3GQ0011220100622

STARK	LOUISVILLE	CITY OF LOUISVILLE	3GQ00112	2010/06/22	MACPHERSON, LINDSIE

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Environmental Protection Agency

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

June 21, 2010

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

Mr. E. Thomas Ault
City Manager and Storm Water Program Coordinator
City of Louisville
215 S. Mill Street
Louisville, OH 44641

Dear Mr. Ault:

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) 3GQ00112*BG and Ohio Administrative Code 3745-39.

On June 14, 2010, Ohio EPA met with you and other representatives of the City to determine compliance with the NPDES permit and the Storm Water Management Plan (SWMP) submitted by the City in March 2003. In performing this audit, Ohio EPA implemented the Municipal Storm Water Program Evaluation Guide developed by the United States Environmental Protection Agency.

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

Violations:

- **Failure to develop a storm water pollution prevention plan (SWP3) for the Louisville wastewater treatment plant.** This is a violation of Part IV of the City's NPDES Permit #3PD00033*HD for industrial activity associated with the Louisville WWTP. The industrial SWP3 needs to include a comprehensive site evaluation to be completed at least once a year. Any deficiencies in the SWP3 or in the implemented BMPs revealed by the inspection should be recorded and the SWP3 must be revised to correct the problems. The SWP3 should also identify the responsible party for site inspections, and designate a storm water contact person for the facility. A site map is also part of an industrial SWP3, identifying the drainage of all storm water as well as any potential pollutant sources

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- **Failure to compile an inventory of all MS4 facilities, i.e. the Service Center, Wilson Garage, the WWTP, parks and cemeteries, and parking lots.** This inventory was required in the NPDES permit #OHQ000001 and should be in the City's SWMP. The Inventory should be kept up to date in the SWMP and easily accessed to comply with the NPDES Permit #OHQ000002.

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

    - Failure to prevent the discharge of leachate from stockpiles of yard waste, landscape material, and mulch/chip piles.
    - Failure to provide complete coverage of salt piles outside the shed at the Service Center.
    - Failure to prevent the discharge of sediment and oil sheen pollutants to the stormwater inlet at the back of the Service Center.
    - Failure to implement an inspection and maintenance program for solid waste dumpsters to prevent leachate from entering the MS4.
    - Failure to supply sediment controls to material stockpiles lining the back of the service yard.
    - Failure to provide spill kits to fueling areas.

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

- **Failure to ensure adequate long-term operation and maintenance of public/ private stormwater management facilities.** This is a violation of Part III.B.5.d of the Ohio EPA General Storm Water NPDES permit and ORC 6111.04 and 6111.07. The City is required to have an inventory of all public and private stormwater management facilities and the City must develop a program to ensure their long-term maintenance. Ohio EPA recommends that each facility be inspected at least once a year either by the City or the party responsible for long-term maintenance. We recommend the City develop a checklist or adopt a checklist as your standard for conducting these inspections. This will ensure that all facilities are inspected and that all BMPs are constructed and maintained according to the City's adopted standards. A program to ensure long term maintenance of post-construction BMPs typically includes (a) maintaining an inventory of all public and private post-construction BMPs installed since April 21, 2003, (b) maintaining a copy of the long-term

maintenance plan for each BMP, (c) establishing a system to track maintenance activities by the responsible party, and (d) taking enforcement action if maintenance is not performed by the responsible party as required by the maintenance plan. Please refer to the Storm Water Program Evaluation for more information on developing an effective long term maintenance program.

- **Failure to develop an employee training program on how to reduce the discharge of pollutants from the MS4.** This is a violation of Part III.6.a of the NPDES permit and ORC 6111.04 and 6111.07. Although some training has been offered to Service Center staff in 2009, the City has not developed the required staff training program expected under the MS4 program. Be aware that the NPDES permit requires your training program to provide at least one training event per year. Training opportunities involving Ohio EPA can be found at www.epa.ohio.gov/ocapp/storm_water.aspx. Training events provided by Ohio EPA and the materials used at those events are archived at this site and can be used by MS4s to train their staff. US EPA has an archive of MS4-related training at www.epa.gov/npdes/training. Be sure to include storm water pollution prevention training in any new employee training program, where appropriate.

Deficiencies:

- A storm water pollution prevention plan (SWP3) has not yet been developed for the Service Center or the Wilson Park Garage. Per Part III.B.6.c of the NPDES permit, these plans must be developed and implemented by June 2011. Please refer to the Field inspection worksheet for the Wilson Garage for information on possible exclusion from this requirement for this specific facility. The SWP3s for these facilities should include a checklist by which to conduct the inspections. This will standardize inspections and remind inspectors of the critical areas that must be reviewed during an inspection. Checklists should be included in the SWP3s for facilities that require one.

- The SWP3s for municipal facilities subject to this program must provide a storm water contact or pollution prevention team for each facility. At a minimum, we recommend that a storm water contact be designated for the Service Center and the Wilson Park Garage that will have the authority and knowledge to ensure implementation of the SWP3s associated with these facilities. Please be aware that Part IV.C.1 of the NPDES permit requires that a Table of Organization naming points of contact be submitted with your annual report, starting with the report that was due April 1, 2010.

- The City does not appear to track the amount (in tons) of street sweepings and catch basin cleanings removed from the MS4. Please be sure to track these amounts, if you have not yet begun to do so, as it is required to be reported on the new Annual Report form. In addition, the City needs to track salt usage on a January-to-December calendar basis rather than a seasonal total.

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

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

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 July 19, 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: James McBeath, City of Louisville, Director of Service Operations (w/ enclosures)

ec: Sue Mendenhall, Planning Secretary
Phil Rhodes, Ohio EPA, DSW, NEDO
Todd Surrena, Ohio EPA, DSW, NEDO (w/ WWTP enclosure)

Municipal Storm Water Program Evaluation
MS4 Maintenance Component Worksheet

Date of Evaluation	June 14, 2010
Evaluator Name, Title	Lindsie MacPherson, DSW, NEDO
MS4 Permittee	City of Louisville

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**
E. Thomas Ault City Manager	City of Louisville	(330) 875-3321 citymanager@louisvilleohio.org
James L. McBeath Director of Service Operations	City of Louisville	330 875-5644 servicedirector@louisvilleohio.org
Sue Mendenhall Planning Secretary	City of Louisville	330-875-3321 ex. 205 planning@louisvilleohio.org

MS4 Mapping	
Interview Questions	**Response**
Outfalls and receiving waters mapped?	**YES**
Catch basins?	**NO**
Pipes, ditches, other conduits?	**NO**
Public stormwater facilities (BMPs)?	**NO**
Private stormwater facilities (BMPs)?	**NO**
How maps are used (i.e. tracking illicit discharges)?	When a problem with the MS4 arises, the city will, at times, use the map to locate the source and its path through the system. Outfall inspections are contracted out to the Stark County Health Department. The City needs to be sure they are receiving the annual report from the County of inspections completed so they can continue will follow-up maintenance and corrections.

Applicable Documents	**Reviewed**	**Obtained**
Map(s) of MS4 system	**YES**	**NO**

Notes

MS4 Mapping

The City of Louisville has a contract with the Stark County Regional Planning Commission (RPC) to carry out the City's MS4 mapping. Previously, the City had 100% of their outfalls and receiving waters mapped by the Stark County Combined General Health District. The County RPC is in the process of mapping the storm sewer system including piping, ditches, and conduits, as well as catch basins and flood control facilities (retention/detention ponds) in GIS using aerial photography and GPS field locations. The RPC is also entering pipe information, including size and location based on City records and field operations, into the GIS map. The mapping process for the requirements of NPDES Permit #OHQ000002 is approximately 5-10% complete as per the annual report for 2009.

To meet the mapping obligations of NPDES Permit #OHQ000002, i.e., the MS4 permit in effect from 2009-2014, the map must show ***catch basins*** and ***publicly-owned storm sewers, ditches, conduits*** and storm water management facilities (including ***publicly-owned post-construction BMPs***). In addition, the map must show ***privately-owned storm water management facilities*** constructed as post-construction BMPs for new development or redevelopment which has occurred since April 21, 2003.

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

The City has a contract with the SCHD for the mapping of all HSTSs in the City of Louisville. The list of addresses is complete and all have been mapped on the City's MS4 map and are currently being maintained. This map was reviewed during the interview, but there was no copy for the EPA.

Please be aware that these discharging systems are considered illicit discharges to the MS4. Permit #OHQ000002 requires the City to determine which of these systems are not operating as designed and intended. For systems not operating as designed and intended, the City must use the provisions in Ohio Revised Code 6117.51 to require connection to the sanitary sewer system where it is legal, feasible and economical to do so. For systems that cannot be eliminated through connection to sanitary sewers or the installation of a soil absorption system, the property owner must be notified to contact Ohio EPA and pursue coverage under an appropriate NPDES permit.

Illicit Discharge Detection

The City has passed the illicit discharge detection and elimination ordinance on October 19, 2009 (ordinance 09-53). The SCHD conducted 17 HSTS inspections in 2009. But there was no report of these inspections sent to the City that they could provide at the interview. Also, of the 60 outfalls throughout the City, 18 have been screened, 2 dry weather flows were identified and 3 illicit discharges (2 involved sewage, 1 grease spill). These 3 illicit discharges were eliminated but no records were provided at the time of the interview. The goal the SCHD has set is to inspect 20% of the City's outfalls a year which will take them to 100% screened by the end of the permit term in 2014.

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

Catch Basin Cleaning	
Interview Question	**Response**
Schedule established for inspections and cleaning?	**YES** The Service Department crew will usually get through inspecting the City's catch basins once a year and clean the basins that showed a necessity for maintenance.
Is cleaning and maintenance of catch basins tracked:	**NO** The city does not really track their cleaning with the exception of waste manifests from American Landfill. See Notes.
How are spoils materials disposed of?	CB cleanings are taken to the Louisville WWTP to a drying bed (sludge drying bed) set aside for CB cleanings and street sweepings. Once dried, the spoils are taken straight to American Landfill from the bed.
Are storm drain pipes inspected? Proactive or only in response to blockage event?	**YES** The City is very proactive with their MS4 cleaning and maintenance because of the flooding issues in the area. In 2009, the whole storm sewer system was flushed.

Applicable Documents	Reviewed	Obtained
List of active municipal construction projects	**NO**	**NO**
CHECK DATABASE BEFORE INSPECTION: List of municipal projects covered under the Ohio EPA general storm water NPDES permit for construction activities: **No projects at this time. One big project planned for 2011.		

Notes

Catch Basin Cleaning Schedule and Disposal

Chris Speros, the Service Center Superintendent, is in charge of catch basin inspection and cleaning. Throughout the year, with the exception of usually January and February, the City will send out crews to inspect the basins to determine if they need to be repaired or cleaned. In 2009, all catch basins in the City were cleaned and the whole storm sewer system was flushed. The City is very proactive with their MS4 maintenance because of flood issues in the area. Problematic areas are always targeted first, and the crews will stem off from there. Vac-trucks are used to conduct catch basin cleaning. The spoils in the truck are taken straight to a drying bed located at the WWTP. The drying bed is one of the sludge drying beds that the City sets aside for all catch basin cleanings and street sweepings. The spoils are left in this bed until they are dried and then loaded into a truck and taken straight to American Landfill in Waynesburg, Ohio. This process is acceptable because it does not allow the discharge of leachate from the pile of spoils.

The City needs to work on a better system for tracking the cleaning and maintenance of catch basins. The EPA would like to see the City t*rack the amount of material cleaned out, separate from the amount of street sweepings, the date it was cleaned and the location, which will be placed in the City's*

annual report for 2010. Also, the City should determine a goal for catch basin cleaning and place that into their annual report. If the Service crews plan on cleaning all the Catch basins annually or once every 2 years, this data should be placed in the annual report and followed through the upcoming year.

Stormwater Management Facilities Operation and Maintenance	
Interview Questions	**Response**
Public facilities inspected? Frequency:	**YES** Jim Courtney (inspector) inspects publically owned facilities as a visual inspection whenever he is in the area. He will note any problems he sees and report them back to the Service Center.
Private facilities inspected? Frequency:	**YES** Jim also does a visual inspection of private facilities. He notes any problems and sends a letter to the owner stating the maintenance required.
Checklist used for inspections?	**NO** The City has not developed a checklist for these inspections. It is recommended that a checklist be developed to standardize the inspections of post-construction BMPs at least once per year to ensure that all BMPs are constructed and maintained according to the City's adopted standards. As discussed, the occasional visual inspection is acceptable, but the City needs to make sure all facilities are being inspected thoroughly at least once per year using a developed checklist. This checklist will act as the documentation for these inspections. The City should also be sure to keep records of any follow-up from these inspections. See Notes for more information.
Have maintenance standards and procedures been established for these facilities?	**YES** The City has adopted the Rainwater and Land Development Manual as City standards for these facilities.
How is maintenance prioritized? Is data evaluated to target maintenance resources?	**NO** Vegetation has really been the only problem the City has run into with storm water facilities. If Jim finds a problem during one of his inspections, the problem is fixed immediately or the appropriate action to fix the problem is taken.

Stormwater Management Facilities Operation and Maintenance		
Interview Questions	**Response**	
Applicable Documents	**Reviewed**	**Obtained**
Inspection checklist	Does not exist	

Notes

Inspections of Stormwater Management Facilities

The City is in charge of all long-term maintenance of public and private storm water management facilities. Jim Courtney, the City's inspector, conducts all inspections of public and private storm water facilities. His inspections are not formal; if he is in the area he will take a look at the facility and note any maintenance the facility requires. There is no documentation of these inspections and no checklist is used. He will alert the Service Department of any maintenance required of public facilities or send a letter to the owners of the private facilities that need maintenance. One letter sent back in 2006 was discussed during the interview but was never reviewed.

As discussed, it will be beneficial for the City to have an *inventory of all public and private storm water management facilities* and it is recommended that all facilities are *inspected at least once a year with a checklist.* This will ensure that all facilities are being inspected and also ensure that all BMPs are constructed and maintained according to the City's adopted standards. Jim's occasional visual inspections when he is in the area are still a good BMP, but a formal inspection using a checklist is a requirement under Part III.B.5 of the City's NPDES Permit #OHQ000002.

Please be aware that the City is required to ensure long-term maintenance of stormwater management facilities. Ohio EPA requires that this program include privately-owned facilities constructed since April 21, 2003, and all publicly-owned stormwater management facilities. Storm water management facilities include best management practices (BMPs) designed to treat the Water Quality Volume (WQv), otherwise improve the quality of runoff or reduce the volume of runoff generated. BMPs include structures such as bioretention cells, permeable pavements, green roofs, enhanced water quality swales, sand filters, extended detention ponds, constructed wetlands and proprietary devices (including underground structures).

1. Plan review to assure that post-construction storm water quality BMPs are being provided, are designed per required standards and have a long-term maintenance plan
2. Tracking the location of post-construction BMPs and the party responsible for implementing the long-term maintenance plan
3. Performing an inspection to assure that post-construction BMPs are installed per the approved plan
4. Periodically inspecting or otherwise verifying that the post-construction BMP is being maintained in accordance with the long-term maintenance plan using a checklist
5. A *checklist is recommended to perform inspections and should be reflective of the operation and maintenance standards established by the City*
6. Taking enforcement action against the responsible party if they fail to maintain the BMP as required

The City has not yet developed the robust long-term maintenance program for post-construction BMPs, which is a violation under Part III.B.5 of NPDES Permit #OHQ000002. Information on developing an effective long-term maintenance program for post-construction BMPs can be found from the Center for Watershed Protection at http://www.cwp.org/Resource_Library/Controlling_Runoff_and_Discharges/sm.htm.
(****Tool 6**: Plan Review, BMP Construction, and Maintenance Checklists)

As a reminder, Ohio EPA has required a long-term maintenance plan for all post-construction BMPs since April 21, 2003. Although it must be a stand-alone document, it is part and parcel of the Storm Water Pollution Prevention Plan (SWP3) required by the Ohio EPA General Storm Water NPDES Permit for Construction Activities. The goal of the MS4 program is to develop a local review and approval program for the SWP3. *This includes post-construction BMPs and their long-term maintenance plans.* These plans are required to provide a schedule for routine and non-routine maintenance tasks to be undertaken.

Road Maintenance	
Interview Questions	**Response**
Streets regularly swept? Frequency:	**YES** The City contracts this BMP out to Buckeye Street Sweeping. About 25% of the City's streets are swept including curbed and gutter streets at least once a year. The downtown area always done twice a year. The City will go around to the other streets that are not swept with a broom to pick up excess debris. A map is given to the contractor for the streets to be swept. The map is then returned to the City with the cubic yards that the contractor has picked up.
Frequency based on water quality factors (e.g. proximity to streams)?	**YES** Frequency is based on activity. Higher traffic volumes equates to more frequent sweeping in that area. Downtown area always swept twice a year.
How are spoils disposed of?	The street sweeping spoils are taken to the same location as the catch basin spoils and handled in the same manner. Once they are dried they are placed directly from the drying bed to the trucks which take the spoils to American Landfill.
Does the community collect road kill? What do they do with the carcasses?	**YES** Road kill is collected and usually taken to the drying pit at the WWTP if not thrown in a dumpster.
Does the community have a leaf collection program? What do they do with the collected leaves?	**NO** The City does not have a program to go through the City and pick up leaves, but there is an area at the Service Center for residents to drop off landscape waste and leaves. The city takes that material and transfers it to roll-offs at

Road Maintenance	
Interview Questions	**Response**
	least 3 times a week, in the fall probably 5 times a week. About 4 to 6 roll-offs are taken off site to Earthen Wood a week. Maybe 10 during the fall season. See Facility Inspection Sheet for the Service Center. A discharge of leachate was noted on site. Most likely from the uncovered roll-offs.
BMPs used during road maintenance activities? Describe types of road maintenance conducted by community staff and the BMPs used:	**NO** The City partakes in activities such as pothole patching, small cut offs, and catch basin repairs. No BMPs are used and no standard operating procedures are in place. There has also been no training of staff on these issues.
BMP guidance available to field staff?	NO Some BMPs are available to staff through the training at the Service Center. There are written procedures for specific jobs but no BMP guidance is actually hanging on the walls or proved to staffs in booklets. *See notes in Standards, BMPs &Outreach section.*
Deicers used by MS4?	**YES**
Type and amount of deicer and additives tracked? What measures are being taken to minimize the application of deicers?	**YES** The City uses road salt (NaCl) with no additives. Because of the cost of salt the City has cut back on salt application. They will typically leave an inch of snow and only salt intersections, hills, bridges, etc. unless there is ice and then everything is salted. Spreaders are calibrated at the beginning of every winter season as per the manufacture's recommendations. Crew members will follow the spreaders to ensure that they are spreading properly. *The City should consider adopting some of these sensible salting practices into their Storm Water Management Program* so they continue even if the price of salt decreases. The City tracks salt usage via purchase orders per storm event. Records need to be kept on a yearly basis. All records for 2009 should be

Road Maintenance	
Interview Questions	**Response**
	together and at the end of the year a total tonnage should be given after December 31, 2009.
Sand/salt swept up after application? How soon?	**YES** If a street spill occurs, the Service crews will immediately clean up the spill. The salt is stored at the City's Service Center in a 3-sided shed. At this time there is excess salt from the last winter season, and salt is spilling past the roof through the forth side. *The City needs to tarp the salt that remains uncovered by the roof.*
Does your community operate a snow stockpile yard to store snow that has been removed from community streets and parking lots? Has your community considered implementing best management practices to control the discharge of pollutants from snowmelt associated with snow storage yards? If YES, what BMPs have you implemented?	**NO** **YES** If the City ever decides to stockpile snow in their community they will consider BMPs in order to pick an acceptable location.

Applicable Documents	Reviewed	Obtained
BMP guidance	NO	NO
Street sweeping records	YES	NO
Deicer application records	YES	YES

Notes

Street Sweeping

The City contracts their street sweeping out to Buckeye Street Sweeping. About 25% of the City's streets are swept including curbed and gutter streets at least once a year. The downtown area always done twice a year. The City will go around to the other streets that are not swept with a broom to pick up excess debris. A map is given to the contractor for the streets to be swept. The map is then returned to the City with the cubic yards that the contractor has picked up. *The total amount collected needs to be totaled up and placed in the City's annual report.* The street sweeping spoils are taken to the same location as the catch basin spoils and handled in the same manner. Once they are dried they are placed directly from the drying bed to the trucks which take the spoils to American Landfill.

Deicer Usage

The City uses road salt (NaCl) with no additives. Because of the cost of salt the City has cut back on salt application. They will typically leave an inch of snow and only salt intersections, hills, bridges, etc. unless there is ice and then everything is salted. Spreaders are calibrated at the beginning of every winter season as per the manufacture's recommendations. Crew members will follow the spreaders to ensure that they are spreading properly. *The City should consider adopting some of these sensible salting practices into their Storm Water Management Program* so they continue even if the price of salt decreases. The salt is stored at the City's Service Center in a 3-sided shed. At this time there is excess salt

Notes
from the last winter season, and salt is spilling past the roof through the forth side. *The City needs to tarp the salt that remains uncovered by the roof.* The City tracks salt usage via purchase orders per storm event. Records need to be kept on a January-to-December basis. All records for 2009 should be together and at the end of the year a total tonnage should be given after December 31, 2009.

Flood Management		
Interview Questions	**Response**	
Inventory of flood management structures completed?	NO	
Structures been assessed for stormwater retrofit?	NO	
New structures include water quality considerations?	YES	
Applicable Documents	**Reviewed**	**Obtained**
Inventory	Does not exist	

Notes
Inventory An inventory of public/privately-owned stormwater management facilities built since April 21, 2003 is part of the new mapping requirements of NPDES permit #OHQ000002. This inventory must be completed by the end of your next permit term, i.e., June 2014. **Stormwater Retrofits** The City's public stormwater management facilities should be looked at for possible retrofit opportunities so that they treat the Water Quality Volume (WQv). The current MS4 permit (OHQ000002) does not require the City to implement retrofit projects, but they are an important piece of the storm water management puzzle for older, developed parts of the community. Current post-construction requirements only affect areas where new development or redevelopment disturbs 1 or more acre of land. This program will not create BMPs in previously-developed areas unless they are being redeveloped and the 1-acre threshold is met. As such, US EPA is evaluating whether retrofits should be required in future generations of the MS4 permit. It is important to look for retrofit opportunities by making a list of potential water quality enhancement projects and focusing on the implementation of green infrastructure. Typically, retrofitting the outlet structures of existing detention and retention basins to provide extended detention of the WQv is the easiest and most feasible type of retrofit project. However, preferred retrofit projects include installing bioretention cells in existing parking lots or along residential streets, resurfacing with permeable pavement and establishing incentive programs for rain gardens, rain barrels and other forms of downspout disconnection in residential neighborhoods.

Facilities Operation & Maintenance	
Interview Questions	**Response**
Inventory of MS4 facilities complete (i.e. facilities owned and operated by the MS4)?	NO

Facilities Operation & Maintenance		
Interview Questions	**Response**	
Types of facilities included *These need their own NPDES storm water permit for industrial activities, if there is a discharge of runoff from these operations:*		
	Response	**SWP3 Developed?**
• Landfills Type:_____	**NO**	N/A since do not operate
• Airports	**NO**	N/A since do not operate
• Shipping Ports or Marinas	**NO**	N/A since do not operate
• Steam Electric Power Plants	**NO**	N/A since do not operate
• Wastewater Treatment Plants ≥ 1 MGD or with a pretreatment program **Louisville WWTP (3PD00033*HD)** **2301 Ravenna Road** **Louisville, OH 44641**	**YES**	**NO** *under renewal process sense new addition
These do not need their own permit, but do have to develop an SWP3 unless noted as N/A:		
• Impound Lots –taken to vendor Wilson Garage	**NO**	N/A since do not operate
• Leaf Collection Yards ✓ No discharge of leafate permitted	**NO**	N/A since do not operate
• Maintenance Yards ➢ How many do they operate? 1 ➢ List facility names/locations: **Service Center** **1022 W. Main Street &** **1150 W. Main Street** **Louisville, OH 44641**	**YES**	**NO**
• Composting Operations ✓ No discharge of leachate permitted	**NO**	N/A since do not operate
• Solid Waste Transfer Stations or Operations	**NO**	N/A since do not operate
• Parks & Cemeteries ➢ How many in UA? 7 parks ➢ List facility names/locations: **None with garages	**YES**	N/A
• Parking Lots 9 parking lots ➢ How many do they operate? ➢ List facility name/locations:	**YES**	N/A

Facilities Operation & Maintenance		
Interview Questions	**Response**	
	Response	**SWP3 Developed?**
• Bus Terminals	**NO**	N/A since do not operate
• Vehicle Maintenance Garages ➢ How many do they operate? ➢ List facility name/locations: **Service Center** **1022 W. Main Street &** **1150 W. Main Street** **Louisville, OH 44641** **Wilson Garage** **1425 W. Main Rear** **Louisville, OH 44641**	**YES**	**NO**
Facilities inspected? Frequency:	**NO** The City will need to develop a protocol with inspection frequency and an inspection checklist as part of the SWP3 for facilities that require an SWP3. See Notes.	
Checklist used?	**NO** Checklists should be developed to guide inspections of all Facilities with Potential for Storm Water Pollutant Runoff. This will help assure that each facility is inspected thoroughly and that there is consistency between inspectors	
Staff which perform the inspections (department or agency:	Not completed yet.	
Is there a designated stormwater contact person for each facility?	**YES** Jim McBeath will be the stormwater Contact for all facilities.	
Describe enforcement procedures used to address noncompliance on a MS4-owner facility, i.e., what disciplinary measures are taken against those that do not implement standard operating procedures?	The City's enforcement is a progressive scale of verbal warnings, to written, to time off, to eventual discharge. Jim has the authority to enforce these disciplinary procedures when dealing with noncompliance with the City's MS4 permit.	

Facilities Operation & Maintenance	
Interview Questions	**Response**
Parking lots owned/operated by the permitee swept? Frequency?	**YES** At times Parking lots will be swept during the street sweeping process. Not an annual process.
Do you have any combined sewer systems? If yes, do you have any combined sewer overflows? ➢ How many? _____ ➢ Do you track frequency and volume? Are you aware of any illicit cross connections between your sanitary sewer and MS4? If so, what is your plan to eliminate this illicit discharge?	**NO** **NO** **NO** One back in 2006 was eliminated when discovered – Pond at Constitution Park Health Department will notify the city of an illicit discharge. Immediate response will be to locate the problem and eliminated the source.
Have you investigated the extent of infiltration and inflow into storm sewer system? What methods have been used to conduct this investigation? What are your plans to repair and eliminate this source of illicit discharge?	**NO** The City has not investigated this source of illicit discharges. During the interview, it was suggested that while the City flushed the system they could send a camera down to further their investigative program. 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.
Sewer spill and cleanup procedures in place?	**NO** All sanitary sewer overflows have been fixed. There are no written procedures that detail out the City's spill response. The EPA would like to see a spill response plan containing the City's procedures for addressing and cleaning up spills.

Applicable Documents	Reviewed	Obtained
Facility inventory	NO	NO
Facility SWPPP	NO	NO

Notes
Facility Inventory The City has not compiled an inventory of all MS4 facilities. This inventory was required in the NPDES permit #OHQ000001 and should be in the City's SWMP. The inventory should be kept up to date in the SWMP and easily accessed to comply with the NPDES Permit #OHQ000002. **WWTP Storm Water Pollution Prevention Plan** The City is also in violation of Part IV of their NPDES Permit #3PD00033*HD for industrial activity pertaining to the Louisville WWTP for failure to develop a SWP3. A Storm Water Pollution Prevention Plan (SWP3) needs to be developed for the following facility: Louisville WWTP (3PD00033*HD) 2301 Ravenna Road Louisville, OH 44641 **Storm Water Pollution Prevention Plans (SWP3s)** A Storm Water Pollution Prevention Plan (SWP3) must be developed and implemented for the following facilities: The City of Louisville Service Center 1022 W. Main Street & 1150 W. Main Street Louisville, OH 44641 Wilson Garage 1425 W. Main Rear Louisville, OH 44641 The Ohio EPA General Storm Water NPDES Permit for Small MS4s #OHQ000002 requires the City of Louisville to develop and begin implementing the SWP3 for the above facilities within 2 years of permit renewal, i.e., by June 2011. The above facilities must be inspected at a frequency specified in the SWP3. Ohio EPA recommends that facilities be inspected monthly. A comprehensive site evaluation must be conducted at least once per year and a record of that inspection and its findings must be kept with the SWP3. If this annual inspection reveals deficiencies in the SWP3 or BMPs that are ineffective, the SWP3 must be revised to correct the problems. The SWP3 should contain a checklist to provide consistency to facility inspections. The SWP3 should also identify who is responsible for facility inspections as well as a storm water contact person for the facility. Please reference Ohio EPA General Storm Water NPDES Permit for Industrial Activities #OHR000004 ***Part IV. D.2.a.i*** for more information on the development of a ***site map*** for the SWP3s. Also refer to the following website for information on developing SWP3s for these facilities: Developing your SWP3: http://www.epa.gov/npdes/pubs/industrial_swppp_guide.pdf

Pesticides, Herbicides & Fertilizers	
Interview Questions	**Response**
Certified applicators used?	**NO**
Integrated Pest Management (IPM) practices used?	**NO**

Storage location of pesticides, herbicides, and fertilizers:	The City has a drum of weed killer inside the Service Center. The building is locked at night but the barrel is not in a contained area. See Notes
BMPs used during application:	The City does not apply any fertilizer. The only herbicide used is when the Stark County Health Department sprays for mosquitoes. Weed killer is sprayed on some fence lines.
Fertilizer/pesticide application plan utilized?	N/A

Applicable Documents	Reviewed	Obtained
Fertilizer/pesticide application plan	N/A	N/A

Notes

Certified Applicator Requirements

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

Pesticide, Herbicide and Fertilizer Storage Requirements

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

BMPs for Pesticide, Herbicide and Fertilizer Application

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

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

Notes
environment. For further information, please refer to http://www.epa.gov/pesticides/factsheets/ipm.htm. From what it seems, the City does not apply any fertilizer or pesticides, so there is no real need for an application plan. But, in the future, if the City were to start applying these chemicals then an application plan will be necessary. The application records should keep track of the name of the substance being applied and the type of chemical, amount used and time the material is being applied as well as who the applicator was. If a contractor is being used as well, the City needs to include language into the contract that requires the contractor to consider pollution controls where the activities undertaken are a potential source of storm water pollution.

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?	**NO**
Requirement to consider stormwater impacts and utilize appropriate BMPs in contracts?	**NO**
Materials used to educate the public regarding stormwater impacts on MS4 property (if applicable, i.e. public spaces):	Pet waste: Signs stating to clean up after pets Litter reduction: No outreach on litter. Newsletters are sent out with some information. The City has not marked catch basins at this time.

Applicable Documents	Reviewed	Obtained
BMP manual or guidance document	**NO**	**NO**
Contract language for MS4 operation and maintenance activities	**NO**	**NO**

Notes
Technical Guidance and Specifications for Maintenance Staff The City needs to improve the dissemination of technical guidance to its maintenance staff on storm water pollution prevention matters. The City should look for posters that can be hung in work areas or lunchrooms, or guidebooks that can be taken out into the field with maintenance crews. An example poster developed by the Lake County (OH) Stormwater Management Department was given to Jim McBeath at the time of the interview. This will help reinforce employee training. Once it is prepared, the City will need to train staff on the SWP3 for the Louisville Service Center and Wilson Garage and should look to adopt standards and specifications for storm water pollution prevention implementation in all its municipal operations with the potential to release pollutants in storm water runoff (e.g., prohibiting the Fire Department from washing vehicles outside). Existing guidance manuals you may find useful to meet this goal include the ***Rainwater and Land Development*** manual (ODNR, 2006) and the ***Municipal Pollution Prevention/Good Housekeeping Manual #9*** (Center for Watershed Protection, September 2008). This manual is available as a free download on their website at http://www.cwp.org/formmaker/Download-Form_RedirectFormPage.html.

Notes
Contracted Staff The City uses contracted services to complete MS4 operations such as street sweeping, road maintenance, yard waste removal, dry-weather outfall screening. Please be sure to include language requiring pollution controls in all contracts and requests for proposal (RFPs) where the activities are a potential source of storm water pollution. The operations of third party service providers should be reviewed periodically by the City to ensure that the required pollution controls are being implemented. **Public Education and Outreach** The City is in partnership with NEFCO to fulfill their public education and outreach portion of their NPDES permit. Please be aware that the performance standards established in NPDES permit #OHQ000002, i.e., the permit in effect for the next 5-year term, requires the City to use more than 1 mechanism and target at least 5 different storm water themes or messages over the permit term. In addition, you must provide at least 5 public involvement opportunities over the permit term. Certain activities, such as stream clean-ups or storm drain stenciling projects with local boy scout troops, can count toward both requirements because they involve the public as well as educate them on storm water pollution issues.

Staff Education and Training	
Interview Questions	**Response**
Staff trained to identify potential storm water pollution sources which would result in illicit discharges? Frequency:	YES The Service Center has provided MS4 training twice in 2009. The training was a run through of basic housekeeping practices during safety meetings.
Materials used to train staff:	No materials were provided during the interview.

Applicable Documents	Reviewed	Obtained
Training materials	YES	YES

Notes
MS4 Staff Training Although the City states two training session were provided to the City staff in 2009, the City has not developed the required staff training program expected under the MS4 permit. The first generation of the MS4 permit required the City to develop an employee training program to prevent and reduce storm water pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances and storm water system maintenance. No training was documented during the first generation of the City's permit between 2003 and 2008. This does not constitute an acceptable employee training program. *Please note that NPDES permit #OHQ000002 requires the City to conduct at least one employee training event on these topics per year.* If key management staff attends a storm water education event, it is expected that the information learned will be shared with the appropriate staff so that they can conduct their job duties without causing storm water pollution. The City should also look to incorporate training on storm water pollution prevention in any new employee training program that may exist if that employee's job duties have the potential to create storm water pollution or include illicit discharge identification and elimination.

Notes

For training that the City organizes for its staff, please retain: (1) the agenda for the training session, including the date that training was provided and names/organizations of the speakers, (2) an attendance list with the signatures of attendees and (3) one copy of the materials used for training. For outside training attended, include an agenda (if available) or a list of topics, the names of attendees, date attended and a copy of any attendance certificate issued by the training organization.

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: City of Louisville Service Center	
Address of facility: 1022 & 1150 W. Main Street, Louisville 44641	**Size of facility:**
Date of visit: 6/4/2010	**Time of visit:** 1:30 p.m.

Provide the name(s) and title(s) of permittee staff present during inspection	
Name	**Title**
Jim McBeath	***Director of Service Operations***
Chris Speros	***Superintendent***

Evaluator Observations:	
SWPPP or stormwater plan	
Has the maintenance facility developed a SWPPP or stormwater plan?	**NO.** The City is required to develop a SWP3 for this facility similar to that of an Industrial SWP3. See Interview sheet for more information on this matter.
Does the plan include a site map, list of pollutant sources, BMPs, and maintenance procedures?	These are key components of the SWP3 and must be included in the document when it is produced.
Does the permittee conduct and document periodic inspections of the facility?	**NO.** The facility must be inspected for the implementation of storm water best management practices (BMPs) at a frequency specified in the SWP3. Ohio EPA recommends that the facility be inspected once per month. In addition, you must conduct a Comprehensive Site Evaluation annually.
Are storm drains labeled and free of debris?	**NO.** Drain is not labeled and not free of debris. The storm drain near the outfall location for the site at the back of the facility is an area of major concern for the City. See Notes.
Vehicle maintenance, fueling and washing	
Are vehicle maintenance activities conducted in a designated place not exposed to stormwater?	Yes. All vehicle maintenance occurs inside the garage where floor drains are connected to sanitary.
Are fueling stations properly designed with spill kits nearby?	There is only one diesel fueling tank located onsite and there are no catch basins in the area. The rest of the vehicles fuel up at Speedway. The tank has secondary containment to hold 95% of the tanks capacity. The switch to turn the fueling station on is located inside the building. The City needs to place a spill kit next to the fueling station at all times.
Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer?	Yes. All vehicles are washed inside the garage or in the wash bay where all floor drains are connected to sanitary. Be sure to keep all vehicle washing indoors.
Material storage	
Are all materials that are potential stormwater contaminants stored under cover or in secondary containment?	NO. The salt storage shed is inadequate to prevent exposure to storm water. Although it is roofed with 3 sides, the stockpile still appears to be susceptible to run-on. In addition, stockpiles extend beyond the roof and are exposed to precipitation.

	The mulch stockpiles are exposed to precipitation. Mulch should be tarped and there should be controls to prevent the discharge of leachate from these piles. An alternative would be to *remove the mulch piles from the site entirely.* The dirt stockpile in the SW corner of the yard is exposed to precipitation. Dirt stockpiles should be tarped, encircled with silt fence or sediment filter sock, or vegetated. Appliances, scrap metal, equipment parts, etc. need to be removed from the storage yard and disposed of properly. Review the items stored here and scrap out what you can so as to avoid accumulating potential storm water pollutant sources. As a good housekeeping tactic, the City should pull all piping and scrap out of the wooded area in the back and stack or scrap out what is not needed. Tires need to be moved inside to the storage building where the rest of the tires are stored.
Hazardous waste management	
Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff?	The used oil drum in the service garage needs to be labeled "Used Oil."
Waste management	
Are waste bins covered with waste properly disposed in containers?	All dumpsters on site need to be lidded, plugged, and inspected for leaks on a regular basis. *There is a solid waste dumpster at the back of the of the facility with a large whole that needs to be replace. See Photos.*
How is landscape waste stored?	The City operates a yard waste drop off area for residents to drop off their landscape waste and grass clippings at the back of the garage. The material sits on the ground no longer than 2 to 3 days at a time and is then transported to un-lidded roll offs for transport. From inspection, the pile or the roll offs are discharging a leachate that settles at the lowest part of the area which is right where the pile resides. See Notes.
Spill response	
Does the facility have a spill response plan, and are spill kits readily available?	A spill response plan is a required component of the SWP3. The facility maintains a supply of Oil-Dri to absorb spills, but the containers are not labeled and not always located close to potential spill sites. A spill kit should be available at the fueling area and include more than just Oil-Dri, e.g., mats or booms that can block flow to storm drains.
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. To date, the staff has only received training once, in 2009.

Notes or additional information:

Catch Basin Inlet

The catch basin in the SE corner at the back of the yard seems to be the only inlet throughout the yard. All water run-off drains to this low spot of the yard. For this reason, this catch basin needs to *monitored* and protected with some sort of *inlet protection* once the site is cleaned. The area around the basin is completely sediment filled and sediment is being discharged to the outfall adjacent to the basin. This sediment needs to be cleaned out and the area around the basin needs to either be *paved* of *vegetated*. Because such a large portion of the yard drains to this basin it may be necessary to divert some of the run-off away from the basin.

Yard Waste

There is a large pile of yard waste at the back of the Service Center. This is a drop-off site for residents and every 2 to 3 days the City will hull the waste into roll-offs located next to the drop off site. During the inspection a puddle of leachate was noted next to the pile of yard waste and the roll offs, but it was not clear which source the leachate was discharging from. To avoid the problem the City should set up a system where yard waste is hulled into the roll offs daily and the roll offs are to be covered with tarps when loading is complete. If a leachate is still being discharged the city may need to rethink their operation. At this time there are no runoff controls in place for the pile and roll offs and there is leachate discharging from this operation. The City is not authorized to discharge this leachate into their MS4; therefore, the City needs to implement some sort of runoff control or containment structure to halt the discharge while the pile and roll-offs remains at this location.

Salt Storage

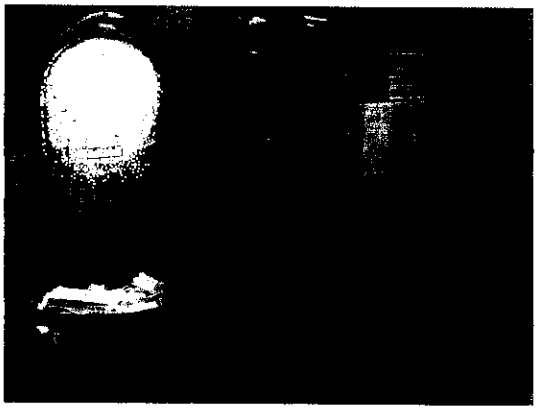
As noted above, the salt storage facility currently in use is inadequate to minimize exposure to storm water. If the City is unable to build a salt storage dome or some other covering area, perhaps the City can locate a publicly-owned building that can be retrofitted to act as a salt storage facility until such time that a dome can be built. Or, perhaps the existing facility can be upgraded at lower cost. Please review the salt storage design recommendations at the Salt Institute website at www.saltinstitute.org for further information.

SWP3

When developing the SWP3 for this site the city needs to evaluate where all water is draining to throughout the facility. The City needs to include all catch basins and their outfalls. Potential pollution sources need to be identified e.g. salt storage, diesel fueling tank, yard waste collection area, material stockpiles, sediment laden catch basins, dumpsters, etc. and the City 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 Interview Worksheet.

INSPECTION PHOTOS
Service Center
City of Louisville

Photos Taken: June 14, 2010



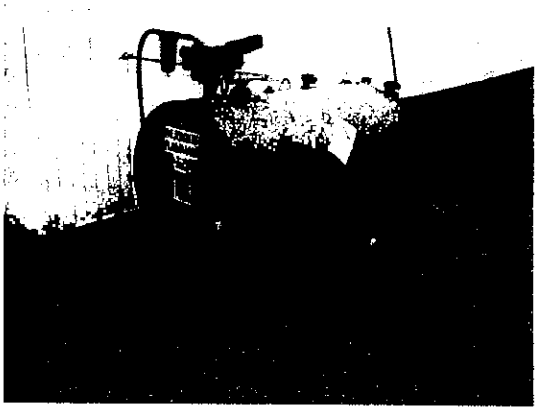
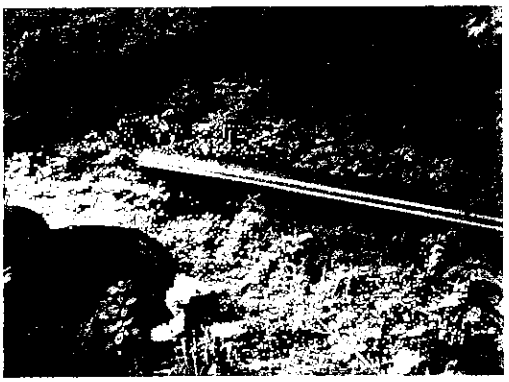


Fig 1: The used oil storage tank on the garage needs to be labeled "Used Oil."
Fig 2: A spill kit needs present at the diesel fueling tank any time that fueling occurs.

Fig 3: The salt is spilling out of the storage shed where it is exposed to storm water. The excess salt needs to be tarped until an alternative storage area can be built.
Fig 4: Salt laden storm water runoff can be seen discharging from the area. This discharge needs to be prevented and the area should be swept up to remove excess salt from the pavement. Under NO circumstance should the City hose off the area.

Fig 5: Area where residents drop of yard waste and grass clippings. Any leachate would discharge to the catch basin at the rear of the facility.
Fig 6: Leachate run-off collects in a puddle at the back of the pile. The leachate could either be discharging from the stockpile or the roll-offs. Either way the City needs to rethink the way this operation is run.

Fig 7: Material stockpiles should have some sort of controls to prevent polluting storm water runoff with sediment.
Fig 8: All stockpiles of wood chips or mulch should be tarped with controls preventing the discharge of leachate from the pile, or better yet, removed from the yard entirely.



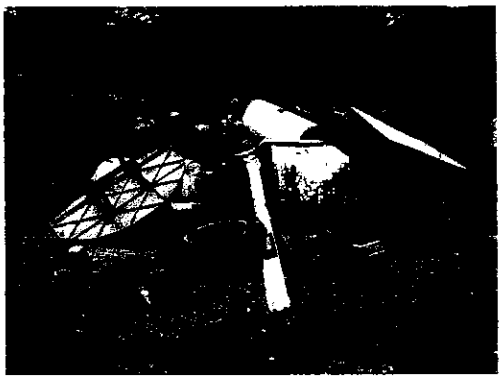


Fig 9: Piping should be pulled out of the wooded area and stacked on the yard for better housekeeping practices.
Fig 10: All unneeded scrap needs to be scraped out and disposed of properly.

Fig 11: The catch basin at the rear of the facility seems to be the only point of drainage for the whole yard. The basin is very laden with organic sediment and seems to be the low point of the yard. Because the outfall adjacent to the basin is so sediment logged water seems to just pond in this area.
Fig 12: The water that is discharging to this basin is sediment logged and has an oil sheen from the vehicles working throughout the yard.

Fig 13: The berm that was preventing water on the Service Center site from directly entering the drainage ditch was breached and sediment now blocks the conduit.
Fig 14: View of the whole outfall area for drainage off the site. Pollutants such as sediment and leachate were noted discharging from the site.

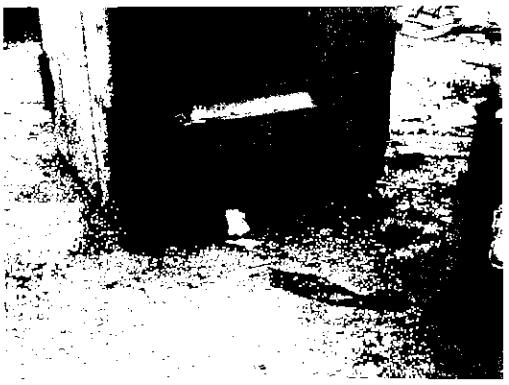


Fig 15: All tires need to be moved inside the storage building where the others are stored. Barrels need to be rinsed off before they can be stored outside. Once outside, they need to be flipped over or covered and capped.
Fig 16: This dumpster at the rear of the facility has a leak and needs to be replaced to prevent the discharge of dumpster juices.

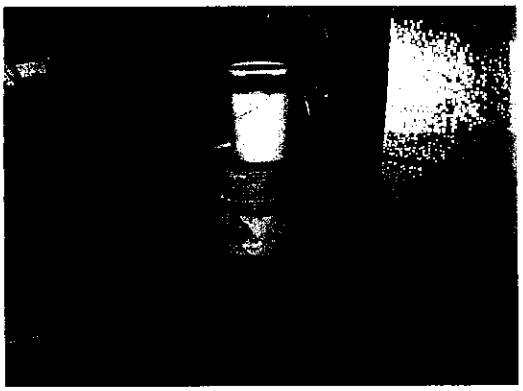


Fig 17: Weed killer stored inside the storage building may need additional storage and protection. Please refer to the interview worksheet for more information.

FIELD INSPECTION WORKSHEET

MS4 SWMP Evaluation

MS4 Maintenance Facility Field Inspection Worksheet

Permittee: City of Louisville Wilson Garage	
Address of facility: 1425 W. Main Rear, Louisville 44641	**Size of facility:**
Date of visit: 6/4/2010	**Time of visit:** 2:30 pm

Provide the name(s) and title(s) of permittee staff present during inspection	
Name	**Title**
Jim McBeath	***Director of Service Operations***

Evaluator Observations:	
SWPPP or stormwater plan	
Has the maintenance facility developed a SWPPP or stormwater plan?	**NO.** The City is required to develop a SWP3 for this facility similar to that of an Industrial SWP3. See Interview sheet for more information on this matter.
Does the plan include a site map, list of pollutant sources, BMPs, and maintenance procedures?	These are key components of the SWP3 and must be included in the document when it is produced.
Does the permittee conduct and document periodic inspections of the facility?	**NO.** The facility must be inspected for the implementation of storm water best management practices (BMPs) at a frequency specified in the SWP3. Ohio EPA recommends that the facility be inspected once per month. In addition, you must conduct a Comprehensive Site Evaluation annually.
Are storm drains labeled and free of debris?	The small storm drain inside the building on the Fire Department side was covered with some sort of yellow paint. Please keep drains free of debris and pollutants. It may be best to cap the drain altogether.
Vehicle maintenance, fueling and washing	
Are vehicle maintenance activities conducted in a designated place not exposed to stormwater?	No vehicle maintenance occurs at this site.
Are fueling stations properly designed with spill kits nearby?	No fueling station at this site.
Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer?	NO. There was evidence of vehicle washing on the Fire Departments side of the garage. If the floor drain is connected to the storm sewers this action is not permitted. The fire department must find another location to wash their trucks, where the wastewater can be collected and disposed of properly.
Material storage	
Are all materials that are potential stormwater contaminants stored under cover or in secondary containment?	On the City's side of the garage where vehicles are stored, no floor drains were found during the inspection. If one is found it should be capped for lack of a better purpose.
Hazardous waste management	
Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff?	No hazardous wastes are stored at this facility.

Waste management	
Are waste bins covered with waste properly disposed in containers?	There are no waste bins outside the building. Any waste bins inside the garage are not a threat to the MS4 system.
How is landscape waste stored?	No landscape waste stored at this site.
Spill response	
Does the facility have a spill response plan, and are spill kits readily available?	A spill response plan is a required component of the SWP3. Spill kits were not readily evident at this site. Be sure to locate spill kits where they are most likely to be needed, e.g., the maintenance shop.
Employee training	
What type of stormwater training do maintenance staffs receive?	See interview sheet.

Notes or additional information:

SWP3

As it stands, the Wilson Garage will require a SWP3 to be developed and implemented by June 2011. If the fire department ceases to wash trucks at this site and all the floor drains are caped the garage will qualify as no exposure and the facility will not require a SWP3 to be developed.

FIELD INSPECTION WORKSHEET

MS4 SWMP Evaluation

MS4 Maintenance Facility Field Inspection Worksheet

Permittee: City of Louisville WWTP	
Address of facility: 2301 Ravenna Road, Louisville 44641	**Size of facility:**
Date of visit: 6/4/2010	**Time of visit:** 2:45 pm
Provide the name(s) and title(s) of permittee staff present during inspection	
Name	**Title**
Jim McBeath	***Director of Service Operations***
Evaluator Observations:	
SWPPP or stormwater plan	
Has the maintenance facility developed a SWPPP or stormwater plan?	**NO.** This facility requires the City to develop and implement a Storm Water Pollution Prevention Plan (SWP3) to go along with their individual Permit with Parts IV, V, and VI for Industrial activity.
Does the plan include a site map, list of pollutant sources, BMPs, and maintenance procedures?	These are required components of an SWP3 and must be included in the plan once developed.
Does the permittee conduct and document periodic inspections of the facility?	**NO.** There are no inspection procedures in place at this time for the WWTP. This will need to be developed in the facilities SWP3.
Are storm drains labeled and free of debris?	Not labeled, but free of debris
Vehicle maintenance, fueling and washing	
Are vehicle maintenance activities conducted in a designated place not exposed to stormwater?	No vehicle maintenance at this facility, but other maintenance does occur, but inside. All interior floor drains are connected to the treatment system.
Are fueling stations properly designed with spill kits nearby?	**NO.** There are no fueling stations at this facility, but spill kits should be located near bulk liquid storage tanks in case of spills during the loading/unloading process.
Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer?	No vehicle washing occurs on site. Any rinsing of equipment is done inside the buildings where drains are directed back to the treatment plant.
Material storage	
Are all materials that are potential stormwater contaminants stored under cover or in secondary containment?	The soil stockpile is exposed to precipitation. Soil stockpiles should be tarped, encircled with silt fence or sediment filter sock, or vegetated. Please keep the pile fully tarped.
Hazardous waste management	
Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff?	Please be sure all used oil is labeled "Used Oil."
Waste management	
Are waste bins covered with waste properly disposed in containers?	All dumpsters need to be lidded, plugged and inspected for leaks on a regular basis.
How is landscape waste stored?	No landscape waste is stored on site.
Spill response	

Does the facility have a spill response plan, and are spill kits readily available?	**NO.** Spill response procedures must be provided in the SWP3 and employees must be trained on these procedures.
Employee training	
What type of stormwater training do maintenance staffs receive?	Storm water pollution prevention training must be provided to the staff of this facility. In addition to measures related to operations at the WWTP, staff should be trained on illicit discharge identification.

Notes or additional information:

The City is also in violation of Part IV of their NPDES Permit #3PD00033*HD for industrial activity pertaining to the Louisville WWTP for failure to develop a Storm Water Pollution Prevention Plan (SWP3). Please refer to the Interview Worksheet for information on how to develop a SWP3 for this facility.

Catch Basin Cleanings Disposal

The drying bed for the catch basin cleanings and street sweepings is located at the site. The City has set aside one of the sludge drying beds for these spoils. The bed is an acceptable drying method. No runoff is discharging from the area, and spoils are taken away to American Landfill when the bed is full. This will be a potential pollutant source that the city will have to include in their SWP3 for this facility.

INSPECTION PHOTOS
Louisville WWTP
City of Louisville

Photos Taken: June 14, 2010

Fig 1 & 2: Drying bed for catch basin cleanings and street sweeping spoils. Once dried the spoils are taken directly from this point to American Landfill.