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MAHONING STRUTHERS CITY OF STRUTHERS 3GQ00089 2009/07/23 MACPHERSON,  
LINDSIE

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State of Ohio Environmental Protection Agency

Northeast District Office

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Twinsburg, Ohio 44087

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

July 23, 2009

RE: MAHONING  
CITY OF STRUTHERS  
MUNICIPAL STORM WATER PROGRAM  
AUDIT FINDINGS

Mr. Rich DeLuca  
Storm Water Program Coordinator  
City of Struthers  
6 Elm Street  
Struthers, OH 44471

Dear Mr. DeLuca:

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) #3GQ00089\*BG and Ohio Administrative Code 3745-39.

On July 14, 2009, the Ohio EPA met with you and other representatives of the City of Struthers 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 obtain industrial storm water permit coverage for the composting facility.** This is a violation of Ohio Revised Code (ORC) 6111.04 and OAC 3745-39-04. Composting activities are categorized under Standard Industrial Classification (SIC) Code 2785. An NPDES permit is required to discharge storm water runoff from this facility. Ohio EPA does not have any record of storm water permit coverage for the compost yard at 100 S. Bridge Street. The City must obtain coverage under the Ohio EPA General Storm Water NPDES Permit for Industrial Activities #OHR000004 by submitting a Notice of Intent (NOI) and

Mr. Rich DeLuca  
City of Struthers  
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implementing a Storm Water Pollution Prevention Plan (SWP3) within 180 days of receiving permit coverage. Required elements of the SWP3 are described in the NPDES permit, which can be downloaded at:

[www.epa.state.oh.us/dsw/storm/stormform.html](http://www.epa.state.oh.us/dsw/storm/stormform.html).

Fact sheets which provide guidance on best management practices (BMPs) for various industrial "sectors" can be found on US EPA's Web site at:

<http://cfpub.epa.gov/npdes/stormwater/indust.cfm>.

- **Failure to list the municipal operations that are impacted by the operation and maintenance program in your SWMP.** This is a violation of Part III.B.6.d.i of the Ohio EPA General Storm Water NPDES Permit for Small MS4s #OHQ000002. The Storm Water Management Plan (SWMP) submitted in 2003 with your MS4 permit application was required to identify all municipal operations impacted by the MS4 program.
- **Failure to provide controls for reducing or eliminating the discharge of pollutants from all city owned areas in regards to salt storage pile and the compost facility.** This is a violation of Part III.B.6.d.iii.2 of the Small MS4 NPDES Permit #OHQ000002 and ORC 6111.04 and 6111.07. There must be some controls set up by the city to eliminate the discharge of runoff from the salt pile and the composting piles. The licensed composting facility will need to obtain coverage under the Ohio EPA General Storm Water NPDES Permit for Industrial Activities #OHR000004 and implement a Storm Water Pollution Prevention Plan (SWP3) with controls to prevent the discharge of leachate from compost piles.

**Deficiencies:**

- The City has not provided any storm water pollution prevention guidance materials to field staff that they can take out with them in the field. By making materials available to staff at the field level, implementation of storm water BMPs should improve.
- The City has not developed an efficient way to track the amount of salt used. More detailed tracking may allow the city to better identify inefficiencies in salt application. The city will need to quantify the amount and the materials used for deicing activities under NPDES Permit #OHQ000002 beginning with the 2009-2010 winter season.

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City of Struthers  
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- The City does not conduct regular inspections of storm water BMPs at the Street Department Facility. Please be aware that an inspection must be conducted at least once per year during the next permit cycle once a Storm Water Pollution Prevention Plan (SWP3) is developed. The SWP3 must be developed within 2 years.
- The city needs to assure contract language/agreements specify that storm water BMPs must be implemented by a third party, when said third party is relied upon to enact a BMP. Please be sure to add this language to any future requests for proposal or contracts you sign with third party service providers whose activities can create storm water pollution.

Please review my comments and provide me with a letter of response indicating the actions you will take to address my concerns. **Your response should be received no later than August 20, 2009.** Please note that this response does not replace the requirement to submit an Annual Report. Your annual report for 2009 will be due on April 1, 2010.

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

Sincerely,



Lindsie MacPherson  
Assistant to the District Engineer  
Division of Surface Water

LM/mt

cc: Terry P. Stocker, Mayor  
Ed Wiles, Safety Service Director

## Municipal Storm Water Program Evaluation

### MS4 Maintenance Component Worksheet

<b>Date of Evaluation</b>  July 14, 2009	<b>Instructions:</b> 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.	
<b>Evaluator Name, Title</b>  Lindsie MacPherson, Ohio EPA Assistant to the District Engineer		
<b>MS4 Permittee</b>  City of Struthers		
<b>Staff Interviewed</b>		
<b>Name</b>	<b>Department/Agency</b>	<b>Phone Number/Email</b>
Rich Deluca Stormwater Pollution Control Manager	City of Struthers/ WWTP	(330) 755-9847 WWP@CityofStruthers.com
Frank DeMarco	City of Struthers/ Roads Department (WWTP)	
Nick Jordan	City of Struthers/ WWTP	
Mark Ciccone Industrial Monitor	City of Struthers/ WWTP	
Bob Benson	City of Struthers/ Street Department	
Dan Sepesy Litter Control Coordinator	City of Struthers	(330) 755-2181 ext. #138 LitterControl@CityofStruthers.com

<b>MS4 Mapping</b>	
<b>Interview Questions</b>	<b>Response</b>
Outfalls and receiving waters mapped?	YES
Catch basins?	YES
Pipes, ditches, other conduits?	YES
Public stormwater facilities (BMPs)?	N/A
Private stormwater facilities (BMPs)?	N/A

<b>MS4 Mapping</b>			
<b>Interview Questions</b>		<b>Response</b>	
How are maps used (i.e. tracking illicit discharges)?		The City uses the map as a reference when conducting maintenance on the MS4 and to help keep records of such maintenance at the WWTP.	
<b>Applicable Documents</b>		<b>Reviewed</b>	<b>Obtained</b>
Map(s) of MS4 system		YES	YES

<b>Notes</b>
<p><b>MS4 Mapping</b> Mapping obligations under the NPDES Permit #OHQ000001 have been met. The City has also mapped catch basins, pipes and ditches in compliance with the requirements for the NPDES Permit #OHQ000002. The mapping was done internally with the help of Western Reserve Land Consultants Inc. Please note that at this time the City does not have any public or private stormwater facilities, but when any WQ BMPs (including extended detention ponds, retention basins, vegetative filter strips, enhanced swales, infiltration basins, sand filters, permeable pavement, green roofs and bioretention cells) are constructed in the future they will need to be placed on the MS4 map.</p> <p><b>Illicit Discharge Detection</b> The City has developed its own program for surveying and inspecting the city's outfalls. The Water Pollution Control employees at the WWTP are responsible for inspecting and performing dry weather screening on all the City's outfalls. The crews fill out an outfall inspection report and from there maintenance is conducted as needed. All outfalls are tracked electronically using a GPS system. A copy of an example of an outfall inspection report was received by the Ohio EPA and the end results of the maintenance and cleaning were viewed in before/ after photographs.</p> <p>Because the City of Struthers completed dry weather screening of all MS4 outfalls under the first NPDES permit term, an additional round of dry weather screening under NPDES permit #OHQ000002 is not required. Rather, the City needs to focus on evaluating the sources of dry weather flows and eliminating those that are considered illicit discharges. For illicit discharges from residential septic systems, please read Part III.B.3.e of the Ohio EPA General Storm Water NPDES Permit for Small MS4s #OHQ000002 for expectations to address these sources.</p>

<b>Catch Basin Cleaning</b>	
<b>Interview Question</b>	<b>Response</b>
Schedule established for inspections and cleaning?	<b>YES</b>  The city conducts catch basin cleanings in the summer months. Low lying areas are inspected and cleaned annually. All the basins in the city are hit every 5 years.
Is cleaning and maintenance of catch basins tracked:	<b>YES</b>  The road crews keep a log in the vac truck of all catch basins inspected and cleaned. The date, basins inspected/ cleaned, and amount of material removed are recorded.
How are spoils materials disposed of?	See Notes.

Are storm drain pipes inspected?  Proactive or only in response to blockage event?	<b>YES</b> The city has a camera system to inspect sanitary and storm pipes. Storm pipe inspections are proactive, but Mr. Frank DeMarco has a plan in place to start improving these inspections. He wants to start at one end of the city and use the MS4 map to highlight the pipes televised to better organize the process.		
<b>Applicable Documents</b>		<b>Reviewed</b>	<b>Obtained</b>
List of active municipal construction projects		NO	NO

Notes
<p><b>Catch Basin Cleaning</b> The city uses a vac truck to conduct catch basin cleanings in the summer months. Low lying areas are targeted annually, and the rest of the city's catch basins are inspected and cleaned on a 5 year rotation. Before storm events the crews will go out and check the main grates to avoid flooding and overflows. Records are kept in a log book inside the vac truck. Crews keep track of the dates of inspections/ cleanings, the locations of the catch basins, and the amount removed. The records are compiled into a Maintenance Report once a month. The Ohio EPA received a copy of this report from 2007 and 2008. The records for 2009 have not been inputted into a report because of computer problems, but as soon as the problems clear, the information will be entered.</p> <p><b>Disposal of Catch Basin Cleanings:</b> The spoils are taken to a designated, concrete dump site at the Pump Station at 55 S. Bridge Street. The spoils are dumped into a dumpster within the dewatering pit. The bottom of the dumpster is designed with ¼ inch pious holes to dewater the spoils as well as a 4 inch hose where water is drained to the WWTP. The dumpster is then emptied as necessary.</p> <p><b>Municipal Construction Projects:</b> The city has no projects at this time that require a NPDES construction general permit (CGP). Because the city is so built up, the majority of their projects are small routine maintenance activities and involve the disturbance of less than five acres of land. At this point the city of Struthers is working on a culvert replacement on Spring Street, check dam construction on Upper Spring Street, and will be starting another culvert replacement on 5<sup>th</sup> Street soon.</p>

<b>Stormwater Management Facilities Operation and Maintenance</b>	
<b>Interview Questions</b>	<b>Response</b>
Public facilities inspected?	N/A The city does not own any stormwater facilities.
Private facilities inspected?	N/A There are no private stormwater facilities in Struthers.
Checklist used for inspections?	N/A
Have maintenance standards and procedures been established for these facilities?	<b>YES</b> The city has passed their post-construction ordinance for the long-term maintenance of such facilities.

Stormwater Management Facilities Operation and Maintenance		
Interview Questions	Response	
How is maintenance prioritized? Is data evaluated to target maintenance resources?	N/A	
Applicable Documents	Reviewed	Obtained
Inspection checklist	N/A	N/A

Notes
<p><b>Stormwater Facilities:</b>            Due to the absence of development disturbing 1 or more acre since 2003, there are no stormwater management facilities for water quality or quantity in Struthers. The city is expecting the development of 2 water quality ponds near a new development site and the soccer dome. Both of these facilities will be monitored for long-term maintenance because of the passage of the post-construction ordinance. The City will have MS Consultants draft their long-term maintenance plan, including an inspection checklist, when it is necessary for them to do so.</p> <p><b>Repairing Waterways:</b>            The city of Struthers has placed a lot of emphasis on maintaining and restoring their waterways. There is a major problem with illegal dumping throughout the city, and Rich DeLuca has been working on raising awareness using public education on illegal dumping. Water pollution control crews are dedicated to the remediation of their waterways and have documented their progress using before and after photos, which also help with public education. The city has also stressed the use of rain gardens to help increase the water quality of runoff entering the storm sewers.</p>

Road Maintenance	
Interview Questions	Response
Streets regularly swept?	<b>YES</b>
Frequency:	The whole city is swept within a 4 week period starting in the beginning of every April. The city is then spot treated throughout the year after heavy storms and in low lying areas.
Frequency based on water quality factors (e.g. proximity to streams)?	<b>YES</b> After storms, low lying areas near the river are targeted for street sweeping.
How are spoils disposed of?	Street sweeping spoils are now taken to the dewatering pit located at the pump station for proper disposal. From here the dumpster is taken to the landfill.
Does the community collect road kill?	<b>YES</b>
What do they do with the carcasses?	All carcasses are taken directly to BFI.
Does the community have a leaf collection program?	<b>YES</b>
What do they do with the collected leaves?	Residents are given biodegradable bags for their leaves which are picked up starting when the first leaves fall up to the first snow fall. The city will also go around with the vac truck

<b>Road Maintenance</b>			
<b>Interview Questions</b>	<b>Response</b>		
	to clear leaves from the streets and park. All leaves are taken to the city of Struthers' licensed class IV Composting Facility located at 100 S Bridge Street.		
BMPs used during road maintenance activities?  Describe types of road maintenance conducted by community staff and the BMPs used	<p style="text-align: center;"><b>YES</b></p> <p>The city outsources for most of their road projects, but they do conduct small projects such as pothole repair, catch basin rebuilding, and other minor repairs.</p> <p>The city sweeps streets after larger road projects. A soap substance is used as a detack for asphalt projects, which can result in the discharge of wastewater to the MS4. Control measures must be implemented to prevent the discharge of soaps or other chemical anti-tacking agents to the MS4. This may include blocking storm drains to allow for the collection of wash-water for disposal to the sanitary sewer or using alternative anti-tacking measures.</p>		
BMP guidance available to field staff?	<p style="text-align: center;"><b>NO</b></p> <p>The city could look at turning BMP information into a booklet or flip chart for the crews.</p>		
Deicers used by MS4?	<p style="text-align: center;"><b>YES</b></p> <p>The city uses road salt and slag with a 2 to 1 slag to salt ratio.</p>		
Type and amount of deicer and additives tracked?  What measures are being taken to minimize the application of deicers?	<p style="text-align: center;"><b>YES</b></p> <p>The city tracks salt using an end summary of salt/ slag purchased minus salt/ slag used.</p> <p>The city will plow streets first and then use salt when required. The workers will spot treat flat roads so they get a lighter salting.</p>		
Sand/salt swept up after application?  How soon?	Salt is stored at the CASTLO industrial park on a brown field. The salt is inside and all loading and unloading occurs inside. There is a storm drain next to the salt and slag mix pile which needs protection.		
<b>Applicable Documents</b>		<b>Reviewed</b>	<b>Obtained</b>
BMP guidance		<b>NO</b>	<b>NO</b>
Street sweeping records		<b>YES</b>	<b>YES</b>
Deicer application records		<b>NO</b>	<b>NO</b>

**Notes**

**Street Sweeping**

The street crews sweep the entire city of Struthers in a 4 week time frame starting at the beginning of every April. The city is split into wards and swept in sections to verify all streets have been hit. A daily log is kept of the amount of debris collected in cubic yards and where it is disposed, which is in the dumpster at the pump station.

**Road Deicing**

The City of Struthers uses a salt and slag mix to deice their roads. Unweathered slag or newly crushed slag produces a leachate harmful to aquatic life when it comes in contact with storm water. The discharge of this leachate to the MS4 or directly to the Mahoning River would constitute an unauthorized discharge of wastewater. Further, even if the slag is properly weathered, applying it to roadways will increase the discharge of total suspended solids from your MS4, which may subsequently require you to implement control measures such as catch basin inserts or more frequent street sweeping to prevent. Other alternatives can be used in place of slag, such as brine, beet juice or a product called Ice Ban but they should be applied as part of a sensible salting program.

Salt usage is tracked using an end of the year summary of product purchased and used, but this document was not presented to the Ohio EPA. The City has not come up with a practical way to track the amount of salt used per storm event. They know the number of trucks that go out, so they may be able to track quantity using truck loads in order to reach target reduction goals per storm event. More detailed tracking of this information may allow the city to better identify inefficiencies in salt application. The city will need to quantify the amount of salt used and the materials used for NPDES Permit #OHQ000002 beginning with the 2009-2010 winter season.

The salt for the city of Struthers, along with a couple of surrounding cities, is stored at the CASTLO industrial park on a brown field. It is recommended that the city find a new practice for storing their salt. While the salt remains at this site, certain BMPs must be implemented to control the runoff from the salt/ slag piles. The holes in the roofed area are allowing rain to reach the piles and creating a runoff. These stockpiles need to be covered, with tarp for example, and the storm drain adjacent to the piles needs to be cleaned and protected from the salt with inlet protection.

**Composting Facility**

See notes in Facilities Operation & Maintenance section.

<b>Flood Management</b>			
<b>Interview Questions</b>		<b>Response</b>	
Inventory of flood management structures completed?		N/A	
Structures been assessed for stormwater retrofit?		N/A	
New structures include water quality considerations?		N/A	
<b>Applicable Documents</b>		<b>Reviewed</b>	<b>Obtained</b>
Inventory		N/A	N/A

**Notes**

The city does not operate any flood management structures. There is a spillway operated by Aqua Ohio and a pond near Yellow Creek maintained by the Mahoning County Metro Parks.

<b>Facilities Operation &amp; Maintenance</b>																													
<b>Interview Questions</b>	<b>Response</b>																												
<p>Inventory of MS4 facilities complete (i.e. facilities owned and operated by the MS4)?</p> <p><b>Types of facilities included</b>  <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"> <li>• Landfills Type: _____</li> <li>• Solid Waste Transfer Stations</li> <li>• Composting Operations <ul style="list-style-type: none"> <li>✓ No discharge of leachate permitted</li> </ul> <p style="text-align: center;"><b>City of Struthers Compost Facility</b>  <b>100 S Bridge St., Struthers, OH</b></p> </li> <li>• Airports</li> <li>• Shipping Ports</li> <li>• Steam Electric Power Plants</li> <li>• Wastewater Treatment Plants ≥ 1 MGD  <b>530 Lowellville Rd., Struthers, OH</b></li> </ul> <p><i>These do not need their own permit:</i></p> <ul style="list-style-type: none"> <li>• Impound Lots</li> <li>• Leaf Collection Yards <ul style="list-style-type: none"> <li>✓ No discharge of leafate permitted</li> </ul> </li> <li>• Maintenance Yards <ul style="list-style-type: none"> <li>➤ How many do they operate? <u>  1  </u></li> <li>➤ List facility names/locations:  <b>6 Elm St., Struthers, OH</b>  (Street Dept.)</li> </ul> </li> <li>• Parks <ul style="list-style-type: none"> <li>➤ How many in UA? <u>  1  </u></li> <li>➤ List facility names/locations:  <b>156 Smithville Rd., Struthers, OH</b>  (ball fields, pavilion, playground, indoor building, picnic area)  <b>No cemeteries</b></li> </ul> </li> <li>• Parking Lots <ul style="list-style-type: none"> <li>➤ How many do they operate? <u>  2  </u></li> <li>➤ List facility name/locations:</li> </ul> </li> <li>• Bus Terminals</li> </ul>	<p style="text-align: center;"><b>NO</b></p> <p>The city is working on site mapping for their Pollution Prevention Plan, but a verbal inventory was given.</p> <table border="1" style="width: 100%; margin-top: 20px;"> <thead> <tr> <th style="text-align: center;"><u>Response</u></th> <th style="text-align: center;"><u>SWP3 Developed?</u></th> </tr> </thead> <tbody> <tr> <td style="text-align: center;"><b>NO</b></td> <td style="text-align: center;">N/A since do not operate</td> </tr> <tr> <td style="text-align: center;"><b>NO</b></td> <td style="text-align: center;">N/A since do not operate</td> </tr> <tr> <td style="text-align: center;"><b>YES</b></td> <td style="text-align: center;"><b>NO</b></td> </tr> <tr> <td style="text-align: center;"><b>NO</b></td> <td style="text-align: center;">N/A since do not operate</td> </tr> <tr> <td style="text-align: center;"><b>NO</b></td> <td style="text-align: center;">N/A since do not operate</td> </tr> <tr> <td style="text-align: center;"><b>NO</b></td> <td style="text-align: center;">N/A since do not operate</td> </tr> <tr> <td style="text-align: center;"><b>YES</b></td> <td style="text-align: center;"><b>YES</b></td> </tr> <tr> <td style="text-align: center;"><b>NO</b></td> <td style="text-align: center;">N/A since do not operate</td> </tr> <tr> <td style="text-align: center;"><b>NO</b></td> <td style="text-align: center;">N/A since do not operate</td> </tr> <tr> <td style="text-align: center;"><b>YES</b></td> <td style="text-align: center;"><b>NO.</b> To be included in maintenance facility SWP3</td> </tr> <tr> <td style="text-align: center;"><b>YES</b></td> <td style="text-align: center;">N/A</td> </tr> <tr> <td style="text-align: center;"><b>YES</b></td> <td style="text-align: center;">N/A</td> </tr> <tr> <td style="text-align: center;"><b>NO</b></td> <td style="text-align: center;">N/A since do not operate</td> </tr> </tbody> </table>	<u>Response</u>	<u>SWP3 Developed?</u>	<b>NO</b>	N/A since do not operate	<b>NO</b>	N/A since do not operate	<b>YES</b>	<b>NO</b>	<b>NO</b>	N/A since do not operate	<b>NO</b>	N/A since do not operate	<b>NO</b>	N/A since do not operate	<b>YES</b>	<b>YES</b>	<b>NO</b>	N/A since do not operate	<b>NO</b>	N/A since do not operate	<b>YES</b>	<b>NO.</b> To be included in maintenance facility SWP3	<b>YES</b>	N/A	<b>YES</b>	N/A	<b>NO</b>	N/A since do not operate
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<b>YES</b>	<b>NO.</b> To be included in maintenance facility SWP3				
<ul style="list-style-type: none"> <li>• Vehicle Maintenance Garages               <ul style="list-style-type: none"> <li>➢ How many do they operate? <u>  1  </u></li> <li>➢ List facility name/locations: (same as Maintenance facility)</li> </ul> </li> </ul>					
Facilities inspected?	<b>NO</b>				
Frequency:	No inspection is performed at this time.				
Checklist used?	<b>NO</b>				
Staff which perform the inspections (department or agency):	Rich DeLuca				
Is there a designated stormwater contact person for each facility?	Rich DeLuca				
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?:	There is no real program for disciplining staff. The city needs to determine disciplinary procedures for employees that fail to follow policies designed to prevent storm water pollution.				
Parking lots owned/operated by the permittee swept?	<b>YES</b>				
Frequency?	Municipal lots are swept 5 times a year.				
Do you have any combined sewer systems?	<b>NO</b>				
If yes, do you have any combined sewer overflows?	<b>N/A</b>				
<ul style="list-style-type: none"> <li>➢ How many? _____</li> <li>➢ Do you track frequency and volume?</li> </ul>					
Are you aware of any illicit cross connections between your sanitary sewer and MS4?	<b>NO</b>				
	A cross connection was found 2 years ago and eliminated immediately.				
If so, what is your plan to eliminate this illicit discharge?	The city will camera the lines for indications of cross connections and fix the problem or hire a contractor to seal the connection.				
Have you investigated the extent of infiltration and inflow into storm sewer system?	<b>YES</b>				
What methods have been used to conduct this investigation?	The city proactively cameras the lines looking for cracks and other problems. Frank DeMarco has plans to start recording his cameraing on a map of the city's MS4 to better track those pipes inspected.				

Facilities Operation & Maintenance			
Interview Questions		Response	
What are your plans to repair and eliminate this source of illicit discharge?		The city is also in the process of slip lining their sanitary system.	
Sewer spill and cleanup procedures in place?		YES The city has a Spill/Release Incident Reporting process.	
Applicable Documents		Reviewed	Obtained
Facility inventory		NO	NO
Facility SWPPP		NO	NO

Notes
<p><b>Facility Inventory</b></p> <p>The City has not compiled an inventory of all MS4 facilities. This inventory was required in the NPDES permit #OHQ000001 and should be in the City's SWMP. The inventory should be kept up to date in the SWMP and easily accessed.</p> <p>The City is also in violation of Ohio Revised Code 6111.04 and Ohio Administrative Code 3745-39-04 for failure to obtain NPDES permit coverage for facilities that discharge storm water runoff associated with industrial activity. There is no record of an NPDES permit for stormwater discharges associated with industrial activity and no Storm Water Pollution Prevention Plan (SWP3) developed for the following facility:</p> <p>Struthers Compost Facility 100 S Bridge St. Struthers, OH</p> <p>The city must submit a notice of intent (NOI) for the Ohio EPA General Storm Water NPDES Permit for Industrial Activities #OHR000004. A SWP3 will also need to be developed and implemented for this facility within 180 days of submitting the NOI.</p> <p>Further, the Ohio EPA General Storm Water NPDES Permit for Small MS4s #OHQ000002 requires you to develop an SWP3 for the following facility:</p> <p>Maintenance Facility (Street Dept.) 6 Elm St. Struthers, OH</p> <p>The SWP3 must be developed and implemented within 2 years, i.e., by June 2011.</p> <p>The above facility must be inspected at least once per year and a record of the 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 stormwater contact person for the facility.</p> <p><b>Composting Facility</b></p> <p>The city is not permitted to discharge any sort of leachate or leafate; therefore, the compost facility must be equipped with controls to contain runoff. Most composting facilities will segregate leachate from storm water runoff and collect it for reuse using berms around compost piles. Compost piles are</p>

<b>Notes</b>	
<p>placed in windrows. Leachate is collected and recirculated onto compost piles to aid in the composting process. One example discussed on site, was to use an earthen berm with some sort of impermeable clay to keep runoff from discharging off site. The berm should be seeded and placed along the contour lines of the area. Excess leachate can be pumped out with the vac truck when necessary and taken to the dump site at the WWTP or transported to a sanitary sewer connection. Any disturbed areas should be reseeded and all stockpiles of potential pollutants should be removed from the site.</p>	

<b>Pesticides, Herbicides &amp; Fertilizers</b>			
<b>Interview Questions</b>		<b>Response</b>	
Certified applicators used?		<b>YES</b>	
		Pat Carano is a contracted, certified applicator.	
Integrated Pest Management (IPM) practices used?		<b>NO</b>	
Storage location of pesticides, herbicides, and fertilizers:		All weed killer and fertilizers are stored inside at the Pump Station on 55 S Bridge St. There are no storm drains in the room.	
BMPs used during application:		The city considers weather conditions before application such as wind and rain. The city is also starting to certify their staff in the application process.	
Fertilizer/pesticide application plan utilized?		<b>NO</b>	
<b>Applicable Documents</b>		<b>Reviewed</b>	<b>Obtained</b>
Fertilizer/pesticide application plan		<b>NO</b>	<b>NO</b>

<b>Notes</b>	
<p>The City sprays weed killer and contracts all other fertilization out to Pat Carano. City staffs who are trained applicators are the only employees permitted to spray for weeds. There is no plan for application. Fertilizer is only applied twice a year and weed killer is spot sprayed.</p>	

<b>Standards, BMPs, &amp; Outreach</b>	
<b>Interview Questions</b>	<b>Response</b>
BMP technical guidance document available to maintenance staff?	<b>NO</b>
MS4 use contractual staff to complete MS4 maintenance activities?	<b>YES</b>
BMP guidance materials provided to contracted staff?	<b>NO</b>
Requirement to consider stormwater impacts and utilize appropriate BMPs in contracts?	<b>NO</b>
Materials used to educate the public regarding stormwater impacts on MS4 property (if applicable, i.e. public spaces):	<p>Pet waste: There are pet waste stations in the park.</p> <p>Litter reduction: There are 9 trash cans throughout the park and 43 throughout the entire city that are checked daily. Residents are encouraged to use these bins.</p>

<b>Standards, BMPs, &amp; Outreach</b>			
<b>Interview Questions</b>		<b>Response</b>	
<b>Applicable Documents</b>		<b>Reviewed</b>	<b>Obtained</b>
BMP manual or guidance document		NO	NO
Contract language for MS4 operation and maintenance activities		NO	NO

<b>Notes</b>
<p><b>Contracted Services and Guidance</b></p> <p>The city contracts out all street repaving and any large scale projects. The submittal of a SWP3 with any project contracted out is required by the City of Struthers.</p> <p>It is the city's obligation to assure contract language/agreements specify that storm water BMPs must be implemented by the third party. Please be sure to add this language to any future requests for proposal or contracts you sign with third party service providers whose activities can create storm water pollution. The contractor should be held accountable for their stormwater to comply with the stormwater responsibilities of the City. Periodic inspection of their operations in your community is also suggested.</p>

<b>Staff Education and Training</b>			
<b>Interview Questions</b>		<b>Response</b>	
Staff trained to identify potential storm water pollution sources which would result in illicit discharges?		<p><b>YES</b></p> <p>Some of the staff has attended a stormwater PPGH seminar held by the Ohio EPA.</p> <p>Staff watched a Pollution Prevention and Good Housekeeping video and took the test in 2008. Training for 2009 is in development.</p>	
Materials used to train staff:		<p>The test each employee took and the material covered in the video is recorded.</p> <p>There are also sign-in sheets for each training event.</p>	
<b>Applicable Documents</b>		<b>Reviewed</b>	<b>Obtained</b>
Training materials		YES	YES

<b>Notes</b>
<p>The following materials may help with the training development:</p> <p>Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) as well as ODOT's Local Technical Assistance Program (LTAP) have provided a number of training opportunities on pollution prevention and good housekeeping for municipal operations over the past several years. Materials presented at OCAPP's session are archived on the internet at: <a href="http://www.epa.state.oh.us/ocapp/storm_water.html">www.epa.state.oh.us/ocapp/storm_water.html</a> and can be used to provide training to your staff. In addition, the Cuyahoga County Board of Health (CCBH) through the NE Ohio Storm Water Training Council is planning several pollution prevention workshops this August. Please contact Laura Travers at (216) 201-2001 at the CCBH for further information. The Center for Watershed Protection also has information available for training in their Manual #9: Municipal Pollution Prevention/Good Housekeeping Practices.</p>

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

<b>Permittee: City of Struthers</b>	
<b>Address of facility: 6 Elm St., Struthers, OH Street Dept. Garage</b>	<b>Size of facility: Unknown</b>
<b>Date of visit: July 14, 2009</b>	<b>Time of visit: 12:30 p.m.</b>
<b>Provide the name(s) and title(s) of permittee staff present during inspection</b>	
<b>Name</b>	<b>Title</b>
<b>Rich DeLuca</b>	<b>Stormwater Coordinator</b>
<b>Bob Benson</b>	<b>Street Dept. Asst. Foreman</b>
<b>Evaluator Observations:</b>	
<b>SWPPP or stormwater plan</b>	
Has the maintenance facility developed a SWPPP or stormwater plan?	<b>NO. Facility needs to develop and implement the equivalent of an industrial SWP3.</b>
Does the plan include a site map, list of pollutant sources, BMPs, and maintenance procedures?	<b>Does not exist.</b>
Does the permittee conduct and document periodic inspections of the facility?	<b>No formal inspection for storm water BMPs.</b>
Are storm drains labeled and free of debris?	<b>YES. All grates are labeled, but need to be freed of debris.</b>
<b>Vehicle maintenance, fueling and washing</b>	
Are vehicle maintenance activities conducted in a designated place not exposed to stormwater?	<b>YES. All drains in the maintenance building lead to the sanitary system. There is a sump in the building and the WWTP pumps this out twice a year and as needed.</b>
Are fueling stations properly designed with spill kits nearby?	<b>NO. The fueling station is undercover but there is no spill kit nearby. A spill will need to be placed adjacent to the pump. There is also no emergency shot-off button or break away hoses.</b>
Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer?	<b>YES. All vehicles are washed inside the buildings where the runoff is collected in the sump or goes through sanitary.</b>
<b>Material storage</b>	
Are all materials that are potential stormwater contaminants stored under cover or in secondary containment?	<b>All drums have been placed in secondary containment. Any liquid recyclable needs to be stored inside until pick-up.</b>
<b>Hazardous waste management</b>	
Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff?	<b>Used oil drums need to be labeled "Used Oil." The old degreaser drum should be disposed of as soon as possible.</b>
<b>Waste management</b>	
Are waste bins covered with waste properly disposed in containers?	<b>YES. All recycling bins and dumpsters are covered.</b>
How is landscape waste stored?	<b>The facility does not create landscape waste. All grass is mulched.</b>
<b>Spill response</b>	
Does the facility have a spill response plan, and are spill kits readily available?	<b>YES. There is a spill kit in the building that is clearly labeled.</b>
<b>Employee training</b>	
What type of stormwater training does maintenance staff receive?	<b>See Interview.</b>

**Notes or additional information:**

**Street Department**

The storm drain at the base of the building's drive should be protected with inlet protection, such as the inserts the City has placed on some of their other storm drains.

**City of Struthers MS4 Program Audit**

**Municipal Operation Photos**

**Street Dept. Building**

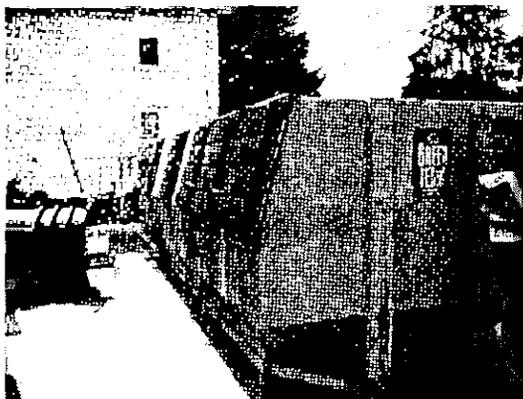
Location: 6 Elm St.  
Date Photos Taken: July 14, 2009  
Taken by: Ken Safranek



**Fig 1 (LEFT):** The covered fueling station at the side of the street department building. The facility is required to have a spill kit next to the fueling station in order to protect the storm drain down the drive in case of a spill.



**Fig 2 (RIGHT):** A good example of secondary containment used for drum storage within the building.



**Fig 3 (LEFT):** There is a concrete area set aside for storage on the opposite side of the building from the fueling station. There is also a recycling bin with is covered and emptied regularly.

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

<b>Permittee: City of Struthers</b>	
<b>Address of facility: 55 S Bridge St., Struthers, OH Pump Station</b>	<b>Size of facility: Unknown</b>
<b>Date of visit: July 14, 2009</b>	<b>Time of visit: 1:15 p.m.</b>
<b>Provide the name(s) and title(s) of permittee staff present during inspection</b>	
<b>Name</b>	<b>Title</b>
<i>Rich DeLuca</i>	<i>Stormwater Coordinator</i>
<i>Frank Demarco</i>	
<i>Nick Jordan</i>	
<b>Evaluator Observations:</b>	
<b>SWPPP or stormwater plan</b>	
Has the maintenance facility developed a SWPPP or stormwater plan?	<b>Not required.</b>
Does the plan include a site map, list of pollutant sources, BMPs, and maintenance procedures?	<b>N/A.</b>
Does the permittee conduct and document periodic inspections of the facility?	<b>NO.</b>
Are storm drains labeled and free of debris?	<b>All grates are labeled, but the drains could use a cleaning.</b>
<b>Vehicle maintenance, fueling and washing</b>	
Are vehicle maintenance activities conducted in a designated place not exposed to stormwater?	<b>No vehicle maintenance is conducted on-site.</b>
Are fueling stations properly designed with spill kits nearby?	<b>N/A. No fueling stations on-site.</b>
Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer?	<b>No vehicles are washed on site. All washing is conducted indoors at the WWTP or in the street dept. building.</b>
<b>Material storage</b>	
Are all materials that are potential stormwater contaminants stored under cover or in secondary containment?	<b>All materials are stored inside where there are no storm drains.</b>
<b>Hazardous waste management</b>	
Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff?	<b>Weed Killer is stored inside where there are no drains.</b>
<b>Waste management</b>	
Are waste bins covered with waste properly disposed in containers?	<b>The dumpster at the entrance of the pump station needs to be inspected regularly for leaks and should be lined.</b>
How is landscape waste stored?	<b>No landscape waste collected.</b>
<b>Spill response</b>	
Does the facility have a spill response plan, and are spill kits readily available?	<b>Yes the facility has a spill response plan.</b>
<b>Employee training</b>	
What type of stormwater training does maintenance staff receive?	<b>See Interview.</b>

**Notes or additional information:**

**Dewatering Pit**

The city takes all catch basin cleanings and street sweepings to this site. The spoils are placed in the dumpster shown below. Here the spoils are dewatered using a hose in the back to pump out water and a drain connected to the WWTP in the front. The dumpster is emptied when full and dry. This cement dump site was installed a year and a half ago and has been working nicely for the city.

**Pole Barn Construction**

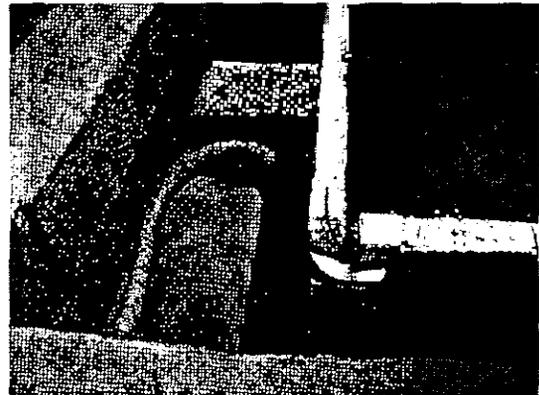
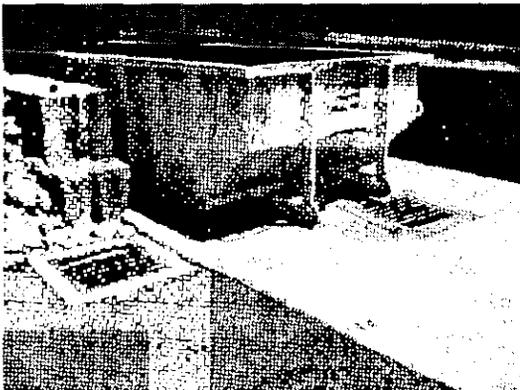
The city is in the process of constructing a pole barn on this site for cold storage. A small runoff of construction dirt was noted. The city should be sure construction BMPs are being implemented by their contracted workers.

**City of Struthers MS4 Program Audit**

**Municipal Operation Photos**

**Pump Station**

Location: 55 S Bridge St.  
Date Photos Taken: July 14, 2009  
Taken by: Ken Safranek

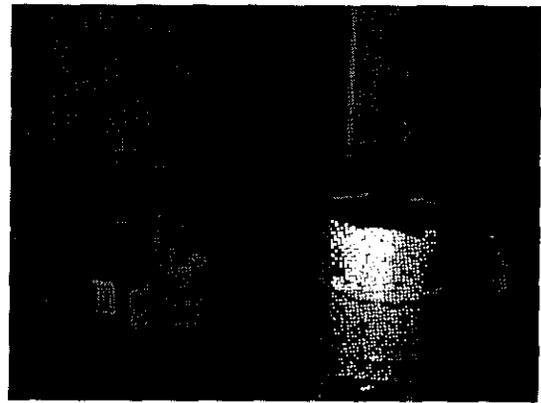


**Fig 1 (LEFT):** The dewatering pit area. The drain on the right, below the dumpster, leads to the WWPT. There is a curb and then the drain on the left is a storm drain.

**Fig 2 (RIGHT):** The view of the back of the dewatering pit. The hose used to dewater the spoils in the dumpster can be seen here.



**Fig 3 (LEFT):** The city is in the process of constructing a pole barn for cold storage. There are no sediment controls being implemented at this site, and the city needs to be sure contracted workers are responsible for executing such BMPs.



**Fig 4 (RIGHT):** Fertilizers are stored inside where there are no drains.

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

<b>Permittee: City of Struthers</b>	
<b>Address of facility: 100 S Bridge St., Struthers, OH Compost Facility</b>	<b>Size of facility: Unknown</b>
<b>Date of visit: July 14, 2009</b>	<b>Time of visit: 1:45 p.m.</b>
<b>Provide the name(s) and title(s) of permittee staff present during inspection</b>	
<b>Name</b>	<b>Title</b>
<i>Rich DeLuca</i>	<i>Stormwater Coordinator</i>
<i>Frank DeMarco</i>	
<i>Nick Jordan</i>	
<b>Evaluator Observations:</b>	
<b>SWPPP or stormwater plan</b>	
Has the maintenance facility developed a SWPPP or stormwater plan?	<b>NO. The City needs to develop and implement an industrial SWP3 for this facility.</b>
Does the plan include a site map, list of pollutant sources, BMPs, and maintenance procedures?	<b>Does not exist.</b>
Does the permittee conduct and document periodic inspections of the facility?	<b>No formal inspection for stormwater BMPs.</b>
Are storm drains labeled and free of debris?	<b>There are no drains on-site.</b>
<b>Vehicle maintenance, fueling and washing</b>	
Are vehicle maintenance activities conducted in a designated place not exposed to stormwater?	<b>NO vehicle maintenance occurs at this site.</b>
Are fueling stations properly designed with spill kits nearby?	<b>N/A. No fueling stations are present.</b>
Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer?	<b>No vehicle washing is conducted onsite.</b>
<b>Material storage</b>	
Are all materials that are potential stormwater contaminants stored under cover or in secondary containment?	<b>The stockpiles along the sides of the facility need to be cleaned up immediately.</b>
<b>Hazardous waste management</b>	
Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff?	<b>The city is not authorized to discharge any sort of leachate. See Notes.</b>
<b>Waste management</b>	
Are waste bins covered with waste properly disposed in containers?	<b>No waste bins on site.</b>
How is landscape waste stored?	<b>City does not produce landscape waste at this facility.</b>
<b>Spill response</b>	
Does the facility have a spill response plan, and are spill kits readily available?	<b>No spill response plan for site.</b>
<b>Employee training</b>	
What type of stormwater training does maintenance staff receive?	<b>See Interview.</b>
<b>Notes or additional information:</b>	
<p><b>Composting Operation</b>  The city is not permitted to discharge any sort of leachate or leafate; therefore, the compost facility must be equipped with controls to contain runoff. Most composting facilities will segregate leachate from storm water runoff and collect it for reuse using berms around compost piles. Compost piles are placed in windrows. Leachate is collected and recirculated onto compost piles to aid in the composting process. One example discussed on site, was to use an earthen</p>	

berm with some sort of impermeable clay to keep runoff from discharging off site. The berm should be seeded and placed along the contour lines of the area. Excess leachate can be pumped out with the vac truck when necessary and taken to the dump site at the WWTP. Any disturbed areas should be reseeded and all stockpiles of potential pollutants should be removed from the site.

## City of Struthers MS4 Program Audit

### Municipal Operation Photos

#### Compost Facility

Location: 100 S Bridge St.  
Date Photos Taken: July 14, 2009  
Taken by: Ken Safranek



**Fig 1 (LEFT):** Chip pile on the edge of the facility needs to be equipped with controls, such as silt fencing, to prevent pollutants from running off site.



**Fig 2 (RIGHT):** Windrow of compost with no controls. The city may want to consider using a horseshoe shape for the pile to better control and collect runoff.



**Fig3 (LEFT):** Excess stockpiles should be removed from this facility or stored using better controls.



**Fig 4 (RIGHT):** Biodegradable bags passed out to residents for leaf collection and taken to the compost facility.

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

<b>Permittee: City of Struthers</b>	
<b>Address of facility: CASTLO Industrial Park Salt Storage</b>	<b>Size of facility: Unknown</b>
<b>Date of visit: July 14, 2009</b>	<b>Time of visit: 1:30 p.m.</b>
<b>Provide the name(s) and title(s) of permittee staff present during inspection</b>	
<b>Name</b>	<b>Title</b>
<i>Rich DeLuca</i>	<i>Stormwater Coordinator</i>
<i>Frank DeMarco</i>	
<i>Nick Jordan</i>	
<b>Evaluator Observations:</b>	
<b>SWPPP or stormwater plan</b>	
Has the maintenance facility developed a SWPPP or stormwater plan?	<b>Not required.</b>
Does the plan include a site map, list of pollutant sources, BMPs, and maintenance procedures?	<b>N/A.</b>
Does the permittee conduct and document periodic inspections of the facility?	<b>No formal inspection for stormwater BMPs.</b>
Are storm drains labeled and free of debris?	<b>Drains are not labeled, and they are covered in debris such as slag and salt.</b>
<b>Vehicle maintenance, fueling and washing</b>	
Are vehicle maintenance activities conducted in a designated place not exposed to stormwater?	<b>NO vehicle maintenance occurs at this site.</b>
Are fueling stations properly designed with spill kits nearby?	<b>N/A. No fueling stations are present.</b>
Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer?	<b>No vehicle washing is conducted onsite.</b>
<b>Material storage</b>	
Are all materials that are potential stormwater contaminants stored under cover or in secondary containment?	<b>The city stores their salt at this facility. No controls have been implemented to protect the MS4 from the salt/ slag runoff.</b>
<b>Hazardous waste management</b>	
Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff?	<b>Unknown. The city only rents the space for salt storage. Other hazardous materials may be present, but city has no control over these pollutants.</b>
<b>Waste management</b>	
Are waste bins covered with waste properly disposed in containers?	<b>No waste bins on site.</b>
How is landscape waste stored?	<b>City does not produce landscape waste at this facility.</b>
<b>Spill response</b>	
Does the facility have a spill response plan, and are spill kits readily available?	<b>No spill response plan for site.</b>
<b>Employee training</b>	
What type of stormwater training does maintenance staff receive?	<b>See Interview.</b>

**Notes or additional information:**

**Salt Storage**

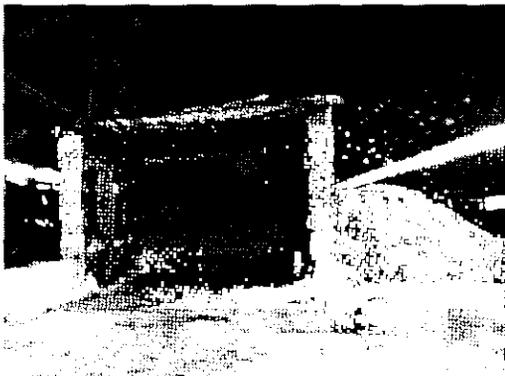
The salt for the city of Struthers, along with a couple of surrounding cities, is stored at the CASTLO industrial park on a brown field. It is recommended that the city find a new practice for storing their salt. While the salt remains at this site, certain BMPs must be implemented to control the runoff from the salt/ slag piles. The holes in the roofed area are allowing rain to reach the piles and creating a runoff. Theses stockpiles need to be covered, with tarp for example, and the storm drain adjacent to the piles needs to be cleaned and protected from the salt with inlet protection.

**City of Struthers MS4 Program Audit**

**Municipal Operation Photos**

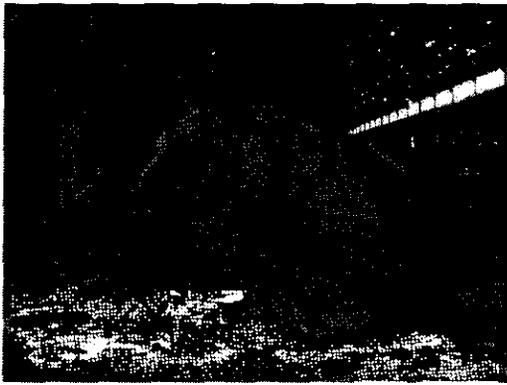
**Salt Storage (CASTLO)**

Location: CASTLO Industrial Park  
Date Photos Taken: July 14, 2009  
Taken by: Ken Safranek



**Fig 1 (LEFT):** Salt barn inside the CASTLO Industrial Park. Salt is not all contained under the second roof. The slag and salt mix on the right side of the building has no controls to prevent runoff from going straight to the storm drain less than 10 feet from the pile.

**Fig 2 (RIGHT):** Storm drain inside building is covered with slag and salt. The drain seems to be clogged with these pollutants. There needs to be some sort of inlet protection to keep debris and runoff from entering the drain.



**Fig 3 (LEFT):** Pile of slag on opposite side of salt storage.



**Fig 4 (RIGHT):** The City of Campbell stores salt at this facility as well. There are no controls for this pile, and runoff was noted exiting the building.