil is currently labeled "waste oil," please change this label to read "Used Oil."</p>
<p>Waste management</p>	
<p>Are waste bins covered with waste properly disposed in containers?</p>	<p>The dumpster at the side of the garage was lidded but the plug was missing. All dumpsters on site need to be lidded, plugged, and inspected for leaks on a regular basis. This inspection process should be included in the sites SWP3 so the dumpsters do not leak solid waste leachate on the yard and become a storm water pollutant source.</p>
<p>How is landscape waste stored?</p>	<p>Landscape waste is not stored at this facility.</p>
<p>Spill response</p>	
<p>Does the facility have a spill response plan, and are spill kits readily available?</p>	<p><i>A spill response plan is a required component of the SWP3.</i> There are spill kit materials located in the streets garage. The Village may want to consider placing the materials in a container for easy transport in the event of a spill. A spill kit should be available at the fueling area and include, among other things mats or booms that can block flow to storm drains.</p>

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. Please refer to the interview worksheet for more information.

Notes or additional information:

Street Sweepings

The Village of East Canton has their streets swept by Reilly Sweeping Inc. The company sweeps the Village's streets once a year and stockpiles the spoils at the side of the Streets Department until 3 to 4 weeks later when the Village will haul the pile to American Landfill. The stockpiling of waste removed from the Village's MS4 is considered open dumping of solid wastes and this is a violation of ORC 3734.03 and OAC 3745-27-05(C). Although our Division of Solid and Infectious Waste Management (DSIWM) is currently considering an exemption that would approve certain beneficial reuses of street sweepings, the effective rules at this time qualify street sweepings as a solid waste. There is no containment of the pile, which allows for an illegal discharge of leachate. ***The Village has suggested bringing in a hopper from J&J Refuse for Reilly to dump the spoils. This procedure will work fine, as long as the Village ensures that the hopper is covered for the time that it is located at the Street Department until it is hauled away to American Landfill. Please clean the area where the street sweepings are now stored and dispose of the spoils in the proper manner.***

Solid Waste Dumpster Plug

Please make sure the dumpster at the side of the garage has the plug in place. Any leaks from the dumpster would be considered a solid waste leachate which would then become a storm water pollution source. The dumpster should be inspected regularly for leaks and the inspection process should be included as part of the facility's Storm Water Pollution Prevention Plan (SWP3), which would include regularity of inspections, what to be inspected, and actions to take if a problem is noted. If the Village plans to continue to dispose of catch basin cleanings in this dumpster, the spoils must be dewatered, if saturated, before they can be placed in the dumpster. A dewatering process allows for the leachate to go to a sanitary sewer or holding tank. The dried materials can then be placed in a covered bin and disposed of properly.

Storm Water Pollution Prevention Plan (SWP3)

The Village of East Canton is required to develop a SWP3 for this facility. In developing this SWP3, the Village must evaluate where all water is draining to throughout the facility. The Village should include all catch basins and their outfalls on the site map that is required to be developed. Potential pollution sources need to be identified e.g. salt storage, gas and diesel fueling tank, yard waste collection area, material stockpiles, sediment laden catch basins, dumpsters, etc. and the Village needs to state the BMPs they plan to enforce to ensure that water pollution does not occur. For more information of this matter please refer to the Municipal Storm Water Program Evaluation Worksheet.

INSPECTION PHOTOS
Street Department
Village of East Canton
Photos Taken: July 1, 2010



Fig 1: The floor drain in the Streets Garage is connected to sand trap before discharging water to the sanitary sewer.

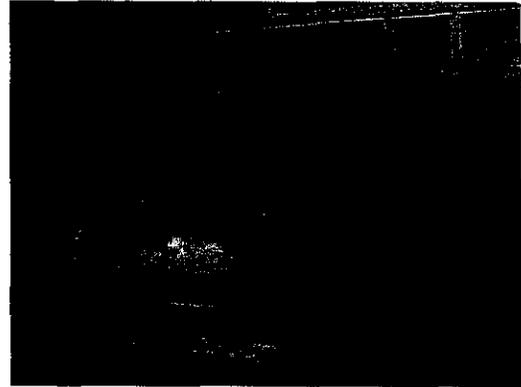


Fig 2: The Village's salt storage is located inside the Streets Garage. All loading, unloading and mixing with grit when needed occurs inside the garage.

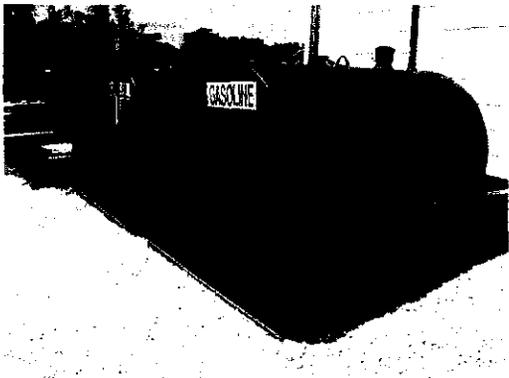


Fig 3: The fueling area is kept in good condition. The plugs are in place and the Village has spill kit material located inside the garage. See note above.



Fig 4: Any excess materials stored on site should be scraped out if not needed or disposed of properly. Watch for pushing material too far back into the woods. Keep all materials on the grassy area where the Village can easily keep an inventory of their items.



Fig 5: Material stockpiles are in a good location but the Village should still provide cover for finer material like the grit and sands to prevent discharge into the Village's MS4.

Fig 6: Water break material

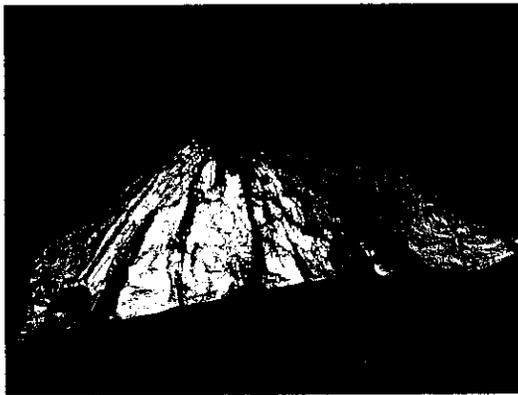


Fig 7: The pile of street sweepings needs to be removed from this site and disposed of properly. See notes above.

Fig 8: The solid waste dumpster is lidded and free of leaks. Please incorporate regular inspections of the dumpster into the facility's SWP3.



Fig 9: The Village needs to make sure there is always a plug in the solid waste dumpster.

Fig 10: Materials behind the Water Garage need to be disposed of properly and scrapped.

FIELD INSPECTION WORKSHEET

MS4 SWMP Evaluation

MS4 Maintenance Facility Field Inspection Worksheet

Permittee: Village of East Canton Park	
Address of facility: N. Werley, East Canton 44730	Size of facility:
Date of visit: 7/1/2010	Time of visit: 12:00 p.m.
Provide the name(s) and title(s) of permittee staff present during inspection	
Name	Title
<i>John Shirley</i>	<i>Village Administrator</i>
<i>John Rinehart</i>	<i>Service Employee</i>
Evaluator Observations:	
SWPPP or stormwater plan	
Has the maintenance facility developed a SWPPP or stormwater plan?	No SWP3 is required for this facility. There is no vehicle washing, fueling, or maintenance occurring at this site.
Does the plan include a site map, list of pollutant sources, BMPs, and maintenance procedures?	The Village does need to implement BMPs at this facility to prevent the discharge of pollutants into the Village's MS4.
Does the permittee conduct and document periodic inspections of the facility?	No formal inspection is required but it is recommended that the Village inspect this site for stormwater on a monthly basis as a good BMP.
Are storm drains labeled and free of debris?	The storm drain is free of debris.
Vehicle maintenance, fueling and washing	
Are vehicle maintenance activities conducted in a designated place not exposed to stormwater?	N/A. No vehicle maintenance occurs at this location.
Are fueling stations properly designed with spill kits nearby?	N/A. There are no fueling stations at this location.
Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer?	N/A. No vehicles or equipment are washed at this site. If equipment is rinsed it is done in a grassy area, away from storm drains. A good BMP would be to remove grass from the mowers and dispose of the debris properly.
Material storage	
Are all materials that are potential stormwater contaminants stored under cover or in secondary containment?	There is one stockpile located on a grassy patch but close to a catch basin. If the Village starts to notice the stockpile discharging sediment laden runoff to the catch basin, it will require a tarp or some sort of cover to prevent this discharge.
Hazardous waste management	
Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff?	No hazardous wastes are stored at this site.
Waste management	
Are waste bins covered with waste properly disposed in containers?	All dumpsters are covered and plugged.
How is landscape waste stored?	In the fall, J&J Refuse places 2/4 dumpsters at this site for community residents to drop off leaves. The Village inspects the dumpsters daily to ensure all leaves are in

	the dumpsters and bags have been removed. When the dumpsters are full the Village will call J&J to take them away. If any leachate were produced from the dumpsters, the area is sloped inward, so the leachate will not discharge.
Spill response	
Does the facility have a spill response plan, and are spill kits readily available?	No spill response plan is required for this facility. The Village may want to consider keeping a spill kit inside the garage in case of minor gas spills.
Employee training	
What type of stormwater training do maintenance staffs receive?	Same staffs as the Streets Department. Please refer to the municipal storm water evaluation program worksheet for more information.

INSPECTION PHOTOS

Village Park

Village of East Canton

Photos Taken: July 1, 2010

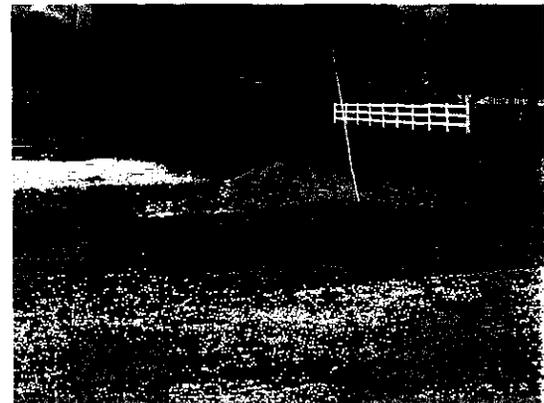


Fig 1: Graveled are where the dumpsters from J&J are placed for leaf drop off.

Fig 2: The stockpile is located on a grassy patch to prevent runoff from entering the adjacent catch basin.