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MEDINA

HINCKLEY

HINCKLEY TOWNSHIP

3GQ10007 2009/07/23

MOODY,  
CHRISTOPHER

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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 Korleski, Director

July 23, 2009

RE: MEDINA COUNTY  
ROCKY RIVER BASIN  
HINCKLEY TOWNSHIP  
MS4 PROGRAM AUDIT

Hinckley Township Trustees  
1410 Ridge Road  
PO BOX 344  
Hinckley, Ohio 44233

Dear Trustees:

Ohio EPA has completed an audit of the Hinckley Township Municipal Storm Water Program. 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) #3GQ10007\*AG and Ohio Administrative Code 3745-39. On March 2 and March 3, 2009, Ohio EPA met with you and other representatives of Hinckley Township to determine compliance with the NPDES permit and the Storm Water Management Plan (SWMP) submitted by Hinckley Township in March 2003.

Storm water best management practices (BMPs) were evaluated to determine if they are being implemented per the expectations of Ohio EPA. In performing this audit, Ohio EPA implemented the Municipal Storm Water Program Evaluation Guide developed by the United States Environmental Protection Agency.

The attached checklist detail responses provided to Ohio EPA during the audit, information supplied by the Hinckley Township SWMP, annual reports, and comments by Ohio EPA regarding your MS4 program. Please review them in detail to determine specific elements where your program needs improvement. Although you will find comments requesting improvements throughout these checklists, in general, Ohio EPA is satisfied with the progress made thus far in implementing programs under the following Minimum Control Measures (MCMs):

- Good Housekeeping & Pollution Prevention for Municipal Operations and
- Public Involvement and Public Education.

The following MCMs require significant program development:

- Illicit Discharge Detection and Elimination;
- Construction Site Runoff Control; and
- Post-Construction Storm Water Management.

Hinckley Township Trustees  
MS4 Program Audit  
July 23, 2009  
Page 2

Please review my comments and provide me with a letter of response detailing the specific actions you will take to address my concerns. **Your response must be received by October 1, 2009.**

If you have any questions, please contact me at (330) 963-1118.

Sincerely,



Chris Moody  
Environmental Specialist  
Division of Surface Water

CM/mt

cc: James Kamps

ec: Jason Fyffe, Ohio EPA, DSW, CO  
Anthony Robinson, Ohio EPA, DSW, CO

**Hinckley Township  
Municipal Separate Storm Sewer Program  
Audit**

**March 2, 2009 to March 3, 2009**

## Program Management Component Worksheet

**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.

<b>Date of Evaluation</b> March 2, 2009
<b>Evaluator Name, Title</b> Chris Moody Environmental Specialist
<b>MS4 Permittee</b> Hinckley Township

<b>Staff Interviewed</b>		
<b>Name</b>	<b>Department/Agency</b>	<b>Phone Number/Email</b>
Mr. Jim Kamps Storm Water Management Plan Coordinator / Zoning Commission Chairman	Hinckley Township Zoning Commission	(330) 278-4181 jkamps@hinckleytp.org
Mr. Paul Magovac Foreman	Hinckley Township Street Department	(330) 225-2276 pmagovac@hinckleytp.org
Mr. Gary Norcia Watershed Coordinator	Medina Soil and Water Conservation District (Medina SWCD)	(330) 722-2628 gnorcia@medinaco.org
Mr. Charles Pope Zoning Inspector	Hinckley Township Zoning Department	(330) 278-2463 cpope@hinckleytp.org

<b>Comprehensive Stormwater Management Planning SWMP Planning</b>	
<b>Interview Questions</b>	<b>Response</b>
SWMP Plan developed?	Yes  SWMP was developed March 2003.
If not, what is used to guide planning and implementation?	N/A
If multiple co-permittees, does each have a SWMP document?	N/A
Is there an MS4-wide document if multiple co-permittees?	N/A
If the permittee is a municipality, does the comprehensive plan include stormwater elements? If so, what types?  <ul style="list-style-type: none"> <li>• Imperviousness</li> <li>• Open space</li> <li>• Water body protection</li> </ul>	Yes  <b>While the permittee is not a municipality, the Hinckley Township SWMP does incorporate the following storm water elements:</b> <ul style="list-style-type: none"> <li>• Imperviousness</li> <li>• Open Space</li> <li>• Riparian Setbacks</li> <li>• Wetland Setbacks</li> </ul>

# MS4 AUDIT REPORT

Were stakeholders included in the planning process?	Yes	
<b>Applicable Documents</b>	<b>Reviewed</b>	<b>Obtained</b>
SWMP Plan	Yes	Yes

<b>Notes</b>
<p><b><u>Open Space and Degree of Imperviousness (BMP 30)</u></b></p> <p>The SWMP contains components to review open space design criteria to lessen the degree of imperviousness. The 2004 goal was to “assess current regulations and policies and adopt updated regulation. Establish formal agreements between partners.” Hinckley Township must submit to Ohio EPA copies of the formal agreements that have been established between partners and information that details when the 2006 and 2007 goals were achieved (i.e. reviewing the regulations and updating as necessary).</p>
<p><b><u>Regulatory Mechanism for Riparian and Wetland Area Protection (BMP 25)</u></b></p> <p>Section 6R1.7(F) of the Hinckley Township regulations establishes floodway and wetland protection. A minimum buffer of twenty feet is established for wetlands. According to the 2008 annual report, Hinckley Township “needs to depend on the County for such regulations.” Part III.A.1.b. of the MS4 General Storm Water Permit requires that the SWMP must include information “for each BMP identified, statements indicating whether you believe you have the legal authority to implement said BMP.” Hinckley Township must submit information to Ohio EPA detailing why it does not believe it has the legal authority to pass a regulatory mechanism for riparian and wetland protection.</p>
<p><b><u>Storm Water Commission (BMP 1)</u></b></p> <p>The SWMP establishes an annual goal that the local storm water commission will hold four meetings. According the 2008 annual report, only one meeting was held on January 29, 2009. Hinckley Township must submit information to Ohio EPA documenting why the MCM component, provided above, has not been satisfied. Hinckley Township must hold four local storm water commission meetings annually.</p>

<b>Comprehensive Stormwater Management Planning Intergovernmental, Agency, Departmental Coordination</b>	
<b>Interview Questions</b>	<b>Response</b>
Are roles and responsibilities for multiple co-permittees established?	N/A  Roles and responsibilities are defined within the SWMP.
If multiple co-permittees, is there an “umbrella group” to coordinate activities?	N/A  Name of Group: N/A

# MS4 AUDIT REPORT

<p>Are the MOUs between co-permittees and outside agencies?</p>	<p style="text-align: center;"><b>Varies</b></p> <p>Letters of acknowledgement have been submitted by the Medina County Department of Planning Services, Medina County Highway Engineer, Medina County Health Department, Medina County Sanitary Engineering Department, and Medina SWCD.</p>
<p>How are in-house departments coordinated?</p>	<p>The Storm Water Management Plan Coordinator is responsible for coordinating in-house departments and documents the information provided by other agencies regarding the implementation of the SWMP.</p>
<p>Is there a stormwater task force or committee in place?</p>	<p style="text-align: center;"><b>Yes</b></p> <p>The SWMP establishes a goal of the storm water commission holding four local storm water commission meetings and attending two countywide meetings annually.</p> <p><u>Local Storm Water Commission Meetings</u></p> <p>Records maintained by Hinckley Township document that the local storm water commission held meetings on January 21, 2004, February 18, 2004, May 19, 2004, August 18, 2004, March 16, 2005, and January 29, 2008.</p> <p><u>Countywide Storm Water Commission</u></p> <p>Records maintained by Hinckley Township document that Hinckley Township attended countywide storm water commission meetings on January 20, 2005, March 9, 2006, October 30, 2006, February 26, 2007, October 25, 2007, February 12, 2008, November 6, 2008, and February 5, 2009.</p> <p>Hinckley Township did not attend the countywide storm water commission meeting held November 16, 2005.</p>

# MS4 AUDIT REPORT

Are outside groups used to implement the SWMP?	Yes	
	Name of Group(s):	
	- Girl Scouts	
	- Brownies	
<b>Applicable Documents</b>	<b>Reviewed</b>	<b>Obtained</b>
MOUs or other agreements	Partially	Partially
Meeting schedules for in-house or inter-agency task forces or committees	Yes	Yes

Notes
<p><b><u>Memorandums of Understanding</u></b></p> <p>While the SWMP details the specific agency that is the lead for satisfying the goal for each individual BMP, Ohio EPA requires formal MOUs to be established with each agency that will be utilized to implement the SWMP. The MOU must clearly define the roles, responsibility, and service to be provided for each Medina County agency utilized to implement the SWMP.</p> <p>Hinckley Township had an updated MOU with the Medina County Health Department. Hinckley Township must obtain MOUs from all Medina County agencies utilized to implement the SWMP. Copies of all of the signed MOUs must be submitted to Ohio EPA.</p>

<b>Comprehensive Stormwater Management Planning Staff Inventory &amp; Organization</b>		
Interview Questions	Response	
Has an organizational chart been developed?	Yes	
Have roles and responsibilities been assigned?	No	
	Roles and responsibilities of staff have not been assigned.	
<b>Applicable Documents</b>	<b>Reviewed</b>	<b>Obtained</b>
Stormwater program staff lists, responsible parties, contact names, organizational charts	Not Available	Not Available

Notes
<p><b><u>In-House Coordination</u></b></p> <p>Roles and responsibilities of in-house departments for each agency involved in SWMP implementation have not been established within the SWMP. In addition, the roles and responsibilities of employees utilized to implement the SWMP have not been defined. An organizational chart must be developed to clearly define the roles and responsibilities of agency staff utilized to implement the SWMP. The organizational chart must provide the responsibilities of each individual/department, staff lists, and contact information for the staff implementing the SWMP. The creation of a SWMP organizational chart would greatly improve in-house coordination and aid in addressing complaints and storm water related issues as they arise. Upon completion, a copy of the organizational chart must be submitted to Ohio EPA.</p>

# MS4 AUDIT REPORT

Part III.A.d of the MS4 General Storm Water Permit requires the SWMP to include “the person or persons, including position title or titles, responsible for implementing or coordinating the BMPs for your SWMP. The SWMP shall include a Table of Organization, including a primary point of contact, which identifies how implementation across multiple positions, agencies and departments will occur.”

## Coordination with Outside Groups

Medina SWCD performs all of the coordination with outside groups that are utilized to implement the public involvement and participation BMPs of the SWMP. The roles and responsibilities of the Medina SWCD have been established within the SWMP. Medina SWCD’s coordination with outside groups appears acceptable.

<b>Comprehensive Storm Water Management Planning Performance Standards or Goals</b>		
<b>Interview Questions</b>	<b>Response</b>	
Have measurable goals or standards been developed for each SWMP program component?	Yes	
Do the goals address water quality impact or effectiveness? How?	Yes  The SWMP establishes goals that address effectiveness.	
<b>Applicable Documents</b>	<b>Reviewed</b>	<b>Obtained</b>
Performance standards, measurable goals, schedule	Yes	Yes

<b>Notes</b>
<p><b><u>Performance Goals</u></b></p> <p>Performance goals have been established for each minimum control measure’s compliance activity and do not address water quality impacts. The performance goals that have been established for each minimum control measure’s compliance activity are quantified through effectiveness, such as the level of services provided.</p> <p>East Branch of the Rocky River:</p> <p>According to Ohio EPA’s final 2008 integrated water quality monitoring and assessment report (IWQMAR), specifically page 78 of Section M2:Watershed Assessment Unit Results, the East Branch of the Rocky River has an integrated report assessment category (IRAC) of 5.0, which means that the water is impaired or threatened and a TMDL is needed. In addition, the IWQMAR establishes that the high magnitude causes (HMC), defined as the listing of the most prominent “agents” deemed responsible for the observed aquatic life use impairment in the Assessment Unit and which will be the initial focus of restoration activities or TMDL development within the watershed, are unionized ammonia, chlorine, nutrients, siltation, organic enrichment/D.O., flow alteration, direct habitat alterations. The high magnitude sources (HMS), defined as the listing of the most prominent origins of the “agents” (HMC) deemed responsible for the observed aquatic life use impairment, are municipal point source, highway/road/bridge/sewer line, land development/suburbanization, urban runoff/storm sewers, channelization – development, flow reg./mod. – development, streambank destabilization – development, and marinas. Ohio EPA recommends that Medina County evaluate the HMCs and HMSs that are occurring within the</p>

# MS4 AUDIT REPORT

urbanized area and incorporate BMPs to reduce, minimize, or eliminate the HMCs causing impairment and/or threatening the East Branch of the Rocky River.

For your convenience the IWQMAR is available at the following internet address:

<http://www.epa.state.oh.us/dsw/tmdl/2008IntReport/2008OhioIntegratedReport.html#Section%20M>

## Comprehensive Stormwater Management Planning Prioritization of Resources

Interview Questions	Response
<p>Have pollutants of concern (POC) been established? If yes, based on what?</p> <ul style="list-style-type: none"> <li>• 303(d) list?</li> <li>• TMDLs?</li> <li>• Predominant land uses?</li> <li>• Existing watershed planning efforts?</li> </ul>	<p style="text-align: center;">Yes</p> <p>Basis:</p> <p>A list of target pollutant sources, appendix A in the SWMP, has been developed and includes nutrients (phosphorus and nitrogen), ammonia, pathogens (bacteria and viruses), heavy metals (lead, zinc, and mercury), habitat modifications, and chlorine.</p> <p>Hinckley Township stated that POCs have not been established. Hinckley Township must submit information to Ohio EPA that details how the target pollutant sources, appendix A in the SWMP, is utilized.</p>
<p>Have POC-specific strategies been developed in the SWMP?</p>	<p>No</p>
<p>How does the permittee decide program implementation priorities for resource allocation?</p>	<p>Resource allocation for program implementation priorities is defined by general revenue funds, existing personnel, and agency contracts.</p>

### Notes

#### SWMP Implementation Failures

A review of 2008 annual report and information provided by Hinckley Township, Medina SWCD, and Medina County Highway Engineers documents that many MCM goals have not been achieved. Specifically, the goals established for BMPs 1, 5, 12, 16, 17, 18, 20, 24, 25, 26, 29, 32, 33, 34, and 37. Hinckley Township must submit information to Ohio EPA documenting why the MCM goals, provided above, have not been satisfied and a revised schedule as to when the BMPs are expected to be completed. Please refer to each specific portion of this audit report for additional information regarding each violation.

### Assessment and Evaluation

Interview Questions	Response
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# MS4 AUDIT REPORT

<b>Assessment and Evaluation</b>	
<b>Interview Questions</b>	<b>Response</b>
Is the SWMP regularly measured against goals or standards?	<p><b>Yes</b></p> <p>The SWMP is evaluated in conjunction with the annual report submittal to Ohio EPA and during semi-annual storm water commission meetings.</p>
Have load reduction goals been established or assessed?	<p><b>No</b></p> <p>Load reduction goals have not been established or addressed.</p>
Have other types of improvements been assessed? <ul style="list-style-type: none"> <li>• Riparian habitat?</li> <li>• Stream corridor?</li> <li>• Aquatic habitat?</li> <li>• Groundwater</li> </ul>	<p><b>Yes</b></p> <p>What types?</p> <p>The Hinckley Township SWMP does provide evaluating the following improvements:</p> <ul style="list-style-type: none"> <li>• Riparian Setbacks</li> <li>• Wetland Setbacks</li> </ul>

<b>Notes</b>
<p><b><u>Improvement Types</u></b></p> <p>Please refer to the “Open Space and Degree of Imperviousness” and “Regulatory Mechanism for Riparian and Wetland Area Protection” sections within the “Program Management Component Worksheet” of this audit report for previously made comments.</p>

<b>Data Collection and Reporting</b>		
<b>Interview Questions</b>	<b>Response</b>	
Are reporting requirements in the MS4 permit for the following: <ul style="list-style-type: none"> <li>• Co-permittees?</li> <li>• An umbrella organization/group?</li> </ul>	<p><b>Not Applicable</b></p> <p><b>Not Applicable</b></p>	
How are data or information from outside groups obtained?	<p>Data and information from outside groups are obtained during the last storm water commission meeting that is typically held in late January or early February.</p>	
Have internal reporting deadlines been established?	<p><b>No</b></p> <p>Verbal commitments have been established.</p>	
<b>Applicable Documents</b>	<b>Reviewed</b>	<b>Obtained</b>
Reporting or assessment procedures	Not Available	Not Available

# MS4 AUDIT REPORT

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Notes
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<b><u>Annual Reporting / Evaluation Considerations for Phase II Program (BMP 38)</u></b>
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No specific reporting procedures have been established for obtaining reporting information from the Medina County agencies and townships involved in SWMP implementation. Specific reporting procedures for reporting information should be developed in order to improve the communication and coordination between Hinckley Township and the Medina County agencies involved in SWMP implementation.

# MS4 AUDIT REPORT

## Public Education/Involvement Component Worksheet

<b>Date of Evaluation</b> March 2, 2009
<b>Evaluator Name, Title</b> Chris Moody Environmental Specialist
<b>MS4 Permittee</b> Hinckley Township

**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
Mr. Jim Kamps Storm Water Management Plan Coordinator / Zoning Commission Chairman	Hinckley Township Zoning Commission	(330) 278-4181 jkamps@hinckleytp.org
Mr. Paul Magovac Foreman	Hinckley Township Street Department	(330) 225-2276 pmagovac@hinckleytp.org
Mr. Gary Norcia Watershed Coordinator	Medina SWCD	(330) 722-2628 gnorcia@medinaco.org
Mr. Charles Pope Zoning Inspector	Hinckley Township Zoning Department	(330) 278-2463 cpope@hinckleytp.org

Goals and Objectives		
Interview Questions	Response	
Outreach strategy document developed?	Yes  An outreach strategy document has been developed.	
Measurable goals included in the document?	No  Measurable goals have not been established within an outreach strategy document, but have been developed within the SWMP.	
Applicable Documents	Reviewed	Obtained
Outreach strategy	Yes	Yes

Notes
<p><b>Rationale Statement</b></p> <p>Part III.B.1.b. of the MS4 General Storm Water Permit required that a rationale statement be developed that shall address the following:</p> <ul style="list-style-type: none"> <li>• How you plan to inform individuals and households about the steps they can take to reduce storm water pollution;</li> <li>• How you plan to inform individuals and groups on how to become involved in the storm</li> </ul>

# MS4 AUDIT REPORT

<b>Notes</b>	
<p>water program (with activities such as local stream and beach restoration activities);</p> <ul style="list-style-type: none"> <li>• Who are the target audiences for your education program who are likely to have significant storm water impacts (including commercial, industrial and institutional entities) and why those target audiences were selected;</li> <li>• What are the target pollutant sources your public education program is designed to address;</li> <li>• What is your outreach strategy, including the mechanisms (e.g., printed brochures, newspapers, media, workshops, etc.) you will use to reach your target audiences, and how many people do you expect to reach by your outreach strategy over the permit term;</li> <li>• Who (person or department) is responsible for overall management and implementation of your storm water public education and outreach program and, if different, who is responsible for each of the BMPs identified for this program; and</li> <li>• How will you evaluate the success of this minimum measure, including how you selected the measurable goals for each of the BMPs.</li> </ul>	
<p>Hinckley Township must develop a rationale statement that addresses the above information.</p>	

<b>Message Development</b>	
<b>Interview Question</b>	<b>Response</b>
<p>Specific stormwater messages been developed?</p> <p>Describe:</p>	<p style="text-align: center;">Yes</p> <p>According to the “Outreach Strategy” document, each year a new environmental theme is selected to educate the public.</p> <p>Please refer to “Message Packaging” section of this Audit Report for a comprehensive list of storm water messages developed by or utilized by Medina SWCD.</p>
<p>Based on what?</p>	<p>Pollutants of concern (POC):       <b>Yes</b>            Target audience:                   <b>Yes</b>            Behavior of concern:               <b>Yes</b>            Other:</p> <p>Please refer to “Message Packaging” section of this Audit Report for a comprehensive list of storm water messages developed by or utilized by Medina SWCD.</p>
<p>Illicit discharges being addressed?</p>	<p style="text-align: center;">Yes</p> <p>According to the 2008 annual report, Non-Storm Water Discharges (BMP 17), Hinckley Township relies on the Medina County Health Department to investigate dumping nuisances upon receiving a written, signed complaint. Hinckley Township must submit information to Ohio EPA that details how verbal complaints (i.e. telephone calls) are addressed.</p>

# MS4 AUDIT REPORT

Message Development		
Interview Question	Response	
	<p>According to the 2008 annual report, Implementation and Enforcement (BMP 18), Hinckley Township relies on the Medina County Health Department to utilize existing investigation procedures for illicit discharges. Hinckley Township must submit a copy of the existing investigation procedures to Ohio EPA.</p> <p>Records maintained by Hinckley Township verify that illicit discharge complaints received on September 23, 2004, April 13, 2005, April 14, 2005, May 20, 2005, April 4, 2007, January 30, 2008, and June 16, 2008 are being addressed.</p>	
Pesticides, herbicide, and fertilizer education being conducted?	<p>Yes</p> <p>According to the Medina SWCD, pesticide, herbicide, and fertilizer education is being provided at county events and in display stands placed at the Medina County public libraries and recreational centers.</p>	
Applicable Documents	Reviewed	Obtained
Materials containing central messages	Yes	Yes

Notes		
<b><u>Environmental Themes</u></b>		
Via a July 15, 2008 email from Medina SWCD and Hinckley Township's "Outreach Strategy" document, the following environmental themes have occurred or will occur:		
<u>Year</u>	<u>Environmental Theme</u>	<u>Emphasis</u>
2004	Stream Stewardship	Stream Functions Stream / Road Crossing Sponsorship
2005	Urban Pollution	Storm Drains
2006	Rain Gardens	Reducing Runoff
2007	Living at the Water's Edge	Homeowners' Guide to Clean Water
2008	Lawn Care	Fertilizers, Pesticides, Organic Debris, and Healthy Landscaping
2009	Low Impact Development	Rain Gardens, Sediment Control, and Reduction of Impervious Surfaces
2010	Streams	Headwaters, Wetlands, and Riparian Areas
2011	Car Care	Car Washing and Oil Changes
2012	Good Housekeeping	Disposal of Paint, Chemicals, and Waste Litter

# MS4 AUDIT REPORT

Target Audience											
Interview Questions	Response										
Target audiences established?	Yes  A very extensive list of target audiences has been established within Appendix D of the SWMP.										
Based on what:	<table> <tr> <td>Behavior</td> <td>Yes</td> </tr> <tr> <td>Location/neighborhood</td> <td>No</td> </tr> <tr> <td>Business</td> <td>Yes</td> </tr> <tr> <td>Age</td> <td>No</td> </tr> <tr> <td>Other:</td> <td></td> </tr> </table>	Behavior	Yes	Location/neighborhood	No	Business	Yes	Age	No	Other:	
Behavior	Yes										
Location/neighborhood	No										
Business	Yes										
Age	No										
Other:											
Target audiences regularly reevaluated?	Yes										
Homeowners a target for pesticide, herbicide, and fertilizer education?	Yes										
Applicable Documents	Reviewed	Obtained									
Studies to establish target audiences	Yes	Yes									

Notes
<p><b><u>Target Audience Evaluations</u></b></p> <p>The SWMP does not establish how Medina SWCD will evaluate the success of MCM No. 2. An effective public involvement and public education (PIPE) program must start by selecting a target audience and developing or obtaining the appropriate educational materials to deliver a message to address a specific behavior or POC. Each target audience will have its own, specific storm water message. Medina SWCD should be targeting audiences with the greatest potential for impacting storm water runoff. Target audiences should be prioritized and resources allocated accordingly. Part III.B.1.b. of the MS4 General Storm Water Permit requires Hinckley Township to evaluate the success of this minimum measure, including how you selected the measurable goals for each of the BMPs.</p> <p>Medina SWCD has developed a storm water survey to evaluate the success of MCM No. 2. On October 11-12, 2008, Medina SWCD conducted a storm water survey at the "Fall Foliage Tour" that consisted of ten storm water related statements. Eight residents from Hinckley Township participated in the survey. The storm water survey is also available from the following Medina SWCD internet address:</p> <p style="text-align: center;"><a href="http://www.medinaswcd.org/storm_water_survey.htm">http://www.medinaswcd.org/storm_water_survey.htm</a></p> <p>Part III.B.1.c. of the MS4 General Storm Water Permit requires MCM No. 2 to include more than one mechanism and target at least five different storm water themes or messages over the permit term. At a minimum, at least one theme or message shall be targeted to the development community.</p>

# MS4 AUDIT REPORT

Message Packaging			
Interview Questions		Response	
Types of message "packaging":		Medina SWCD utilizes newsletters, brochures, fact sheets, classroom education, presentations / workshops, internet addresses, Enviroscares, table displays, and newspaper articles.	
Different language materials distributed?		No	
Applicable Documents		Reviewed	Obtained
Bi-lingual materials		Not Available	Not Available
Materials used and distributed		Yes	Yes

Notes
<p><u>Message Packaging</u></p> <p>Various storm water messages have been developed or utilized by Medina SWCD that are based upon a specific issue or topic of concern and include the following:</p> <ul style="list-style-type: none"> <li>• <u>Assistance Information</u> A brochure entitled "How the Medina County Soil and Water Conservation District Can Help You."</li> <li>• <u>Storm Drain Stenciling</u> A fact sheet entitled "A Frog has Moved in."</li> <li>• <u>General Stream/Wetland/Watershed Information</u> Brochures entitled "Life at the Water's Edge," "Where Rivers Begin," "Watersheds and Medina County," "Introduction to Stream Management," "the Rocky River Watershed," "Common Myth: Dumping Yard Wastes in a Stream Helps to Stabilize the Banks," and "Stream Stewards." A map entitled "the Rocky River Watershed Map &amp; Urban Stream Information."</li> <li>• <u>Fertilizer Information</u> A brochure entitled "Healthy Lawn Healthy Environment."</li> <li>• <u>Pollution Prevention</u> Brochures entitled "Backyard Conservation," "the Solution to Storm Water Pollution," "National Pollutant Discharge Elimination System Storm Water Pollution Prevention," "Water's Edge" and "Pollution Prevention: Managing Horses and Protecting Water Quality."</li> <li>• <u>General Drainage Information</u> Brochure entitled "Ohio Drainage Laws" and "Drainage Around Your Home."</li> <li>• <u>Post-Construction BMP Information</u> A brochure entitled "Raingardens" and "Rain Garden Manual for Homeowners."</li> </ul> <p><u>Storm Water Website (BMP 7)</u></p> <p>The SWMP establishes an annual goal that a "countywide (or perhaps regional)" website will be</p>

## MS4 AUDIT REPORT

### Notes

advertised and updated semi-annually. Ohio EPA recommends that all education materials be placed on Medina SWCD's website so that they can be readily available to the public.

#### Educational Displays (BMP 9)

According to information provided by Medina SWCD, the following education displays were utilized:

Date	Event	Educational Display
April 20, 2008	Earth Day	"Home Rain Gardens"
May 10, 2008	Eco-Arts Festival	"Home Rain Gardens"
June 28, 2008 to August 3, 2008	Medina County Fair	"Headwater Streams" and "Medina County Watersheds"
October 11, 2008 to October 12, 2008	Fall Foliage Tour	"Enviroscape"
February 1, 2009	Hinckley Township Days	"Headwater Streams"

A total of sixty-eight (68) Hinckley Township residents were reached by educational displays that were placed at the Medina County Fair and the Fall Foliage Tour.

#### Storm Water Presentations (BMP 10)

The SWMP establishes an annual goal that three presentations will be given to residents, community groups, and public officials on various storm water issues. According to Hinckley Township records, storm water presentations were given March 7, 2003, July 25, 2003, June 21, 2004, January 4, 2007, March 6, 2007, and September 7, 2007. According to the 2008 annual report, three public hearing sessions regarding establishing riparian setback regulations. Hinckley Township must submit information to Ohio EPA detailing why the MCM requirement, provided above, has not been satisfied.

#### Community Newsletters & Articles (BMP 11)

The SWMP establishes an annual goal that three articles will be placed in local publication annually. Articles entitled "Progress in the Balanced Growth Program," "Stream Sponsorship," and "How to Become a Stream Steward" were published Summer 2007, Fall 2007, and Winter 2007, respectively. Articles entitled "Two Common Urban Streams Myths Dispelled," "Getting to Know Your Watershed," "Benefits of Rain Gardens," "Got Mud?," and "Construction Site Erosion Management Practices" were published in the Medina Gazette on June 19, 2007, January 15, 2008, February 26, 2008, April 1, 2008, and July 1, 2008, respectively. An article entitled "Trees Planted Help Stream, Rivers, Lake Erie" was published in the Brunswick Sun Times on December 27, 2007.

#### School Education (BMP 12)

The SWMP establishes an annual goal that one teacher workshop and programs presented to four classrooms. The SWMP specifies that Hinckley Township is served by the Highland Local School District. The 2008 annual report states "this goal has been accomplished;" however, according to information provided by Medina SWCD, only two school education events occurred in the Highland Local School District on October 30, 2008. According to Hinckley Township records,

## MS4 AUDIT REPORT

### Notes

school education events occurred on April 16, 2004 and April 19, 2005. Hinckley Township must submit information to Ohio EPA detailing why the MCM requirement, provided above, has not been satisfied.

#### Environmental Issues Referral Sheet (BMP 13)

The SWMP establishes an annual goal that the environmental issues referral sheet will be distributed and updated annually. Hinckley Township must submit information to Ohio EPA that clarifies who receives the environmental issues referral sheet. A copy of the environmental referral sheet must be submitted to Ohio EPA.

#### Cable Access Television (BMP 14)

The SWMP establishes an annual goal that one thirty minute program is broadcast five times. According to Medina SWCD information the following cable access storm water programs were broadcast:

Program	Date of Broadcast
"Down the Drain"	November 2004
"After the Rain"	June 19, 2005 to July 16, 2005
"Down the Drain"	June 22, 2005 to July 20, 2005
"Tempest in a Channel"	March 27, 2006 to April 28, 2006
"Down the Drain"	March 27, 2006 to April 28, 2006
"Tempest in a Channel" and "What Kids Say About Storm Water"	June 26, 2006 to September 4, 2006
"Riparian Forests," "We All Live Downstream," "Partnerships for Watersheds," and "Your Backyard Watershed"	May and June 2007
"After the Rain: Urban Runoff"	May 4, 2007 to May 17, 2007

#### Record Retention

Medina SWCD has initiated a tracking mechanism to record the specific message packages provided to residents during PIPE events. The tracking mechanism collects the following information:

- Type of message packaging provided to residents;
- The number of each message packaging provided to residents; and
- The number of residents reached by Medina SWCD educational displays.

Hinckley Township is maintaining records that document the date a SWMP BMP is satisfied, information regarding the BMP satisfied, and the current status of the BMP. The records are utilized to document that the SWMP goal established for the specific BMP has been satisfied.

### Distribution Mechanisms

Interview Questions	Response
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# MS4 AUDIT REPORT

Distribution Mechanisms		
Interview Questions	Response	
Methods and location of materials distribution:	<p>The primary method for educational material distribution occurs in the following manner:</p> <ol style="list-style-type: none"> <li>1. Placement of educational materials at Hinckley Township hall;</li> <li>2. Providing educational materials at PIPE events;</li> <li>3. Occasionally via newsletter articles; and</li> <li>4. Approximately three times per year via newspaper articles.</li> </ol>	
Distribution tracked?	<p>Yes</p> <p>Medina SWCD stated that the distribution of educational materials are maintained in a Microsoft Word document for the annual report, which was provided.</p> <p>Hinckley Township does not have records that detail the number of education materials distributed via the display at Hinckley Township hall.</p>	
Applicable Documents	Reviewed	Obtained
Tracking information	Yes	Yes

Notes
<p><b><u>Brochures and Fact Sheet (BMP 8)</u></b></p> <p>According to the 2008 annual report, Hinckley Township provided five brochures/fact sheets at Earth Day, Eco-Arts Festival, Medina County Fair, and the Fall Foliage Tour. Medina SWCD provided a record detailing the type and quantity of brochures provided to event attendees. In addition, the record also includes the number of Hinckley Township residents that viewed the Medina SWCD displays during the Medina County Fair and the Fall Foliage Tour.</p> <p>Hinckley Township's current population is currently approximately 7,000. Part III.B.1.c. of the MS4 General Storm Water Permit requires MCM No. 2 to reach at least 50 percent of your population over the permit term.</p>

Public Involvement Activities	
Interview Questions	Response
Public participation obtained during stormwater management program changes?	<p>No</p> <p>Hinckley Township stated that SWMP changes would occur programmatically with agency input. Please note that public involvement is a key aspect to SWMP development, which includes programmatic changes. Hinckley Township must provide an</p>

# MS4 AUDIT REPORT

Public Involvement Activities		
Interview Questions	Response	
	avenue for the public to be involved when making programmatic changes to the SWMP.	
	Ohio EPA highly recommends that residents be included into the Hinckley Township Storm Water Commission in order to satisfy the public involvement aspect to SWMP when changes are being considered. Hinckley Township must submit information to Ohio EPA that details how public involvement will occur when SWMP changes are to be made.	
Stormwater related volunteer activities sponsored or endorsed:	Yes	
	Please refer to "Public Involvement Activities Notes" within the "Public Education/Involvement Component Worksheet" section of this Audit Report for a comprehensive list of the community service hours activities that have been sponsored or endorsed.	
Applicable Documents	Reviewed	Obtained
Evidence of public participation in planning	No	No
Volunteer activities descriptions	Yes	Yes

Notes
<p><u>Volunteer Groups</u></p> <p>Medina SWCD utilized the following volunteer groups to participate in community service hours activities:</p> <ul style="list-style-type: none"> <li>• Brownie Troup 401</li> <li>• Brunswick High School students</li> <li>• Brunswick High School National Honor Society</li> </ul> <p><u>Storm Drain Stenciling (BMP 2)</u></p> <p>The SWMP establishes an MCM goal that twenty percent (20%) of storm drains were to be stenciled annually. According to the 2008 annual report, one hundred percent (100%) of the catch basins located within subdivisions in the urbanized area of Hinckley Township have been stenciled.</p> <p><u>Community Service Hours (BMP 3)</u></p> <p>Medina SWCD utilized various volunteer groups to perform the following activities:</p> <ul style="list-style-type: none"> <li>• Assisting with the Eco-Arts festival;</li> <li>• Performing stream monitoring;</li> <li>• Developing a stream monitoring video; and</li> <li>• Performing a stream clean-up within the Hinckley Reservation of the Cleveland Metroparks.</li> </ul>

# MS4 AUDIT REPORT

Notes
<p><u>Watershed/Creek-side Signage (BMP 4)</u></p> <p>The SWMP establishes an annual goal that twenty percent (20%) of all stream crossings will be signed via the “Sign Our Streams” program. According to the 2008 annual report, one hundred percent (100%) of the stream crossings have signage.</p>
<p><u>Stream Clean-Up (BMP 5)</u></p> <p>The SWMP establishes an annual goal that one stream clean-up will be performed. According to Hinckley Township records, stream clean-up activities occurred November 15, 2004 and April 9, 2005. The 2008 annual report states that Hinckley Township performed an additional stream clean-up on May 19, 2008. Hinckley Township must submit information to Ohio EPA that documents stream clean-ups occurred during 2006 and 2007. If stream clean-up did not occur during 2006 or 2007, Hinckley Township must submit information to Ohio EPA detailing why the MCM requirement, provided above, has not been satisfied.</p>
<p><u>Stream Monitoring Program (BMP 6)</u></p> <p>The SWMP establishes an annual goal that stream monitoring will occur in the spring and fall of each year. According to records maintained by Hinckley Township, stream monitoring occurred October 25, 2007, September 4, 2008, and October 27, 2008. The 2008 annual report states that stream monitoring occurred in May and September 2008.</p>

Evaluation Methods		
Interview Questions	Response	
Public Education and Involvement assessment methods:	Medina SWCD has commenced utilizing a storm water survey at the “Fall Foliage Tour,” which consisted of ten storm water related statements.	
	Eight (8) residents from Hinckley Township participated in the survey.	
Public awareness survey been performed?	Yes	
Describe most effective materials used:	Medina SWCD stated that school education is the most effective material utilized and also stated that brochures are effective.	
Applicable Documents	Reviewed	Obtained
Public awareness survey(s)	Yes	Yes

Notes
<p><u>Target Audience Evaluations</u></p> <p>Please refer to the “Target Audience Notes” within the “Public Education/Involvement Component Worksheet” section of this audit report for previously made comments.</p>

# MS4 AUDIT REPORT

## MS4 Maintenance Component Worksheet

<b>Date of Evaluation</b> March 2, 2009
<b>Evaluator Name, Title</b> Chris Moody Environmental Specialist
<b>MS4 Permittee</b> Hinckley Township

**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
Mr. Jim Kamps Storm Water Management Plan Coordinator / Zoning Commission Chairman	Hinckley Township Zoning Commission	(330) 278-4181 jkamps@hinckleytwp.org
Mr. Jeff Van Loon Manager	Medina SWCD	(330) 722-2628 jvanloon@medinaco.org
Mr. Paul Magovac Foreman	Hinckley Township Street Department	(330) 225-2276 pmagovac@hinckleytwp.org
Mr. Gary Norcia Watershed Coordinator	Medina SWCD	(330) 722-2628 gnorcia@medinaco.org
Mr. Charles Pope Zoning Inspector	Hinckley Township Zoning Department	(330) 278-2463 cpope@hinckleytwp.org

MS4 Mapping			
Interview Questions	Response		
Outfalls and receiving waters mapped?	Yes		
Catch basins?	Yes		
Pipes, ditches, other conduits?	No		
Public stormwater facilities (BMPs)?	No		
Private stormwater facilities (BMPs)?	No		
How are maps used (i.e. tracking illicit discharges)?	MS4 maps are utilized to track illicit discharges.		
Applicable Documents	Reviewed	Obtained	
Map(s) of MS4 system	Yes	No	

Notes
<p><u>MS4 Mapping (BMP 15)</u></p> <p>The MS4 General Storm Water Permit requires that by April 1, 2008, Hinckley Township must provide “a storm sewer map showing the location of all HSTSS connected to your MS4. This map shall include details on the type and size of conduits/ditches in your MS4 that receive discharges from HSTSS, as well as the water bodies receiving the discharges from your MS4.” The SWMP establishes a 2005 goal that the storm sewer map shall be completed. While mapping efforts have been undertaken, unfortunately, only the storm sewer outfalls from pipes have been mapped. The MS4 General Storm Water Permit defines</p>

# MS4 AUDIT REPORT

## Notes

an MS4 as a “conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels or storm drains) that are:

- Owned or operated by the federal government, state, municipality, township, county, district(s) or other public body (created by or pursuant to state or federal law) including special district under state law such as a sewer district, flood control district or drainage districts or similar entity or a designated and approved management agency under section 208 of the act that discharges into surface waters of the state; and
- Designed or used for collecting or conveying solely storm water,
- Which is not a combined sewer, and
- Which is not a part of a publicly owned treatment works.”

According to the 2008 annual report, Hinckley Township states that the Medina County Highway Engineers has updated the MS4 map of Hinckley Township to include ditch outfall points. Hinckley Township must submit a copy of the final outfall map must be submitted to Ohio EPA.

The MS4 General Storm Water Permit requires that the comprehensive storm sewer system map shall also include catch basins, pipes, ditches, flood control facilities (retention/detention ponds), post-construction water quality BMPs and private post-construction water quality BMPs which have been installed to satisfy Ohio EPA’s NPDES Construction Storm Water general permit and/or your local post-construction water quality BMP requirements.

### HSTS Mapping (BMP 15)

The MS4 General Storm Water Permit requires that by April 1, 2008, Hinckley Township must provide “a storm sewer map showing the location of all HSTSs connected to your MS4. This map shall include details on the type and size of conduits/ditches in your MS4 that receive discharges from HSTSs, as well as the water bodies receiving the discharges from your MS4.” The SWMP establishes a 2005 goal that the storm sewer map, including HSTSs, shall be completed. Hinckley Township stated that while it has a list of HSTSs that discharge into the MS4, mapping of the HSTSs has not been mapped.

According to the 2008 annual report, Hinckley Township states that the Medina County Highway Engineers has completed the HSTS map of Hinckley Township. Hinckley Township must submit a copy of the final HSTS map must be submitted to Ohio EPA.

<b>Catch Basin Cleaning</b>	
<b>Interview Question</b>	<b>Response</b>
Schedule established for inspections and cleaning?	Yes  Hinckley Township stated that catch basins are cleaned annually.
Is cleaning and maintenance of catch basin tracked:	No
How are spoils materials disposed of?	Hinckley Township utilizes catch basin spoil material as backfill. Please be aware that catch basin spoil materials are considered a solid waste and must be disposed of as a solid waste within a certified sanitary landfill that has been authorized to accept such wastes.

## MS4 AUDIT REPORT

	Hinckley Township must begin maintaining records of disposal to document that catch basin spoil materials are disposed of properly.	
Are storm drain pipes inspected?	Yes	
Proactive or only in response to blockage event?	Hinckley Township is performing proactive inspections in order to remove debris prior to storm events.	
<b>Applicable Documents</b>		
List of active construction projects	Reviewed	Obtained
	No	No
List of projects covered under a state/EPA general permit	No	No

Notes
<p><b><u>Implementation and Enforcement (BMP 32)</u></b></p> <p>The MS4 General Storm Water Permit requires that the SWMP establish “procedures for the proper disposal of waste removed from your MS4 and your municipal operations, including dredge spoil, accumulated sediments, floatables, and other debris.” Spoils collected from catch basin cleaning are a solid waste and must be disposed of within a certified solid waste landfill that has been authorized to accept such wastes. Hinckley Township must establish procedures to ensure that catch basin spoils are properly disposed of when catch basin cleaning occurs. A copy of the catch basin cleaning procedures must be submitted to Ohio EPA.</p> <p><b><u>Storm Sewer Inspection Program (BMP 34)</u></b></p> <p>The SWMP establishes an annual goal that twenty-five percent (25%) of storm sewers are to be inspected. According to the 2008 annual report, Hinckley Township inspects all storm ditches and swales monthly. Hinckley Township must begin maintaining records of the inspections and any corrective actions (i.e. cleanouts, repairs, etc.) that are required in order to verify compliance with this MCM component.</p>

<b>Stormwater Management Facilities Operation and Maintenance</b>		
Interview Questions	Response	
Public facilities inspected?	Not Applicable	
Frequency:	Not Applicable	
Private facilities inspected?	Not Applicable	
Frequency:	Not Applicable	
Checklist used for inspections?	Not Applicable	
Maintenance standards and procedures established?	Not Applicable	
Data evaluated to target maintenance resources?	No	
	No data is collected or evaluated to target maintenance resources.	
<b>Applicable Documents</b>		
	Reviewed	Obtained
Inspection checklist	Not Available	Not Available

## MS4 AUDIT REPORT

<b>Notes</b>
<p><b><u>New Flood Management Projects (BMP 36)</u></b></p> <p>Hinckley Township does not own or operate any storm water management facilities located within the urbanized area.</p>

<b>Road Maintenance</b>		
<b>Interview Questions</b>	<b>Response</b>	
Streets regularly swept?	No	
Frequency:	Hinckley Township does not perform street sweeping.	
Frequency based on water quality factors (e.g. proximity to streams)?	Not Applicable	
How are spoils disposed of?	Not Applicable	
BMPs used during road maintenance activities?	Not Applicable	
Describe:		
BMP guidance available to field staff?	Not Applicable	
Deicers used by MS4?	Hinckley Township utilizes rock salt.	
Type and amount of deicer tracked?	Hinckley Township purchased 2,156.04 tons of rock salt and utilized 1,900 tons during adverse winter road conditions.	
Sand/salt swept up after application?	Hinckley Township sweeps up the "large piles" of rock salt that fall from the trucks during application events.	
How soon?	Salt sweeping occurs on an "as needed" basis.	
<b>Applicable Documents</b>	<b>Reviewed</b>	<b>Obtained</b>
BMP guidance	Not Available	Not Available
Street sweeping records	Not Available	Not Available

<b>Notes</b>
<p><b><u>Snow Removal &amp; Street Salting (BMP 37)</u></b></p> <p>The MS4 General Storm Water Permit establishes that the SWMP include "[c]ontrols for reducing or eliminating the discharge of pollutants from streets, roads, highways, municipal parking lots, maintenance and storage yards, waste transfer stations, fleet or maintenance shops with outdoor storage areas, and salt/sand storage locations and snow disposal areas you operate." The SWMP establishes that "the Township (e.g. service department) will develop a written document for personnel to follow... This program will be reviewed and updated annually." According to the 2008 annual report, the service department calibrates the salt spreaders to ensure proper salt application rates. According to Hinckley Township records, no information has been maintained to verify compliance with this MCM component.</p> <p>Hinckley Township must submit information to Ohio EPA that documents that the annual program review has occurred. In addition, a copy of the written snow removal and street salting document must be submitted to Ohio EPA. Should Hinckley Township be unable to provide such information,</p>

# MS4 AUDIT REPORT

<b>Notes</b>
Hinckley Township must submit information detailing why the MCM requirement, provided above, has not been satisfied and a revised schedule as to when the BMP is expected to be completed. A copy of the final salt minimization plan must also be submitted to Ohio EPA.

<b>Flood Management</b>			
<b>Interview Questions</b>	<b>Response</b>		
Inventory of flood management structures completed?	No		
Structures been assessed for stormwater retrofit?	No		
New structures include water quality considerations?	Yes		
	Only if the new flood management structure will result in an earth disturbance of greater than one acre.		
<b>Applicable Documents</b>		<b>Reviewed</b>	<b>Obtained</b>
Inventory		Not Available	Not Available

<b>Notes</b>
<u><b>Flood Management Facilities</b></u>
Hinckley Township does not own or operate any flood management facilities located within the urbanized area.

<b>Facilities Operation &amp; Maintenance</b>	
<b>Interview Questions</b>	<b>Response</b>
Inventory of MS4 facilities complete (i.e. facilities owned and operated by the MS4)?	Not Applicable
	An inventory of MS4 owned, or operated, facilities has not been completed. Hinckley Township stated that no MS4 owned or operated facilities are located within the urbanized area.
Types of facilities included:	Not applicable
Facilities inspected?	Not applicable
Frequency:	Not applicable
Checklist used?	Not applicable
Staff which perform the inspections (department or agency):	Not applicable
Facilities required to have stormwater pollution prevention plan (SWP3)?	Not applicable
Is there a designated stormwater contact person for each facility?	Not applicable
Describe enforcement procedures used to address noncompliance on a MS4-owner facility:	Not applicable
Parking lots owned/operated by the permittee swept?	No
Sanitary sewer systems evaluated to determine storm sewer cross-connections or overflow locations?	Unknown

# MS4 AUDIT REPORT

<b>Facilities Operation &amp; Maintenance</b>			
<b>Interview Questions</b>		<b>Response</b>	
Extent of infiltration and inflow (I&I) into storm sewer system:		Unknown	
Sewer spill and cleanup procedures in place?		Unknown	
<b>Applicable Documents</b>		<b>Reviewed</b>	<b>Obtained</b>
Facility inventory		Not Available	Not Available
Facility SWP3		Not Available	Not Available

<b>Notes</b>
<p><b><u>Operations and Maintenance (BMP 31)</u></b></p> <p>Hinckley Township does not own or operate any MS4 facilities located within the urbanized area; however, an operation and maintenance plan has been developed.</p> <p><b><u>Fleet Maintenance Program (BMP 35)</u></b></p> <p>Hinckley Township must submit a copy of the current fleet maintenance program to Ohio EPA.</p> <p><b><u>Sanitary Sewer Cross Connections</u></b></p> <p>Hinckley Township stated that complaints received trigger a storm sewer cross-connection investigation. Hinckley Township utilizes a MS4 compliance database for tracking storm sewer cross-connection complaints. In addition, the Hinckley Township zoning department also tracks storm sewer cross-connection complaints via parcel number.</p>

<b>Pesticides, Herbicides &amp; Fertilizers</b>			
<b>Interview Questions</b>		<b>Response</b>	
Certified applicators used?		No	
Integrated Pest Management (IPM) practices used?		No	
Storage location of pesticides, herbicides, and fertilizers:		Not Applicable	
BMPs used during application:		Hinckley Township does not currently apply pesticides, herbicides, or fertilizers.	
Fertilizer/pesticide application plan utilized?		Not Applicable	
<b>Applicable Documents</b>		<b>Reviewed</b>	<b>Obtained</b>
Fertilizer/pesticide application plan		Not Available	Not Available

<b>Notes</b>
<p><b><u>Pesticides, Herbicides &amp; Fertilizers</u></b></p> <p>Hinckley Township does not currently apply pesticides, herbicides, or fertilizers.</p>

<b>Standards, BMPs, &amp; Outreach</b>			
<b>Interview Questions</b>		<b>Response</b>	
BMP technical guidance document available to maintenance staff?		No	
		A technical guidance document is unavailable	

# MS4 AUDIT REPORT

<b>Standards, BMPs, &amp; Outreach</b>			
<b>Interview Questions</b>	<b>Response</b>		
	to maintenance staff.		
MS4 use contractual staff to complete MS4 maintenance activities?	Yes  Grass cutting at cemeteries and along roadways occurs regularly.		
BMP guidance materials provided to contracted staff?	No  Guidance materials are not provided to technical staff.		
Requirement to consider stormwater impacts and utilize appropriate BMPs in contracts?	No  Hinckley Township does not have a requirement to consider storm water impacts and utilize appropriate BMPs in contracts.		
Materials used to educate the public regarding stormwater impacts on MS4 property (if applicable, i.e. public spaces):	Pet waste:  Yes  Please refer to the "Message Packaging" section within the "Public Education/Involvement Component Worksheet" of this audit report for a comprehensive list of education materials.  Litter reduction:  Yes  Please refer to the "Message Packaging" section within the "Public Education/Involvement Component Worksheet" of this audit report for a comprehensive list of education materials.		
	<b>Applicable Documents</b>	<b>Reviewed</b>	<b>Obtained</b>
	BMP manual or guidance document	Not Available	Not Available
	Contract language for MS4 operation and maintenance activities	Not Available	Not Available

<b>Notes</b>
No additional comments.

<b>Staff Education and Training</b>	
<b>Interview Questions</b>	<b>Response</b>
Staff trained to identify illicit discharges?	Yes
Frequency:	Hinckley Township attended a Cuyahoga County Health Department illicit discharge training session on April 23, 2007.
Materials used to train staff:	Cuyahoga County Health Department illicit

## MS4 AUDIT REPORT

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<b>Staff Education and Training</b>			
<b>Interview Questions</b>		<b>Response</b>	
		discharge detection and elimination manual.	
<b>Applicable Documents</b>		<b>Reviewed</b>	<b>Obtained</b>
Training materials		No	No

<b>Notes</b>
<p><u>Training (BMP 33)</u></p> <p>The SWMP establishes an annual goal that Hinckley Township will sponsor or attend one O &amp; M procedures workshop annually. According to Hinckley Township records, an O &amp; M procedures workshop was attended on September 20, 2007. Hinckley Township must submit information (i.e. meeting agendas and attendance records) to Ohio EPA that documents that the MCM requirements have been satisfied.</p>

# MS4 AUDIT REPORT

## Construction Component Worksheet

<b>Date of Evaluation</b> March 3, 2009
<b>Evaluator Name, Title</b> Chris Moody Environmental Specialist
<b>MS4 Permittee</b> Hinckley Township

**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
Mr. Jim Kamps Storm Water Management Plan Coordinator / Zoning Commission Chairman	Hinckley Township Zoning Commission	(330) 278-4181 jkamps@hinckleytp.org
Mr. Jeff Van Loon Manager	Medina SWCD	(330) 722-2628 jvanloon@medinaco.org
Mr. Paul Magovac Foreman	Hinckley Township Street Department	(330) 225-2276 pmagovac@hinckleytp.org
Mr. Gary Norcia Watershed Coordinator	Medina SWCD	(330) 722-2628 gnorcia@medinaco.org
Mr. Charles Pope Zoning Inspector	Hinckley Township Zoning Department	(330) 278-2463 cpope@hinckleytp.org
Mr. Dan Willhoite Civil Engineer III	Medina County Highway Engineers	(330) 723-9573 dwillhoite@medinaco.org

Medina County Highway Engineers stated that, at the time of the Hinckley Township MS4 audit, the Hinckley Township audit findings for MCM 4 would be the same as the May 12, 2008 Medina County MS4 audit findings. Therefore, the Hinckley Township MS4 audit findings are reflective of the information detailed within the May 12, 2008 Medina County MS4 audit "Construction Component Worksheet."

Ordinance/Legal Authority	
Interview Questions	Response
Ordinance used to require stormwater BMPs at construction sites?	Yes
Name and/or code section(s).	Medina County Storm Water Management and Sediment Rules and Regulations (Medina E&S Rules), resolution 80-790.
Threshold for coverage (e.g., 1 acre, 100 cubic yards, etc.)	Section 1.4 of the Medina E&S Rules establishes a threshold for coverage of 5,000 square feet of disturbance on less than five contiguous acres of land owned by one person or operated as one development unit.
Exclusions from coverage allowed:	Section 1.3 of the Medina E&S Rules exempt

# MS4 AUDIT REPORT

<b>Ordinance/Legal Authority</b>	
<b>Interview Questions</b>	<b>Response</b>
	<p>activities specified in Ohio Revised Code (ORC) Chapter 307.79, strip mining operations regulated under ORC Chapter 1513.01, surface mining operations regulated under ORC Chapter 1514.01, and public transportation, utilities, and drainage improvements of maintenance undertaken by a government agency or political subdivision in accordance with a statement of their standard policies that that have been approved by the Board of Medina Commissioners or the Chief of SWCD.</p> <p>Section 1.5 of the Medina E&amp;S Rules establish a waiver for earth disturbing activities not automatically subject to exemptions by Section 1.3 may exist that the sediment volume leaving the disturbed area meets the acceptable rate. To obtain a waiver, the developer shall submit a written request to the Chief Executive Officer (CEO), Medina County Highway Engineers, and sufficient data to determine that granting a waiver will not result in erosion and sediment activities in excess of the allowable rates.</p>
Other pollutants regulated on construction sites (e.g., construction wastes, trash, chemicals, etc.):	Medina County Highway Engineers stated that they were unaware of any other pollutants regulated on construction sites. The Medina E&S Rules do not regulate any other pollutants on construction sites.
Permitting mechanism used to require appropriate BMPs (i.e. grading permit, building permit):	Medina County Highway Engineers utilize a Stormwater and Sediment Control Permit.
Is a plan required (erosion control plan or SWPPP)	<p>Varies, refer to the specific language below:</p> <p>Section 1.4(A) of the Medina E&amp;S Rules establishes that if a site disturbs more than 20,000 square feet or more on five or more contiguous acres of land owned by one person or operated as one development unit, a Stormwater and Sediment Control Plan shall be filed unless deemed unnecessary by the CEO, Medina County Highway Engineers.</p> <p>Section 1.4(B) of the Medina E&amp;S Rules establishes that if a site disturbs less than 20,000 square feet and more than 5,000 square feet on five or more contiguous acres of land owned by one person or operated as one development unit, a Stormwater and</p>

# MS4 AUDIT REPORT

<b>Ordinance/Legal Authority</b>		
<b>Interview Questions</b>	<b>Response</b>	
	<p>Sediment Control Plan is not required to be filed.</p> <p>Section 1.4(C) of the Medina E&amp;S Rules establishes that if a site disturbs less 5,000 square feet on less than five contiguous acres of land owned by one person or operated as one development unit, a Stormwater and Sediment Control Plan is not required to be filed.</p>	
<p>Are minimum construction site BMPs specified?</p> <p>What types?</p>	<p>No</p>	
<p>Types of enforcement mechanisms available:</p>	<p>Notices of Violations (NOV)      <b>Yes</b>            Administrative fines              <b>Unknown</b>            Stop-work orders                      <b>No</b>            Civil penalties                          <b>Yes</b>            Criminal penalties                      <b>No</b>            Other:</p>	
	<p>Section 1.6 of the Medina E&amp;S Rules establishes that the CEO, Medina County Highway Engineers, and/or the Medina SWCD can report violations to the Medina BOC after a reasonable time for compliance, one week, after receipt of a letter for voluntary compliance. If the Medina BOC determines that a violation exists and requests the Medina County Prosecutor (Medina CP) in writing, the Medina CP shall seek an injunction or other appropriate relief to abate excessive erosion or sedimentation and secure compliance with the Medina E&amp;S Rules.</p> <p>Medina County Highway Engineers stated that Section 1.6 is a very slow process.</p>	
<p>Official enforcement escalation plan or procedures in place?</p>	<p>No</p>	
	<p>Medina County Highway Engineers has not developed a formal enforcement escalation plan or enforcement escalation procedures.</p>	
<b>Applicable Documents</b>	<b>Reviewed</b>	<b>Obtained</b>
Grading, Erosion and Sediment Control, Stormwater or other related	Yes	Yes

# MS4 AUDIT REPORT

Ordinance/Legal Authority		
Interview Questions	Response	
Ordinance(s)		
Enforcement escalation plan or procedures	Not Available	Not Available

Notes
<p><b><u>Medina E&amp;S Rules (BMP 20)</u></b></p> <p>The SWMP establishes that updated Medina E&amp;S Rules were to be adopted by April 1, 2005. The MS4 General Storm Water Permit required that revised E&amp;S Rules be adopted by April 1, 2006. Medina BOC were notified via a Notice of Violation (NOV) letter, dated April 26, 2007, that Medina County had failed to adopt revised E&amp;S Rules. According to a July 14, 2009 Hinckley Township letter, the updated Medina E&amp;S Rules have a target date of July 23, 2009 for adoption. The updated Medina E&amp;S Rules can be located at the Medina County Highway Engineer's website: <a href="http://www.highwavengineer.co.medina.oh.us/">http://www.highwavengineer.co.medina.oh.us/</a>.</p>
<p><b><u>Implementation and Enforcement (BMP 21)</u></b></p> <p>The MS4 General Storm Water Permit establishes that the SWMP include a "plan to ensure compliance with your erosion and sediment control regulatory mechanism, including the sanctions and enforcement mechanisms you will use to ensure compliance. Describe your procedures for when you will use certain sanctions. Possible sanctions include non-monetary penalties (such as a stop work orders), fines, bonding requirements, and/or permit denials for non-compliance." A December 29, 2008 Medina County Commissioners' MS4 audit response letter included an enforcement escalation plan.</p> <p>Ohio EPA recommends that coordination occur between Hinckley Township and Medina County Highway Engineers, which are implementing portions of the SWMP when an enforcement action has been initiated on a construction site. Hinckley Township should consider not issuing local zoning and/or building permits on construction sites where an enforcement action has been initiated until the documented violations are resolved.</p>

Construction Project Inventory	
Interview Question	Response
Construction projects tracked?	Yes
Projects <1 acre?	Medina County Highway Engineers currently tracks construction projects electronically in a database.
Updated at what frequency?	Yes
Information tracked:	The construction project database is updated nightly.
	Project status Yes
	Inspection Findings Yes
	Enforcement Actions Yes
	Complaints Yes
	NOI submittal No
	Other:

## MS4 AUDIT REPORT

	<p>Medina County Highway Engineers also tracks drawings, erosion and sediment calculations, and all submitted plans.</p>		
Projects prioritized to determine inspection frequency?	<p>Yes</p>		
Criteria used:	Proximity to waterbody	No	
	Waterbody impairment	No	
	Size of project	No	
	Slope of project site	No	
	Other:		
	<p>Medina County Highway Engineers stated that a monthly inspection rotation occurs; however, noncompliant sites are inspected more frequently.</p>		
	<p>Medina County Highway Engineers stated that due to resource issues, the inspection frequency for residential construction sites is every two months due to resource issues. Medina County Highway Engineers also stated that the commencement of new residential construction is difficult to determine so the Medina County Building Department no notifies Medina County Highway Engineers when construction has been initiated.</p>		
Number of active projects:	<p>Medina County Highway Engineers provided a list of "open storm water permits from January 1, 2006 thru May 12, 2008," a list of "open commercial storm water permits," and a list of "Residential Subdivision SWP3 Inspection Records." The number of active projects is 703 and 170 (52 located in the MS4s), and eleven residential subdivisions, respectively.</p>		
	<b>Applicable Documents</b>	<b>Reviewed</b>	<b>Obtained</b>
	List of active construction projects	Yes	Yes
	List of projects covered under a state/EPA general permit	No	No

### Notes

#### Active Construction Project List

- Construction Activities** – Updated Medina E&S Rules must be passed that, at a minimum, establish the requirements of Ohio EPA's General Construction Storm Water Permit and must require proof of compliance that a property owner has received coverage under Ohio EPA's General Construction Storm Water Permit. Medina County Highway Engineers must immediately begin comparing the Medina County tracking database with Ohio EPA's list of authorized construction sites, which is available at the following internet address:

## MS4 AUDIT REPORT

<http://www.epa.state.oh.us/dsw/permits/gplist.html>

In the event that Medina County Highway Engineers discovers that an active construction site has not obtained coverage under Ohio EPA's General Construction Storm Water Permit for Construction Activities, the property owner must be directed to contact Ohio EPA's Storm Water program in order to obtain and submit a Notice of Intent to coverage under the General Construction Storm Water Permit.

- **Wetland/Stream Fill Activities** – Updated Medina E&S Rules must be passed that, at a minimum, establish the requirements of Ohio EPA's General Construction Storm Water Permit and must require proof of compliance that a property owner has received authorization to fill or impact any onsite jurisdictional stream and wetland or isolated stream and wetland, if applicable, from the United States Army Corps of Engineers or Ohio EPA's 401 Section, respectively.

### Construction Requirements and BMPs

Interview Questions	Response
Technical guidance provided or required?	Yes  Medina County Highway Engineers stated that ODNR's RLD manual and the Medina E&S Rules are provided.
Guidance include selection criteria?	Yes
Guidance include operation and maintenance requirements?	Yes  Medina County Highway Engineers stated that recommendations for operation and maintenance free BMPs are recommended as much as possible based upon trial and error.
Guidance have different requirements or standards for different times of the year (i.e. rainy vs. dry seasons)?	Yes
Applicable Documents	
BMP guidance or technical document	Reviewed: Yes Obtained: Yes

### Notes

No additional comments.

### Plan Review Procedures

Interview Questions	Response
Who performs erosion and sediment control plan review (i.e. planning department, building department)?	The following Medina County Highway Engineers staff perform erosion and sediment control plan review:  <u>Residential, Commercial, and Industrial Subdivisions</u> Mr. Andy Conrad, Assistant County Engineer Mr. Ron Spano, Civil Engineer II

# MS4 AUDIT REPORT

<b>Plan Review Procedures</b>	
<b>Interview Questions</b>	<b>Response</b>
	<p>Mr. Matt Martin, Civil Engineer I</p> <p><u>Commercial Sites</u>            Mr. Dan Willhoite, Civil Engineer III            Mr. Ron Spano, Civil Engineer II            Mr. Matt Martin, Civil Engineer I</p> <p><u>Residential Lots</u>            Mr. Tom Girard, Storm Water Technician II            Mr. Dan Metz, Storm Water Technician I            Ms. Krissy Alban, Storm Water Technician I</p>
Training received and frequency:	<p>Medina County Highway Engineers stated that periodic training occurs although no set schedule for receiving training occurs.</p> <p>Training records are located in employee files maintained by Human Resources.</p>
Size threshold for plan review (i.e. 1 acre, 10,000 square feet)?	<p>Medina County Highway Engineers stated that the size threshold for plan review is 5,000 square feet; however, this conflicts with Section 1.4(B) of the Medina E&amp;S Rules, which states that if a site disturbs less than 20,000 square feet and more than 5,000 square feet on five or more contiguous acres of land owned by one person or operated as one development unit, a Stormwater and Sediment Control Plan is not required to be filed.</p>
NOI submittal verified during review?	No
How (i.e. canceled permit fee check)?	Not applicable
Pre-project meetings conducted with developer?	Yes
	<p>Pre-project meetings conducted with developers are only held for subdivisions and large commercial and industrial sites. No size threshold has been established to determine when pre-project meetings are to occur for commercial and industrial sites.</p>
Standard conditions of approval include erosion and sediment control and/or general storm water requirements?	Yes
	<p>Medina County Highway Engineers provided a permit attachment that provides a list of standard conditions of approvals that include the following:</p> <ul style="list-style-type: none"> <li>• “Site improvements shall be constructed in accordance with a copy of the above-noted site plan drawings which have been</li> </ul>

# MS4 AUDIT REPORT

<b>Plan Review Procedures</b>	
<b>Interview Questions</b>	<b>Response</b>
	<p>stamped by this office and the conditions listed below;"</p> <ul style="list-style-type: none"> <li>• "Storm water runoff onto and from the site shall be handled and discharged in a manner that does not adversely affect other properties;"</li> <li>• "A stabilized construction entrance (i.e., stone driveway) shall be used by construction vehicles entering and exiting the site to reduce the tracking of mud onto the public road;"</li> <li>• "Soil erosion and sediment control measures shall be implemented as shown on the plan, as described herein, and as necessary to prevent sediment from leaving the site;"</li> <li>• "Any disturbed soil shall be final-graded and stabilized as quickly as possible by placing stone in proposed paved areas, applying seeding and matting in ditches, and by re-establishing vegetation in all other areas;"</li> <li>• "It shall be the owner's responsibility to obtain any other required agency approvals, including, but not limited to Army Corps of Engineers (e.g. Wetlands) OEPA (e.g. Stormwater Discharge Permitting), Township Zoning, and O.D.O.T.," and</li> <li>• "The existing Detention Basin outlet structure shall be repaired to meet current construction specifications."</li> </ul>
Plan review criteria or checklist used?	<p>Section 3.7 of the Medina E&amp;S Rules establishes an Erosion and Sediment Control Plan checklist that should be included in a narrative and on a site plan.</p> <p>In addition, Medina County Highway Engineers provided two additional checklists that are utilized by employees when reviewing plans. The checklists are entitled "Commercial Site Plan Review Checklist"</p>

## MS4 AUDIT REPORT

Plan Review Procedures		
Interview Questions	Response	
	and "Subdivision Construction Drawings Review Checklist" and contain erosion and sediment control components.	
Applicable Documents	Reviewed	Obtained
Copy of standard conditions of approval	Yes	Yes
Example of standard conditions applied to an approved project	Yes	Yes
Checklist used by plan reviewers	Yes	Yes

Notes
<p><b><u>Implementation and Enforcement (BMP 21)</u></b></p> <p>According to the SWMP, one hundred percent (100%) of SWP3s are reviewed and approved and one hundred percent (100%) of sites are inspected. The 2008 annual report states that there have been no subdivisions within the urbanized area. Hinckley Township must submit information to Ohio EPA that details if any non-subdivision (i.e. individual lot, commercial, industrial, etc.) construction sites disturbing one acre or larger have been initiated within the urbanized area of Hinckley Township.</p> <p>Medina County Highway Engineers stated that ODNR's RLD manual is utilized as the guidance document. When reviewing SWP3s, Medina County Highway Engineers must ensure that all of the erosion and sediment BMPS are designed in accordance with the specifications established within Medina County's technical guidance document, ODNR's RLD manual.</p> <p>NOTE: Ohio EPA does not review the SWP3 prior to General Construction Storm Water Permit issuance. Thus, General Construction Storm Water Permit issuance does not demonstrate that the SWP3 satisfies Ohio EPA requirements.</p> <p><b><u>SWP3 Checklist (BMP 21)</u></b></p> <p>The MS4 General Storm Water Permit establishes that the SWMP include "[p]rocedures for site plan review which incorporate consideration of potential water quality impacts." Medina County Highway Engineers must develop a SWP3 review checklist for industrial construction sites and non-subdivision residential construction sites, which will allow for consistent reviews to occur and will also provide a training mechanism for new employees. According to a December 29, 2008 Medina County Commissioners MS4 audit response letter, "Medina County does not have ability to enforce the regulations of any other agency." Upon adoption of the updated Medina E&amp;S Rules, Medina County must develop a SWP3 review checklist that will be utilized to ensure submitted SWP3s are complete.</p> <p>Ohio EPA highly recommends that one SWP3 review checklist be developed for all construction sites that disturb one acre or larger or less than one acre of disturbance and are part of a larger common plan of development because the requirements established within the General Construction Storm Water Permit do not change for the different zoning types of construction sites. For your convenience, Ohio EPA has developed a SWP3 construction site review checklist, which is available at the following internet address:</p> <p><a href="http://www.epa.state.oh.us/dsw/storm/const_SWP3_check.html">http://www.epa.state.oh.us/dsw/storm/const_SWP3_check.html</a></p>

# MS4 AUDIT REPORT

Notes
The MS4 General Storm Water Permit requires Hinckley Township's construction site storm water control program to include pre-construction storm water pollution prevention plan review of all projects from construction activities that result in a land disturbance of greater than or equal to one acre.

Construction Project Inspections	
Interview Questions	Response
Who performs construction storm water inspections (i.e. building inspector, dedicated stormwater inspector)? List all if different phases or areas of project are inspected by different staff. (i.e. public right-of-way, building footprint, grading phase, construction phase).	<p>The following Medina County Highway Engineers staff perform erosion and sediment control plan review:</p> <p><u>Residential, Commercial, and Industrial Subdivisions</u>            Mr. Conrad Sarnowski, Construction Inspection Supervisor            Mr. Matt Martin, Civil Engineer I</p> <p><u>Commercial Sites</u>            Mr. Tom Girard, Storm Water Technician II            Mr. Dan Metz, Storm Water Technician I            Ms. Krissy Alban, Storm Water Technician I</p> <p><u>Residential Lots</u>            Mr. Tom Girard, Storm Water Technician II            Mr. Dan Metz, Storm Water Technician I            Ms. Krissy Alban, Storm Water Technician I</p>
Training received and frequency:	<p>Medina County Highway Engineers stated that periodic training occurs although no set schedule for receiving training occurs.</p> <p>Training records are located in employee files maintained by Human Resources.</p>
How many inspectors for stormwater issues at construction projects? On average, number of projects each inspector is responsible for?	<p>Medina County Highway Engineers stated that five inspectors are available for storm water issues at construction sites.</p> <p>Mr. Dan Metz is responsible for 137 active commercial construction sites, Ms. Krissy Alban is responsible for 703 open storm water permits, and Mr. Conrad Sarnowski and Mr. Matt Martin are responsible for eleven residential subdivisions.</p>
How often are sites inspected?	<p>Medina County Highway Engineers stated that a monthly inspection rotation occurs; however, noncompliant sites are inspected more frequently.</p> <p>Medina County Highway Engineers stated that due to resource issues, the inspection frequency for residential construction sites is</p>

# MS4 AUDIT REPORT

<b>Construction Project Inspections</b>		
<b>Interview Questions</b>	<b>Response</b>	
What determines frequency?	<p>every two months due to resource issues. Medina County Highway Engineers also stated that the commencement of new residential construction is difficult to determine so the Medina County Building Department no notifies Medina County Highway Engineers when construction has been initiated.</p> <p>The inspection frequency is determined by the established monthly and two month rotations.</p>	
<p>Inspections triggered by rain events?</p> <p>What size rain event?</p> <p>How soon after the event?</p>	<p style="text-align: center;">No</p> <p style="text-align: center;">Not applicable</p> <p style="text-align: center;">Not applicable</p> <p>Inspections are not triggered by rain events as the inspection frequency is determined by the established monthly and two month rotations.</p> <p>Medina County Highway Engineers must verify that construction site operators are maintaining inspection logs in order to document that erosion and sediment BMP inspections are occurring weekly and within twenty-four hours of a 0.5 inch rainfall event or greater.</p>	
Standard inspection checklist used?	<p style="text-align: center;">Partially</p> <p>A "Stormwater Construction Site Inspection Report" has been developed for residential sites. No inspection checklist has been developed for commercial construction sites. Medina County Highway Engineers stated that only the approved SWP3 is utilized during commercial construction site inspections.</p>	
Findings tracked in a database?	<p style="text-align: center;">Yes</p> <p>Medina County Highway Engineers currently tracks construction projects electronically in a database.</p>	
<b>Applicable Documents</b>	<b>Reviewed</b>	<b>Obtained</b>
Most recent inspection staff training records	Not Available	Not Available
Example of active construction project inspection checklist	Yes	Yes
Records from inspection tracking database or filing system	Yes	No

# MS4 AUDIT REPORT

Notes
<p><b>Inspection Frequency</b></p> <p>Part III.B.4.d of the MS4 General Storm Water Permit establishes that the frequency of follow-up inspections shall be on a monthly basis unless Hinckley Township documents procedures for prioritizing inspections such as location to a waterway, amount of disturbed area, compliance of site, etc. The SWMP will have to be modified to address this new requirement of the MS4 General Storm Water Permit.</p>

Enforcement/Referrals													
Interview Questions	Response												
<p>Can construction inspectors administer enforcement actions?</p> <p>What types of enforcement actions?</p>	<p style="text-align: center;">Yes</p> <p>Medina County Highway Engineers construction inspectors can issue NOVs.</p> <p>Section 1.6 of the Medina E&amp;S Rules establishes that the CEO, Medina County Highway Engineers, and/or the Medina SWCD can report violations to the Medina BOC after a reasonable time for compliance, one week, after receipt of a letter for voluntary compliance. If the Medina BOC determines that a violation exists and requests the Medina CP in writing, the Medina CP shall seek an injunction or other appropriate relief to abate excessive erosion or sedimentation and secure compliance with the Medina E&amp;S Rules.</p> <p>Medina County Highway Engineers stated that Section 1.6 is a very slow process.</p>												
<p>Enforcement action is most commonly used:</p>	<p>NOV</p>												
<p>Enforcement actions tracked?</p> <p>How?</p>	<p>No</p> <p>Not applicable</p>												
<p>Average number of enforcement actions (by type) issued in the previous year:</p>	<table> <tr> <td>NOV</td> <td style="text-align: right;">Unknown</td> </tr> <tr> <td>Administrative fines</td> <td style="text-align: right;">Unknown</td> </tr> <tr> <td>ISWO</td> <td style="text-align: right;">Unknown</td> </tr> <tr> <td>Civil penalties</td> <td style="text-align: right;">Unknown</td> </tr> <tr> <td>Criminal penalties</td> <td style="text-align: right;">Unknown</td> </tr> <tr> <td>Other:</td> <td style="text-align: right;">Unknown</td> </tr> </table>	NOV	Unknown	Administrative fines	Unknown	ISWO	Unknown	Civil penalties	Unknown	Criminal penalties	Unknown	Other:	Unknown
NOV	Unknown												
Administrative fines	Unknown												
ISWO	Unknown												
Civil penalties	Unknown												
Criminal penalties	Unknown												
Other:	Unknown												
<p>Most common compliance issue on construction projects (i.e. tracking on streets, litter, inadequate concrete washout BMPs)?</p>	<p>The most common noncompliance issue is the failure to temporarily stabilize.</p>												
<p>Adequate legal authority and tools available to inspectors to enforce storm water requirements on construction projects?</p>	<p>No</p>												

# MS4 AUDIT REPORT

Enforcement/Referrals		
Interview Questions	Response	
If no, how could the program be improved?	The language provided within the Medina E&S Rules does not satisfy the minimum requirements established within Ohio EPA's General Construction Storm Water Permit. As detailed within an April 26, 2007 NOV, Medina County was required to pass a resolution by April 2006 for revised E&S Rules that, at a minimum, establishes the requirements and specifications within Ohio EPA's General Construction Storm Water Permit as baseline requirements.	
Who does follow up on enforcement actions?	Medina County Highway Engineers stated that the Medina CP and the Medina County Highway Engineers lead engineer would perform the follow up on enforcement actions.	
Applicable Documents	Reviewed	Obtained
Enforcement cases files both active and closed	Not Available	Not Available
Example of most typical enforcement action documentation (i.e. NOV)	Not Available	Not Available
List of enforcement actions used in the last year	Not Available	Not Available

Notes
<p><b><u>Enforcement Escalation Plan</u></b></p> <p>Please refer to the "Ordinance/Legal Authority Notes" within the "Construction Component Worksheet" section of this audit report for previously made comments.</p> <p><b><u>Construction Enforcement Tracking</u></b></p> <p>According to a December 29, 2008 Medina County Commissioners' MS4 audit response letter, a formal construction enforcement tracking mechanism has been implemented. The MS4 General Storm Water Permit will require the following information to be reported to Ohio EPA:</p> <ul style="list-style-type: none"> <li>• The number of applicable sites in Hinckley Township;</li> <li>• The number of pre-construction storm water pollution prevention plan reviews performed;</li> <li>• The number and frequency of site inspections;</li> <li>• The number of violation letters issued;</li> <li>• The number of enforcement actions taken; and</li> <li>• The number of complaints received and number followed up on.</li> </ul>

Outreach and Education	
Interview Questions	Response
Type of training provided to construction operators:	Medina County Highway Engineers stated that technical training for ODNR's RLD manual is provided to construction operators.
Attendance required?	Attendance is not required.

## MS4 AUDIT REPORT

Training frequency?	<b>Annually</b>	
Number of operators trained:	<p>According to Medina County Highway Engineers, a total of sixty-five operators were trained in March 2007 and a total of fifty operators were trained in March 2008.</p> <p>The above information conflicts with the information submitted by Medina SWCD entitled "Medina County Stormwater Management Plan Data." Medina County Highway Engineers must submit information (i.e. attendance records, copies of agendas, etc.) to verify that the March 2007 and March 2008 training sessions occurred.</p>	
Training topics:	<b>Not provided</b>	
	<p>Medina County Highway Engineers must submit the training topics that were covered during the March 2007 and March 2008 training sessions.</p>	
Presentations given by MS4 staff to professional groups?	<b>Yes</b>	
	<p>Presentations were given by MS4 staff to professional groups (i.e. consultants and engineers). Please refer to "Message Packaging Notes" section of this Audit Report for a comprehensive list of storm water messages developed by or utilized by Medina SWCD.</p>	
Brochures or outreach materials targeted at operators:	<p>No brochures and outreach materials have been developed to target construction operators. Medina County Highway Engineers stated that copies of slides and referrals to ODNR's RLD manual are utilized.</p>	
How/when is the information distributed?	<p>The outreach materials are distributed during presentations and during plan reviews.</p>	
Website used to educate operators?	<b>Yes</b>	
Web address:	<p>Medina County Highway Engineers stated that the website for Faircloth skimmer is utilized; however, Medina County Highway Engineers was unable to provide the web address.</p>	
<b>Applicable Documents</b>		<b>Reviewed</b>
<b>Obtained</b>		
Training materials	Not Available	Not Available
Brochures, outreach materials	Not Available	Not Available

<b>Notes</b>
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# MS4 AUDIT REPORT

Notes
<p><b><u>Training (BMP 22)</u></b></p> <p>The SWMP establishes an annual goal that Hinckley Township will sponsor or attend one construction site pollution control workshop annually. According to Hinckley Township records, construction site pollution control workshops were attended on January 1, 2005, September 25, 2007, February 13, 2008, and May 21, 2008.</p> <p><b><u>Storm Water Website</u></b></p> <p>Please refer to the “Message Packaging Notes” within the “Public Education/Involvement Component Worksheet” section of this audit report for previously made comments.</p> <p><b><u>Outreach Materials</u></b></p> <p>Ohio EPA highly recommends that outreach materials be developed and provided to the construction site operators regarding how erosion and sediment control BMPs should be properly installed and maintained. Part III.B.1.d of MS4 General Storm Water Permit states that “at least one theme or message shall be targeted to the development community.” The SWMP will have to be modified to address this new requirement of the MS4 General Storm Water Permit.</p>

<b>MS4-Owned Construction Projects</b>	
<b>Interview Questions</b>	<b>Response</b>
Projects designed in-house or contracted?	<p style="text-align: center;">Unknown</p> <p>MS4-owned construction project SWP3s are designed by the Medina department performing the project (i.e. a SWP3 for new sanitary sewer extension would be developed by the Medina County Sanitary Engineers (Medina SE)).</p>
Designers trained in stormwater BMP implementation?	<p style="text-align: center;">Unknown</p> <p>Medina County Highway Engineers did not know if other Medina County departments designing SWP3s have received training in storm water BMP implementation.</p>
Checklist used during the design and/or review of public construction projects?	<p style="text-align: center;">Unknown</p> <p>Medina County Highway Engineers did not know if other Medina County departments designing SWP3s utilize a checklist during the design and/or review of public construction projects.</p> <p>Section 3.7 of the Medina E&amp;S Rules establishes an Erosion and Sediment Control Plan checklist that should be included in a narrative and on a site plan.</p>

# MS4 AUDIT REPORT

<b>MS4-Owned Construction Projects</b>			
<b>Interview Questions</b>	<b>Response</b>		
	<p>In addition, Medina County Highway Engineers provided two additional checklists that are utilized by employees when reviewing plans. The checklists are entitled "Commercial Site Plan Review Checklist" and "Subdivision Construction Drawings Review Checklist" and contain erosion and sediment control components.</p>		
Are projects greater than one acre covered a general construction permit (has an NOI been submitted)?	<p><b>Unknown</b></p> <p>Medina County Highway Engineers did not know if MS4-owned projects greater than one acre received coverage under the General Construction Storm Water Permit.</p>		
If contracted planners and engineers are used for the design of MS4-owned projects, does the contract language specify that storm water BMPs be incorporated into the design?	<p><b>Unknown</b></p> <p>Medina County Highway Engineers did not know if contract language specified that storm water BMPs be incorporated into the design of MS4-owned projects when contracted planners and engineers are utilized to design of MS4-owned projects.</p>		
In-house inspection staff inspect projects? If so, which department?	<p><b>No</b></p> <p>In-house inspection staff do not inspect MS4-owned projects.</p>		
Project inspectors trained?	<p><b>Unknown</b></p>		
Frequency:	<p>Medina County Highway Engineers does not perform inspections of MS4-owned projects.</p>		
If contracted inspectors are utilized, are minimum inspection, maintenance and reporting requirements specified in the contract?	<p><b>No</b></p> <p>Medina County Highway Engineers stated that minimum inspection, maintenance, and reporting requirements would be the responsibility of the project engineer.</p>		
<b>Applicable Documents</b>		<b>Reviewed</b>	<b>Obtained</b>
MS4-owned project storm water design standards and/or checklist		Not Available	Not Available
Contract language for active public project not developed or inspected in-house		Not Available	Not Available

<b>Notes</b>
<p><b>Documentation (BMP 23)</b></p> <p>The SWMP establishes an annual goal that one hundred percent (100%) of proposed subdivision development projects requiring a zoning change are advertised and public has several means of providing input. According to the 2008 annual report, "no [new] subdivisions [have been proposed]"</p>

## MS4 AUDIT REPORT

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### Notes

within the designated phase II area.”

#### Annual Program Assessment (BMP 24)

The SWMP establishes an annual goal that affected agencies will meet at least once per year to assess current policies and procedures and update as necessary. According to Hinckley Township records, BMP 24 has not been satisfied; however according to the 2008 annual report, “this action was accomplished during meetings held February 2, 2009 and November 6, 2008.” Hinckley Township must submit information (i.e. meeting agendas and attendance records) to Ohio EPA that documents that the MCM requirements have been satisfied.

#### MS4-Owner Construction Projects

Hinckley Township must submit information to Ohio EPA that details if the Medina County Highway Engineers would be performing both SWP3 reviews and the erosion and sediment control inspections at Hinckley Township-owned construction projects. MS4 owned construction projects can encompass roadway improvements, sanitary sewer and water line extensions and replacements, park construction, building construction, etc. SWP3 review and construction site inspection checklists must be utilized. Please refer to the “Construction Project Inspections Notes” and “Plan Review Procedures Notes” within the “Construction Component Worksheet” section of this audit report for previously made comments.

#### MS4-Owned Project SWP3 Review Checklist

Please refer to the “Plan Review Procedures Notes” within the “Construction Component Worksheet” section of this audit report for previously made comments.

#### MS4-Owned Project Inspection Checklist

Please refer to the “Construction Project Inspections Notes” within the “Construction Component Worksheet” section of this audit report for previously made comments.

# MS4 AUDIT REPORT

## Post-Construction Component Worksheet

<b>Date of Evaluation</b> May 12, 2008
<b>Evaluator Name, Title</b> Chris Moody Environmental Specialist
<b>MS4 Permittee</b> Medina County

**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
Mr. Andy Conrad Assistant County Engineer	Medina County Highway Engineers	(330)723-9559 aconrad@medinaco.org
Mr. Dan Willhoite Civil Engineer III	Medina County Highway Engineers	(330) 723-9573 dwillhoite@medinaco.org
Mr. Jeff Van Loon Manager	Medina SWCD	(330) 722-2628 juanloon@medinaco.org

Medina County Highway Engineers stated that, at the time of the Hinckley Township MS4 audit, the Hinckley Township audit findings for MCM 5 would be the same as the May 12, 2008 Medina County MS4 audit findings. Therefore, the Hinckley Township MS4 audit findings are reflective of the information detailed within the May 12, 2008 Medina County MS4 audit "Post-Construction Component Worksheet."

Ordinance/Legal Authority	
Interview Questions	Response
Ordinance used to require post-construction stormwater BMPs on new development or redevelopment projects?  Name and/or code section(s).	No  Medina County has not passed a resolution to require post-construction storm water BMPs on new development or redevelopment projects, to ensure that the long term operation and maintenance of post-construction BMPs occur, and to establish enforcement authority to resolve non-compliance. As detailed within an April 26, 2007 NOV and in accordance with Part 3.2.5.1.3 of the MS4 General Permit, Medina County was required to pass a resolution by April 2006 for revised E&S Rules that, at a minimum, establish the requirements and specifications within Ohio EPA's General Construction Storm Water Permit as baseline requirements.
Threshold for coverage (e.g., 1 acre, 100 cubic yards,	Not applicable due to a lack of resolution

# MS4 AUDIT REPORT

Ordinance/Legal Authority		
Interview Questions	Response	
etc.)	passage to require post-construction storm water BMPs on new development or redevelopment projects.	
Exclusions from coverage allowed:	Not applicable due to a lack of resolution passage to require post-construction storm water BMPs on new development or redevelopment projects.	
Permitting mechanism used to require appropriate BMPs (i.e. building permit):	Median County does not have a permitting mechanism to require post-construction storm water BMPs due to a lack of resolution passage to require post-construction storm water BMPs on new development or redevelopment projects.	
Is a plan required (erosion control plan or SWPPP)?	Yes	
Are minimum post-construction site BMPs specified?	No	
What types?	Medina County Highway Engineers stated that post-construction designs for maintenance are recommended.	
Applicable Documents	Reviewed	Obtained
Ordinance(s)	Not Available	Not Available

Notes
<p><b><u>Storm Water Management (BMP 26)</u></b></p> <p>The SWMP establishes that updated Medina E&amp;S Rules were to be adopted by April 1, 2005. The MS4 General Storm Water Permit required that revised E&amp;S Rules be adopted by April 1, 2006. Medina County Commissioners were notified via a NOV letter, dated April 26, 2007, that Medina County had failed to adopt revised post-construction regulations. According to a July 14, 2009 Hinckley Township letter, the updated post-construction regulations have a target date of September or October 2009 for adoption.</p> <p><b><u>Implementation and Enforcement (BMP 27)</u></b></p> <p>Please refer to the "Ordinance/Legal Authority" and "Plan Review Procedures Notes" sections within the "Construction Component Worksheet" section of this audit report for previously made comments.</p> <p>Ohio EPA recommends that coordination occur between Hinckley Township and Medina County Highway Engineers, which are implementing portions of the SWMP when an enforcement action has been initiated on a construction site. Hinckley Township should consider not issuing local zoning and/or building permits on construction sites where an enforcement action has been initiated until the documented violations are resolved.</p> <p><b><u>Alternative Post-Construction BMPs</u></b></p> <p>Please be advised that the use of alternative structural post-construction BMPs are permitted in</p>

# MS4 AUDIT REPORT

limited scenarios, in accordance with Part III.G.2.e of the General Construction Storm Water Permit, require approval by Ohio EPA prior to installation, and must demonstrate equivalent effectiveness. To demonstrate equivalent effectiveness, the permittee must show that the alternative BMP has a minimum total suspended solids (TSS) removal efficiency of 80 percent. Also, the water quality volume (WQv) discharge rate from the practice must be reduced to prevent stream bed erosion and protect the physical and biological stream integrity unless there will be negligible hydrological impact to the receiving surface water of the State. The discharges will have a negligible impact if the permittee can demonstrate that one of the following four conditions exist:

- i. The entire WQv is recharged to groundwater;
- ii. The larger common plan of development or sale will create less than one acre of impervious surface;
- iii. The project is a redevelopment project within an ultra-urban setting (i.e., a downtown area or on a site where 100 percent of the project area is already impervious surface and the storm water discharge is directed into an existing storm sewer system); or
- iv. The storm water drainage system of the development discharges directly into a large river (fourth order or greater) or to a lake and where the development area is less than 5 percent of the watershed area upstream of the development site, unless a TMDL identified water quality problems in the receiving surface waters of the State.

Alternative practices may include, but are not limited to, underground detention structures, vegetated swales and vegetated filter strips designed using water quality flow, natural depressions, rain barrels, permeable pavements green roofs, rain gardens, catch basin inserts, and hydrodynamics separators.

<b>Construction Requirements and BMPs</b>			
<b>Interview Questions</b>		<b>Response</b>	
Technical guidance provided or required?		Yes	
Guidance include selection criteria (i.e. based on land use, location)?		No	
Guidance include operation and maintenance requirements?		No	
<b>Applicable Documents</b>		<b>Reviewed</b>	<b>Obtained</b>
BMP guidance or technical document		Not Available	Not Available

<b>Notes</b>
No additional comments.

<b>Plan Review Procedures</b>	
<b>Interview Questions</b>	<b>Response</b>
Who performs post-construction BMP plan review (i.e. planning department, building department)?	Medina County Highway Engineers performs post-construction BMP plan review. According to Medina County Highway Engineers, a two year performance bond inspection is performed that is premised upon water quantity aspects.
Training received and frequency:	Medina County Highway Engineers stated that periodic training occurs although no set schedule for receiving training occurs.  Training records are located in employee files maintained by Human Resources.

## MS4 AUDIT REPORT

Plan Review Procedures			
Interview Questions	Response		
Size threshold for plan review (i.e. 1 acre, 10,000 square feet)?	Medina County Highway Engineers stated that the size threshold for plan review is 5,000 square feet; however, this conflicts with Section 1.4(B) of the Medina E&S Rules, which states that if a site disturbs less than 20,000 square feet and more than 5,000 square feet on five or more contiguous acres of land owned by one person or operated as one development unit, a Stormwater and Sediment Control Plan is not required to be filed.		
Pre-project meetings conducted with developer?	Yes		
Standard conditions of approval include post-construction storm water requirements?	<p>Yes</p> <p>Medina County Highway Engineers provided a permit attachment that provides a list of standard conditions of approvals that includes the following requirement which includes post-construction BMPs:</p> <ul style="list-style-type: none"> <li>• “It shall be the owner’s responsibility to obtain any other required agency approvals, including, but not limited to Army Corps of Engineers (e.g. Wetlands) OEPA (e.g. Stormwater Discharge Permitting), Township Zoning, and O.D.O.T.”</li> </ul>		
Plan review criteria or checklist used?	<p>No</p> <p>Medina County Highway Engineers has not developed plan review criteria or a checklist for post-construction BMPs.</p>		
Maintenance agreement required?	<p>No</p> <p>Medina County Highway Engineers stated that drainage maintenance funds are established for public subdivisions.</p>		
	<b>Applicable Documents</b>	<b>Reviewed</b>	<b>Obtained</b>
	Copy of standard conditions of approval	Yes	Yes
	Example of standard conditions applied to an approved project	Yes	Yes
	Checklist used by plan reviewers	Not Available	Not Available

Notes
<p><b><u>SWP3 Review Guidance Document</u></b></p> <p>According to the 2007 annual report, one hundred percent (100%) of SWP3s are reviewed and approved. Medina County Highway Engineers stated that ODNR’s RLD manual is utilized as the guidance document; however, SWP3 reviews and construction site inspections have revealed that incorrect post-construction storm water management BMPs have been designed or have not been designed for and installed on the portions of a site not draining to an extended detention or retention basin. Both scenarios do not comply with the requirements of the General Construction Storm Water Permit. When reviewing SWP3s, Medina County Highway Engineers must ensure that all of the erosion and sediment BMPs are designed in accordance with the specifications established within Medina County’s technical guidance document, ODNR’s RLD manual.</p>

## **MS4 AUDIT REPORT**

Part III.B.5.f. of the MS4 General Storm Water Permit requires MCM No. 5 to include pre-construction storm water pollution prevention plan review of all projects from construction activities that result in a land disturbance of greater than or equal to one acre to ensure that required controls are designed per requirements. These applicable sites shall be inspected to ensure that controls are installed per requirements. The SWMP will have to be modified to address these new requirements of the MS4 General Storm Water Permit once it goes final. The SWMP must be revised to address these new requirements.

**NOTE:** Ohio EPA does not review the SWP3 prior to General Construction Storm Water Permit issuance. Thus, General Construction Storm Water Permit issuance does not demonstrate that the SWP3 satisfies Ohio EPA requirements.

### **SWP3 Checklist (BMP 27)**

The MS4 General Storm Water Permit establishes that the SWMP include “[p]rocedures for site plan review which incorporate consideration of potential water quality impacts.” Medina County Highway Engineers must develop a SWP3 review checklist to address post-construction storm water management for all construction sites in order to allow for consistent reviews to occur and will also provide a training mechanism for new employees. According to a December 29, 2008 Medina County Commissioners MS4 audit response letter, “Medina County does not have ability to enforce the regulations of any other agency.” Upon adoption of the updated post-construction regulations, Medina County must develop a SWP3 review checklist that will be utilized to ensure submitted SWP3s are complete.

Ohio EPA highly recommends that one SWP3 review checklist be developed for all construction sites that disturb one acre or larger or less than one acre of disturbance and are part of a larger common plan of development because the requirements established within the General Construction Storm Water Permit do not change for the different zoning types of construction site. For your convenience, Ohio EPA has developed a SWP3 construction site review checklist, which is available at the following internet address:

[http://www.epa.state.oh.us/dsw/storm/const\\_SWP3\\_check.html](http://www.epa.state.oh.us/dsw/storm/const_SWP3_check.html)

### **Training (BMP 28)**

The SWMP establishes an annual goal that Hinckley Township will sponsor or attend one construction site pollution control workshop annually. According to Hinckley Township records, construction site pollution control workshops were attended on January 1, 2005, September 25, 2007, February 13, 2008, March 11, 2008, and May 21, 2008.

### **Annual Program Assessment (BMP 29)**

The SWMP establishes an annual goal that affected agencies will meet at least once per year to assess current policies and procedures and update as necessary. According to Hinckley Township records, BMP 29 has not been satisfied; however, according to the 2008 annual report, “this action was accomplished.” Hinckley Township must submit information (i.e. meeting agendas and attendance records) to Ohio EPA that documents that the MCM requirements have been satisfied.

### **Post-Construction BMP Selection Criteria**

## MS4 AUDIT REPORT

According to the SWMP, “storm water basins are required in Medina County for the sole purpose of controlling storm water quantity. Medina County Highway Engineers must revise the Medina E&S Rules to include the standard post-construction storm water management BMPS established within the General Construction Storm Water Permit, refer to table below. The standard post-construction storm water management BMPS shall be designed such that the drain time is long enough to provide treatment, but short enough to provide storage for successive rainfall events and avoid the creation of nuisance conditions. The current Medina E&S Rules only address critical storm management and do not address the WQv requirement of the General Construction Storm Water Permit.

Best Management Practice	Drain Time of WQv (hours)
Infiltration Basin <sup>^</sup>	24 - 48
Enhanced Water Quality Swale	24
Dry Extended Detention Basin*	48
Wet Extended Detention Basin**	24
Constructed Wetland (above permanent pool)+	24
Sand & Other Media Filtration	40
Bioretention Cell <sup>^</sup>	40
Pocket Wetland#	24
Vegetated Filter Strip	24
* Dry basins must include forebay and micropool each sized at 10% of the WQv ** Provide both a permanent pool and an EDv above the permanent pool, each sized at 0.75* WQv + Extended detention shall be provided for the full WQv above the permanent water pool. ^ The WQv shall completely infiltrate within 48 hours so there is no standing or residual water in the BMP. # Pocket wetlands must have a wet pool equal to the WQv, with 25% of the WQv in a pool and 75% in marshes. The EDv above the permanent pool must be equal to the WQv.	

### Operation and Maintenance

The MS4 General Storm Water Permit establishes that the SWMP include “[h]ow you will ensure the long-term operation and maintenance of your selected BMPs. Options to help ensure that future operation and maintenance responsibilities are clearly identified include an agreement between you and another party such as the post-development landowners or regional authorities.” Medina County Highway Engineers must establish a formal procedure (i.e. maintenance agreements, easements, deed restrictions, etc.) to ensure that post-construction storm water management BMPs installed on all residential, commercial, and industrial construction and redevelopment sites will operate and be maintained in perpetuity.

Part III.B.5.f. of the MS4 General Storm Water Permit requires MCM No. 5 requires Hinckley Township to ensure that long-term operation and maintenance plans are developed and agreements in place for all applicable sites. The SWMP will have to be modified to address this new requirement of the MS4 General Storm Water Permit.

Post-Construction BMP Inventory	
Interview Question	Response
Post-construction structural BMPs tracked?	No



# MS4 AUDIT REPORT

Post-Construction BMP Inspection and Maintenance		
Interview Questions	Response	
Most recent staff training records	Not Available	Not Available
Example of BMP inspection checklist	Not Available	Not Available
Records from inspection tracking database or filing system	Not Available	Not Available

Notes
<p><b><u>Inspection Checklist</u></b></p> <p>The MS4 General Storm Water Permit establishes that the SWMP include “[p]rocedures for site inspection... of control measures.” Medina County Highway Engineers must begin utilizing a post-construction storm water management BMP inspection checklist for every construction site, regardless of size and zoning type, as this will allow for consistent site inspections to occur and will also provide a training mechanism for new employees during transitional periods.</p> <p><b><u>Operation and Maintenance</u></b></p> <p>Please refer to the “Plan Review Procedures Notes” within the “Post-Construction Component Workshop” section of this audit report for previously made comments.</p>

Enforcement/Referrals													
Interview Questions	Response												
Can inspectors administer enforcement actions if private post-construction BMPs are not maintained?	No												
If no, who can?	Not applicable due to a lack of resolution passage to require post-construction storm water BMPs on new development or redevelopment projects.												
If yes, what types of enforcement actions?													
Enforcement action is most commonly used:	Not applicable due to a lack of resolution passage to require post-construction storm water BMPs on new development or redevelopment projects.												
Enforcement actions tracked?	Not applicable due to a lack of resolution passage to require post-construction storm water BMPs on new development or redevelopment projects.												
How?													
Average number of enforcement actions (by type) issued in the previous year:	<table> <tr> <td>Notices of Violations (NOV)</td> <td>0</td> </tr> <tr> <td>Administrative fines</td> <td>0</td> </tr> <tr> <td>Stop-work orders</td> <td>0</td> </tr> <tr> <td>Civil penalties</td> <td>0</td> </tr> <tr> <td>Criminal penalties</td> <td>0</td> </tr> <tr> <td>Other:</td> <td>0</td> </tr> </table>	Notices of Violations (NOV)	0	Administrative fines	0	Stop-work orders	0	Civil penalties	0	Criminal penalties	0	Other:	0
Notices of Violations (NOV)	0												
Administrative fines	0												
Stop-work orders	0												
Civil penalties	0												
Criminal penalties	0												
Other:	0												
Adequate legal authority and tools available to inspectors to enforce post-construction storm water requirements?	Medina BOC has not passed a resolution to require post-construction storm water BMPs on new development or redevelopment projects. As detailed within an April 26,												

# MS4 AUDIT REPORT

Enforcement/Referrals		
Interview Questions	Response	
If no, how could the program be improved?	<p>2007 NOV and in accordance with Part 3.2.5.1.3 of the MS4 General Permit, Medina County was required to pass a resolution by April 2006 for revised E&amp;S Rules that, at a minimum, establish the requirements and specifications within Ohio EPA's General Construction Storm Water Permit as baseline requirements, which includes having the legal authority and tools available for the MS4 to enforce post-construction storm water requirements.</p> <p>Medina County must develop and pass a resolution to require post-construction storm water management BMPs on new development or redevelopment projects, to ensure that the long term operation and maintenance of post-construction BMPs occur, and to establish enforcement authority to resolve non-compliance. Passing a resolution that is, at a minimum, at least as stringent as Ohio EPA's General Construction Storm Water Permit is required. Developing a formal enforcement escalation plan or protocol is also required to aid the site inspectors when noncompliance issues are documented.</p>	
Who does follow up on enforcement actions?	Not applicable due to a lack of resolution passage to require post-construction storm water BMPs on new development or redevelopment projects.	
Applicable Documents	Reviewed	Obtained
Enforcement cases files both active and closed	Not Available	Not Available
Example of most typical enforcement action documentation (i.e. NOV)	Not Available	Not Available
List of enforcement actions used in the last year	Not Available	Not Available

Notes
<p><b><u>Medina E&amp;S Rules</u></b></p> <p>Please refer to the "Ordinance/Legal Authority Notes" within the "Post-Construction Component Worksheet" section of this audit report for previously made comments.</p> <p><b><u>Enforcement Escalation Plan</u></b></p> <p>Please refer to the "Ordinance/Legal Authority Notes" within the "Post-Construction Component Worksheet" section of this audit report for previously made comments.</p>

# MS4 AUDIT REPORT

## Notes

### Post-Construction Enforcement Tracking

Medina County Highway Engineers must develop a formal post-construction enforcement tracking mechanism to ensure that if enforcement is pursued through the post-construction enforcement escalation plan, the corrective action requirements are complied with. In addition, Ohio EPA will require the number of post-construction enforcement actions pursued to be submitted in each future SWMP annual report. For your convenience, Ohio EPA's annual report form can be obtained from the following internet address:

[http://www.epa.state.oh.us/dsw/permits/SmallMS4\\_Draft\\_GP\\_dec07.html](http://www.epa.state.oh.us/dsw/permits/SmallMS4_Draft_GP_dec07.html)

## Outreach and Education

Interview Questions	Response
Type of training provided to designers and engineers:	Medina County Highway Engineers stated that technical training for ODNR's RLD manual is provided to construction operators.
Attendance required?	Attendance is not required.
Training frequency?	Annually
Number trained:	According to Medina County Highway Engineers, a total of sixty-five operators were trained in March 2007 and a total of fifty operators were trained in March 2008.  The above information conflicts with the information submitted by Medina SWCD entitled "Medina County Stormwater Management Plan Data." Medina County Highway Engineers must submit information (i.e. attendance records, copies of agendas, etc.) to verify that the March 2007 and March 2008 training sessions occurred.
Training topics:	Not provided  Medina County Highway Engineers must submit the training topics that were covered during the March 2007 and March 2008 training sessions.
Presentations given by MS4 staff to professional groups?	Yes  Presentations were given by MS4 staff to professional groups (i.e. consultants and engineers). Please refer to "Message Packaging" section of this Audit Report for a comprehensive list of storm water messages developed by or utilized by Medina SWCD.
Brochures or outreach materials targeted at designers and engineers:	No brochures and outreach materials have been developed to target designers and engineers. Medina County Highway Engineers stated that copies of slides and

# MS4 AUDIT REPORT

Outreach and Education		
Interview Questions	Response	
	referrals to ODNR's RLD manual are utilized.	
How/when is the information distributed?	The outreach materials are distributed during presentations and during plan reviews.	
Website used to educate designers and engineer?  Web addresses:	<p style="text-align: center;">No</p> <p>Although, not websites were provided, Medina SWCD website does provide information to the general public regarding a March 11, 2008 ODNR Design of Stormwater Facilities Seminar.</p> <p style="text-align: center;"><a href="http://www.medinaswcd.org/urban.htm">http://www.medinaswcd.org/urban.htm</a></p>	
Applicable Documents	Reviewed	Obtained
Training materials	Not Available	Not Available
Brochures, outreach materials	Yes	No

Notes
<p><u>Storm Water Website</u></p> <p>Please refer to the "Message Packaging Notes" within the "Public Education/Involvement Component Worksheet" section of this audit report for previously made comments.</p> <p><u>Outreach Materials</u></p> <p>Ohio EPA highly recommends that outreach materials be developed and provided to the construction site operators regarding how post-construction storm water management BMPs should be properly installed and maintained. Part III.B.1.d of MS4 General Storm Water Permit states that "at least one theme or message shall be targeted to the development community." The SWMP will have to be modified to address this new requirement of the MS4 General Storm Water Permit.</p>

MS4-Owned Construction Projects	
Interview Questions	Response
Projects designed in-house or contracted?	Medina County Highway Engineers stated that both in-house staff and contracted consultants are utilized. Medina County Highway Engineers stated that the larger, more complex construction projects would be designed by contracted consultants.
Designers trained in post-construction stormwater BMP implementation?	<p style="text-align: center;">Yes</p> <p>Medina County Highway Engineers received training during a March 11, 2008 workshop entitled "Design of Stormwater Retention Basins."</p>

# MS4 AUDIT REPORT

<b>MS4-Owned Construction Projects</b>		
<b>Interview Questions</b>	<b>Response</b>	
Checklist used during the design and/or review of post-construction BMPs?	Medina County Highway Engineers stated that no checklists are utilized during the design and/or review of post-construction BMPs.	
If contracted planners and engineers are used for the design of MS4-owned projects, does the contract language specify that post-construction storm water BMPs be incorporated into the design?	Medina County Highway Engineers stated that if contracted planners and engineers are used for the design of MS4-owned projects, Medina County would perform the design, review and inspections.	
In-house inspection staff inspect post-construction BMPs? If so, which department?	Medina County Highway Engineers only performs post-construction public water quantity inspections. Medina County Highway Engineers then stated that if the post-construction orifice is set at the incorrect elevation and impacts the water quantity aspects, maintenance would be required. In addition, Medina County Highway Engineers further stated that if the designs include a post-construction BMP, in-house staff would perform the post-construction BMP inspection.	
Post-construction inspectors trained?  Frequency:	Medina County Highway Engineers stated that periodic training occurs although no set schedule for receiving training occurs.  Training records are located in employee files maintained by Human Resources.	
If contracted inspectors are utilized, are minimum inspection, maintenance and reporting requirements specified in the contract?	Medina County Highway Engineers stated that if contracted inspectors are utilized, minimum inspection, maintenance, and reporting requirements would be established; however, minimum requirements would vary from construction site to construction site.	
<b>Applicable Documents</b>	<b>Reviewed</b>	<b>Obtained</b>
Project storm water design standards and/or checklist	Not Available	Not Available
Contract language for active public project not developed or inspected in-house	Not Available	Not Available

<b>Notes</b>
<p><b>MS4-Owner Construction Projects</b></p> <p>Hinckley Township must submit information to Ohio EPA that details if the Medina County Highway Engineers would be performing both SWP3 reviews and the post-construction storm water management BMP inspections at Hinckley Township-owned construction projects. MS4 owned construction projects can encompass roadway improvements, sanitary sewer and water line extensions and replacements, park construction, building construction, etc. SWP3 review and post-construction storm water management BMP inspection checklists must be utilized. Please refer to</p>

## **MS4 AUDIT REPORT**

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### **Notes**

the “Post-Construction BMP Inspection and Maintenance Notes” and “Plan Review Procedures Notes” within the “Post-Construction Component Worksheet” section of this audit report for previously made comments.

#### **MS4-Owned Project SWP3 Review Checklist**

Please refer to the “Plan Review Procedures Notes” within the “Post-Construction Component Worksheet” section of this audit report for previously made comments.

#### **MS4-Owned Project Inspection Checklist**

Please refer to the “Post-Construction BMP Inspection and Maintenance Notes” within the “Post-Construction Component Worksheet” section of this audit report for previously made comments.

# MS4 AUDIT REPORT

## Illicit Discharge Component Worksheet

<b>Date of Evaluation</b> March 2, 2009
<b>Evaluator Name, Title</b> Chris Moody Environmental Specialist
<b>MS4 Permittee</b> Hinckley Township

**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
Mr. Jim Kamps Storm Water Management Plan Coordinator / Zoning Commission Chairman	Hinckley Township Zoning Commission	(330) 278-4181 jkamps@hinckleytwp.org
Mr. Jeff Van Loon Manager	Medina SWCD	(330) 722-2628 jvanloon@medinaco.org
Mr. Paul Magovac Foreman	Hinckley Township Street Department	(330) 225-2276 pmagovac@hinckleytwp.org
Mr. Gary Norcia Watershed Coordinator	Medina SWCD	(330) 722-2628 gnorcia@medinaco.org
Mr. Charles Pope Zoning Inspector	Hinckley Township Zoning Department	(330) 278-2463 cpope@hinckleytwp.org

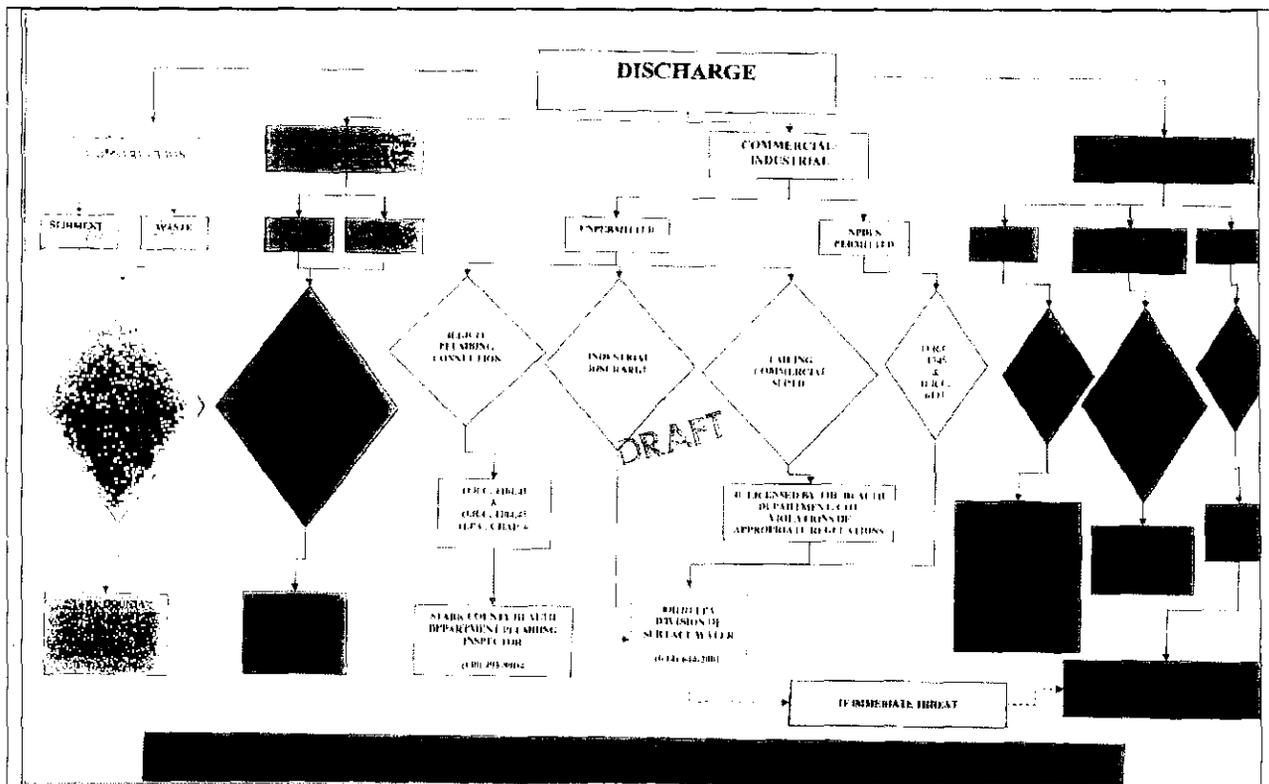
Ordinance/Legal Authority											
Interview Questions	Response										
Ordinance which prohibits illicit discharges?  Name and/or code section(s).	Yes  According to the 2008 annual report, "Chapter 29 of the Medina County Sanitary Code took effect July 17, 2007." Hinckley Township must submit information to Ohio EPA that details the ordinance that is utilized to address illicit discharges that are not from failing septic systems.										
Exclusions (non-stormwater discharges) allowed:	The SWMP states that "a list of occasional non-storm water discharges (e.g. non-commercial or charity car washes – as well as any of activities listed above will be developed as the jurisdiction encounters pollution prevention problems related to these events.										
Types of enforcement mechanisms available:	<table border="0"> <tr> <td>Notices of Violations (NOV)</td> <td>Unknown</td> </tr> <tr> <td>Administrative fines</td> <td>Unknown</td> </tr> <tr> <td>Stop-work orders</td> <td>Unknown</td> </tr> <tr> <td>Civil penalties</td> <td>Unknown</td> </tr> <tr> <td>Criminal penalties</td> <td>Unknown</td> </tr> </table>	Notices of Violations (NOV)	Unknown	Administrative fines	Unknown	Stop-work orders	Unknown	Civil penalties	Unknown	Criminal penalties	Unknown
Notices of Violations (NOV)	Unknown										
Administrative fines	Unknown										
Stop-work orders	Unknown										
Civil penalties	Unknown										
Criminal penalties	Unknown										

# MS4 AUDIT REPORT

<p>Official enforcement escalation plan or procedures in place?</p>	<p>Other: The 2008 annual report states that “applicable regulations exist for enforcement.” Hinckley Township must submit information to Ohio EPA that details Hinckley Township’s enforcement escalation plan or procedures.</p>	
<b>Applicable Documents</b>	<b>Reviewed</b>	<b>Obtained</b>
Ordinance(s) prohibiting illicit discharges	Not Available	Not Available
Enforcement escalation plan or procedures	Not Available	Not Available

<b>Notes</b>
<p><u><b>Enforcement Escalation Plan</b></u></p> <p>The MS4 General Storm Water Permit establishes that the SWMP include a “plan to ensure through appropriate enforcement procedures and actions that your illicit discharge ordinance (or other regulatory mechanism) is implemented.” Hinckley Township must submit information to Ohio EPA documenting why the MCM requirement, provided above, has not been satisfied and a revised schedule as to when the BMP is expected to be completed. A copy of the Hinckley Township enforcement escalation plan must also be submitted to Ohio EPA for review.</p> <p><u><b>Illicit Discharge Detection and Elimination Regulation (BMP 16)</b></u></p> <p>The MS4 General Storm Water Permit establishes that “to the extent allowable under State or local law, effectively prohibit, through ordinance, or other regulatory mechanism, illicit discharges into your storm sewer system and implement appropriate enforcement procedures and actions.” An illicit discharge detection and elimination protocol must be developed by the Hinckley Township that depicts how illicit discharge events will be addressed and by which Hinckley Township and/or Medina County agency. Please refer to the below flow chart that has been developed. Hinckley Township must submit a revised schedule as to when the BMP is expected to be completed. A copy of the Hinckley Township illicit discharge detection and elimination protocol must also be submitted to Ohio EPA for review.</p>

# MS4 AUDIT REPORT



## Non-Storm Water Discharges (BMP 17)

The SWMP establishes that “a list of occasional non-storm water discharges (e.g. non-commercial or charity car washes – as well as any of activities listed above will be developed as the jurisdiction encounters pollution prevention problems related to these events.” Hinckley Township must submit a copy of the list of occasional non-storm water discharges that have caused pollution prevention problems to Ohio EPA.

<b>Dry-Weather Screening</b>	
<b>Interview Question</b>	<b>Response</b>
Map of MS4 system complete?	Yes
If yes, hard copy or electronic?	Hard copies of the MS4 map are both available. Please refer to the “MS4 Mapping Notes” within the “MS4 Maintenance Component Worksheet” section of this audit report for previously made comments.
Who can access the map and for what purpose?	The maps are available to the public.
Dry-weather field screening used to detect illicit discharges?	Hinckley Township is not performing dry-weather screening.
Frequency and extent of field screening (i.e. 30 percent of major outfalls annually):	The SWMP established the following goals of performing dry-weather screenings: <ol style="list-style-type: none"> <li>1. Adopt “How to” policies for dry weather observation program and develop a method of priority areas;</li> </ol>

# MS4 AUDIT REPORT

Dry-Weather Screening			
Interview Question	Response		
	2. 25% of storm sewer outfalls inspected; starting with identified areas from year 1; 3. 25% of storm sewer outfalls inspected; 4. 25% of storm sewer outfalls inspected; and 5. 25% of storm sewer outfalls inspected;  Hinckley Township is not performing dry weather screening.		
Areas for screening prioritized?	According to the 2008 annual report priority areas have been established for performing dry weather screening.		
Criteria used:	The SWMP states "areas with a greater likelihood of illicit connections (e.g. areas with older sanitary sewer lines) will be ranked with a higher priority."		
Checklist or reporting form utilized?	No  Hinckley Township is not performing dry weather screening.		
Dry-weather flows sampled and analyzed?	No  Hinckley Township is not performing dry weather screening.		
Dry-weather screening findings tracked?	No		
Database used?	No		
Data tracked:	Data is not currently tracked as Hinckley Township is not performing dry-weather screening.		
	<b>Applicable Documents</b>	<b>Reviewed</b>	<b>Obtained</b>
	Summary of field screening findings from previous year	Not Available	Not Available
	Written description of dry-weather field screening procedures	Yes	No
	Checklist or reporting form	Yes	No

Notes
<p><b><u>Dry Weather Screening (BMP 18)</u></b></p> <p>The MS4 General Storm Water Permit establishes that the SWMP "...must include dry weather field screening for non-storm water flows." The SWMP establishes a 2004 of adopting "how to" policies for dry weather observation program and develop a method of priority areas." In addition, the SWMP establishes an annual goal, beginning in 2005, that twenty-five percent (25%) of storm sewer outfalls are to be dry weather screened, commencing with the identified priority areas</p>

## MS4 AUDIT REPORT

<b>Notes</b>
<p>developed in 2004. According to information provided by Hinckley Township, a MOU was signed with the Medina County Commissioners stating that Hinckley Township would be responsible for performing dry-weather screening within the urbanized area of Hinckley Township. Hinckley Township stated that dry-weather screening is not being performed. Hinckley Township must submit information to Ohio EPA documenting why the MCM requirement, provided above, has not been satisfied and a revised schedule as to when the BMP is expected to be completed. Ohio EPA recommends field tests of selected chemical parameters as indicators of discharge sources.</p> <p>Part III.B.3.k of the MS4 General Storm Water Permit requires that Hinckley Township must develop a plan that shall include dry weather field screening for non-storm water flows. The plan must describe the mechanisms and strategies that will be implemented to ensure outfalls which have previously been dry-weather screened will not have future illicit connections. In addition, Hinckley Township will have to report the number of outfalls dry-weather screened and the number of dry-weather flows identified.</p>

<b>Investigation of Illicit Discharges</b>		
<b>Interview Questions</b>	<b>Response</b>	
Investigation procedure adopted?	Yes	
Summary of process used:	Hinckley Township relies on the Medina County Health Department, which utilizes the July 2006 Cuyahoga County Board of Health "Illicit Discharge Detection and Elimination" manual.	
Staff (departments/agencies) utilized:	Two employees are available to be utilized from the Medina County Health Department for investigations of illicit discharges.	
Enforcement mechanisms available:	Notices of Violations (NOV)	Unknown
	Administrative fines	Unknown
	Civil penalties	Unknown
	Criminal penalties	Unknown
	Abatement charges for damage	Unknown
	Other:	Unknown
<b>Applicable Documents</b>	<b>Reviewed</b>	<b>Obtained</b>
Investigation procedures	Yes	No
<b>Notes</b>		
<b><u>Illicit Discharge Reporting</u></b>		
<p>Part III.B.3.k. of the MS4 General Storm Water Permit requires that Hinckley Township report the number of illicit discharges identified, the number of illicit discharges eliminated, and provide schedules for elimination of illicit connections that have been identified but have yet to be eliminated.</p>		

<b>Public Awareness &amp; Reporting</b>	
<b>Interview Questions</b>	<b>Response</b>
Spill reporting hotline?	Yes
	Hazardous spills are reported to the Fire Department and Ohio EPA.

# MS4 AUDIT REPORT

Public Awareness & Reporting		
Interview Questions	Response	
Complaint tracking database or system?  Describe:	Yes  Hinckley Township currently maintains a MS4 tracking database that is utilized to document compliance with all six MCMs.	
Outreach materials used to educate public about illicit discharges:	<p>Medina SWCD stated that Enviroscene, recycling and proper disposal of waste, posters for hazardous waste collection days, and newspaper articles are utilized to educate the public about illicit discharges.</p> <p>Medina SWCD provided newspaper articles entitled "Common Myth: Dumping yard waste in a stream helps stabilize the banks," "Healthy laws help keep healthy environment," "Keep the environment clean by picking up after your pets," "Protecting our water from hazardous wastes," "Using a grain of sense for road salt storage, application," "Keep streets, ditches, and streams free of grass clippings," and "Controlling pet waste contributes to a healthier environment."</p>	
Subwatersheds or neighborhoods prioritized for outreach based on complaints or land use?	<p>Yes</p> <p>Medina SWCD stated that subwatersheds or neighborhoods are prioritized on events such as Earth Day.</p>	
Applicable Documents	Reviewed	Obtained
Examples of outreach materials	Yes	Yes
Print out of complaint database or tracking system files	Not Available	Not Available

Notes
<p><b><u>Implementation and Enforcement (BMP 32)</u></b></p> <p>The SWMP establishes that Hinckley Township will annually "advertise and/or participate in the current collection days offered two times a year by CPF" for the collection and disposal of household hazardous wastes and residential yard wastes. Hinckley Township must submit information to Ohio EPA that documents that this MCM goal has been satisfied.</p>

Spill Prevention & Response	
Interview Questions	Response
Spill response plan or procedures adopted?  Who responds?	<p>Yes</p> <p>The Medina Emergency Management Agency, the Medina Sanitary Engineers pretreatment program, and the local fire department would respond to a spill.</p>

# MS4 AUDIT REPORT

Spill Prevention & Response		
Interview Questions	Response	
Adequate equipment and training for staff?	Yes  The Medina EMA, the Medina SE pretreatment program, and the local fire department would have received adequate equipment and training.	
Tracking of spills and response?	Unknown	
Database used?	Unknown	
Applicable Documents	Reviewed	Obtained
Spill tracking system	Not Available	Not Available

Notes
<u>Spill Tracking and Response</u>  Hinckley Township must submit information to Ohio EPA that details how spills and spill responses are tracked.

Used Oil & Toxics Management		
Interview Questions	Response	
Types of waste managed:	Household Hazardous Waste	Yes
	Used oil/filters	Yes
	Batteries	Yes
	Thermometers	Yes
	White goods (e.g. refrigerators)	Yes
	E-waste (e.g. computers)	Yes
	Pharmaceuticals	No
	Paint	Yes
	Other	
	Pesticides, explosives, fluorescent bulbs, and anti-freeze are other waste types that are currently being managed.	
Describe public outreach materials used:	The public outreach materials utilized by the Medina SWCD encompass utilizing posters and newspaper articles.	
Applicable Documents	Reviewed	Obtained
Outreach materials	Yes	Yes

Notes
<u>Outreach Materials</u>  Please refer to the "Message Packaging Notes" within the "Public Education/Involvement Component Worksheet" section of this audit report for previously made comments.

Sanitary Sewer Discharges	
Interview Questions	Response
Sanitary sewer systems evaluated to determine storm	Unknown

# MS4 AUDIT REPORT

sewer cross-connections or overflow locations?		
Extent of infiltration and inflow into sanitary sewer system:	Unknown	
Sewer spill and cleanup procedures in place?	Yes	
<b>Applicable Documents</b>	<b>Reviewed</b>	<b>Obtained</b>
Sewer spill and cleanup procedures	Yes	Yes
<b>Notes</b>		
No additional comments.		

<b>Staff Education and Training</b>		
<b>Interview Questions</b>	<b>Response</b>	
Staff trained to identify illicit discharges?	Yes	
Frequency:	Medina County Health Department provides periodic illicit discharge training.	
Materials used to train staff:	PowerPoint slides of what illicit discharges and information regarding what to look for when performing investigations (i.e. color and odors) are utilized.	
<b>Applicable Documents</b>	<b>Reviewed</b>	<b>Obtained</b>
Training materials	Not Available	No
Training records	Yes	Yes

<b>Notes</b>
<p><u>Training (BMP 19)</u></p> <p>According to Hinckley Township records, an illicit discharge training session occurred on April 23, 2007 and was attended by Hinckley Township.</p>

# MS4 AUDIT REPORT

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## MS4 SWMP Evaluation Outfall Visual Field Inspection Worksheet

### Background

Permittee: **Hinckley Township**

Date: **6/2/09**

Evaluator: **Chris Moody**

Predominant Watershed Landuse: **Residential**

Outfall Location: **Between 2605 and 2595 Forest Drive**

Permittee Staff Interviewed:

**Jim Kamps, Hinckley Township Storm Water Management Plan Coordinator / Zoning Commission Chairman**

**Jeff Van Loon, Manager, Medina SWCD**

**Paul Magovac, Foreman, Hinckley Township Street Department**

**Gary Norcia, Watershed Coordinator, Medina SWCD**

**Charles Pope, Hinckley Township Zoning Inspector**

Date Outfall Last Inspected by Permittee: **N/A**

Days Since Last Rainfall **N/A**

Inches **N/A**

Photos Taken? **Yes**

# MS4 AUDIT REPORT



**Outfall Description:** Between 2605 and 2595 Forest Drive

End of Pipe Diameter (feet/inches): <b>24"</b> Open Channel? No	Outfall Submerged: <b>No</b>  If yes, in: <input type="checkbox"/> <b>Water</b> <input type="checkbox"/> Fully <input type="checkbox"/> <b>Partially</b> <input type="checkbox"/> <b>Sediment</b> <input type="checkbox"/> Fully <input type="checkbox"/> Partially	Pipe Material: <input type="checkbox"/> Concrete <input type="checkbox"/> <b>PVC</b> <input type="checkbox"/> Steel <input type="checkbox"/> Other: _____	Pipe Condition: <input type="checkbox"/> <b>Good</b> <input type="checkbox"/> Fair <input type="checkbox"/> Poor  Describe:
Shape: <input type="checkbox"/> <b>Circular</b> <input type="checkbox"/> Elliptical <input type="checkbox"/> Box <input type="checkbox"/> Other: _____			

**Visual Observations:**

Flow Present: <b>Yes</b>	Flow Color:	Debris in Pipe:	Flow Odor:
Flow Volume: <input type="checkbox"/> <b>Low</b>	<input type="checkbox"/> <b>Clear</b>	<input type="checkbox"/> <b>None</b>	<input type="checkbox"/> <b>None</b>
<input type="checkbox"/> Moderate	<input type="checkbox"/> Muddy	<input type="checkbox"/> Sediment	<input type="checkbox"/> Petroleum
<input type="checkbox"/> Heavy	<input type="checkbox"/> Milky or cloudy	<input type="checkbox"/> Trash	<input type="checkbox"/> Sewage/rotten eggs
<input type="checkbox"/> Intermittent	<input type="checkbox"/> Sheen	<input type="checkbox"/> Other: _____	<input type="checkbox"/> Other: _____
	<input type="checkbox"/> Soapy foam	_____	_____
	<input type="checkbox"/> Other: _____	_____	_____

Debris Around Outfall:	Staining and Scum Present:
<input type="checkbox"/> None	<input type="checkbox"/> None
<input type="checkbox"/> Sediment	<input type="checkbox"/> <b>Red/Orange</b>
<input type="checkbox"/> Trash	<input type="checkbox"/> White
<input type="checkbox"/> <b>Other: Leaves</b>	<input type="checkbox"/> Green algae
	<input type="checkbox"/> Oily scum

**Notes:** No additional comments.

**If flow is present, ask the following questions of the Permittee contact:**

1. Has the outfall been inspected? **No** If yes, when?

## **MS4 AUDIT REPORT**

2. Was there dry weather flow during the last inspection? **N/A** (Go to Question # 6)
3. Was there an investigation as to the source of the flow? **N/A** If yes, describe the investigation.
4. What was the outcome of the investigation?  
**N/A**
5. Does the permittee have documentation detailing the investigation and enforcement which resulted? **N/A** Describe.  
**N/A**
6. What are the permittee's next steps regarding the flow discovered during the field inspection? Ask the permittee to describe, in detail, how the flow will be investigated including specific staff members responsible, time frames for action, etc.  
  
**N/A**
7. If the source of the dry weather flow is determined, what enforcement actions will the permittee take against the person responsible?  
  
**N/A**
8. Are the actions described by the permittee contact confirmed in the Enforcement Response Plan? Yes **N/A** Describe.  
  
**N/A**

### **MS4 SWMP Evaluation Outfall Visual Field Inspection Worksheet**

#### **Background**

Permittee: **Hinckley Township**

Date: **6/2/09**

Evaluator: **Chris Moody**

Predominant Watershed Landuse: **Residential**

Outfall Location: **End of Warner Road**

Permittee Staff Interviewed:

**Jim Kamps, Hinckley Township Storm Water Management Plan Coordinator / Zoning Commission Chairman**

**Jeff Van Loon, Manager, Medina SWCD**

**Paul Magovac, Foreman, Hinckley Township Street Department**

**Gary Norcia, Watershed Coordinator, Medina SWCD**

**Charles Pope, Hinckley Township Zoning Inspector**

Date Outfall Last Inspected by Permittee: **N/A**

Days Since Last Rainfall **N/A**

Inches **N/A**

Photos Taken? **Yes**

# MS4 AUDIT REPORT



## Outfall Description: End of Warner Road

End of Pipe Diameter (feet/inches): <u>N/A</u> Open Channel? <u>Yes</u>	Outfall Submerged: <u>No</u>  If yes, in: <input type="checkbox"/> Water <input type="checkbox"/> Fully <input type="checkbox"/> <u>Partially</u> <input type="checkbox"/> Sediment <input type="checkbox"/> Fully <input type="checkbox"/> <u>Partially</u>	Pipe Material: <input type="checkbox"/> Concrete <input type="checkbox"/> PVC <input type="checkbox"/> Steel <input type="checkbox"/> <u>Other: Ditch</u>	Pipe Condition: <input type="checkbox"/> Good <input type="checkbox"/> Fair <input type="checkbox"/> Poor  Describe: _____ _____ _____
Shape: <input type="checkbox"/> Circular <input type="checkbox"/> Elliptical <input type="checkbox"/> Box <input type="checkbox"/> <u>Other: Ditch</u>			

## Visual Observations:

Flow Present: <u>Yes</u> Flow Volume: <input type="checkbox"/> <u>Low</u> <input type="checkbox"/> Moderate <input type="checkbox"/> Heavy <input type="checkbox"/> Intermittent	Flow Color: <input type="checkbox"/> <u>Clear</u> <input type="checkbox"/> Muddy <input type="checkbox"/> Milky or cloudy <input type="checkbox"/> Sheen <input type="checkbox"/> Soapy foam <input type="checkbox"/> Other: _____	Debris in Pipe: <input type="checkbox"/> None <input type="checkbox"/> Sediment <input type="checkbox"/> Trash <input type="checkbox"/> <u>Other: Leaves</u>	Flow Odor: <input type="checkbox"/> <u>None</u> <input type="checkbox"/> Petroleum <input type="checkbox"/> Sewage/rotten eggs <input type="checkbox"/> Other: _____ _____ _____
Debris Around Outfall: <input type="checkbox"/> None <input type="checkbox"/> <u>Sediment</u> <input type="checkbox"/> Trash <input type="checkbox"/> Other: _____	Staining and Scum Present: <input type="checkbox"/> <u>None</u> <input type="checkbox"/> Red/Orange <input type="checkbox"/> White <input type="checkbox"/> Green algae <input type="checkbox"/> Oily scum	Notes: _____ _____ _____	

**If flow is present, ask the following questions of the Permittee contact:**

## MS4 AUDIT REPORT

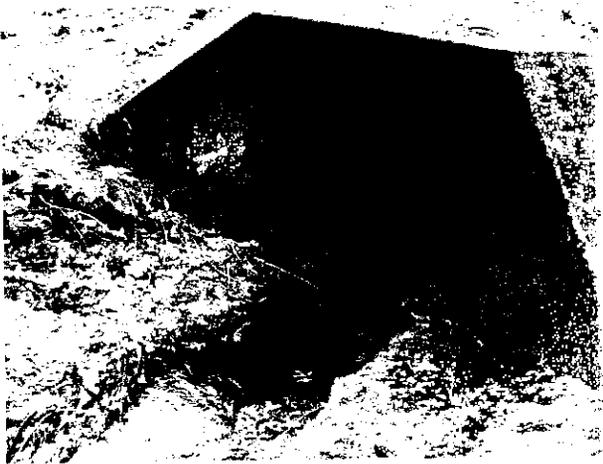
1. Has the outfall been inspected? <b>No</b> If yes, when? <b>N/A</b>
2. Was there dry weather flow during the last inspection? <b>N/A</b> (Go to Question #6)
3. Was there an investigation as to the source of the flow? <b>N/A</b> If yes, describe the investigation.
4. What was the outcome of the investigation? <b>N/A</b>
5. Does the permittee have documentation detailing the investigation and enforcement which resulted? <b>N/A</b> Describe. <b>N/A</b>
6. What are the permittee's next steps regarding the flow discovered during the field inspection? Ask the permittee to describe, in detail, how the flow will be investigated including specific staff members responsible, time frames for action, etc.  <b>N/A</b>
7. If the source of the dry weather flow is determined, what enforcement actions will the permittee take against the person responsible?  <b>N/A</b>
8. Are the actions described by the permittee contact confirmed in the Enforcement Response Plan? Yes <b>N/A</b> Describe.  <b>N/A</b>

### MS4 SWMP Evaluation Outfall Visual Field Inspection Worksheet

<b>Background</b>		
Permittee: <b>Hinckley Township</b>	Date: <b>6/2/09</b>	
Evaluator: <b>Chris Moody</b>	Predominant Watershed Landuse: <b>Residential</b>	
Outfall Location: <b>Plymouth Oval</b>		
Permittee Staff Interviewed:		
<b>Jim Kamps, Hinckley Township Storm Water Management Plan Coordinator / Zoning Commission Chairman</b>		
<b>Jeff Van Loon, Manager, Medina SWCD</b>		
<b>Paul Magovac, Foreman, Hinckley Township Street Department</b>		
<b>Gary Norcia, Watershed Coordinator, Medina SWCD</b>		
<b>Charles Pope, Hinckley Township Zoning Inspector</b>		
Date Outfall Last Inspected by Permittee: <b>N/A</b>	Days Since Last Rainfall <b>N/A</b>	Inches <b>N/A</b>

# MS4 AUDIT REPORT

Photos Taken? **Yes**



**Outfall Description:** Undocumented MS4 outfall at the location of 550 Substation Road.

End of Pipe Diameter (feet/inches): <b>36"</b> Open Channel? <b>No</b>	Outfall Submerged: <b>No</b>  If yes, in: <input type="checkbox"/> Water <input type="checkbox"/> Fully <input type="checkbox"/> <b>Partially</b> <input type="checkbox"/> Sediment <input type="checkbox"/> Fully <input type="checkbox"/> <b>Partially</b>	Pipe Material: <input type="checkbox"/> <b>Concrete</b> <input type="checkbox"/> PVC <input type="checkbox"/> Steel <input type="checkbox"/> Other:	Pipe Condition: <input type="checkbox"/> <b>Good</b> <input type="checkbox"/> Fair <input type="checkbox"/> Poor  Describe: _____ _____ _____
Shape: <input type="checkbox"/> <b>Circular</b> <input type="checkbox"/> Elliptical <input type="checkbox"/> Box <input type="checkbox"/> Other:			

**Visual Observations**

Flow Present: <b>Yes</b> Flow Volume: <input type="checkbox"/> Low <input type="checkbox"/> <b>Moderate</b> <input type="checkbox"/> Heavy <input type="checkbox"/> Intermittent	Flow Color: <input type="checkbox"/> <b>Clear</b> <input type="checkbox"/> Muddy <input type="checkbox"/> Milky or cloudy <input type="checkbox"/> Sheen <input type="checkbox"/> Soapy foam <input type="checkbox"/> Other:	Debris in Pipe: <input type="checkbox"/> <b>None</b> <input type="checkbox"/> Sediment <input type="checkbox"/> Trash <input type="checkbox"/> Other: _____ _____ _____	Flow Odor: <input type="checkbox"/> <b>None</b> <input type="checkbox"/> Petroleum <input type="checkbox"/> Sewage/rotten eggs <input type="checkbox"/> Other: _____ _____ _____
Debris Around Outfall: <input type="checkbox"/> <b>None</b> <input type="checkbox"/> Sediment <input type="checkbox"/> Trash <input type="checkbox"/> Other: _____	Staining and Scum Present: <input type="checkbox"/> None <input type="checkbox"/> Red/Orange <input type="checkbox"/> White <input type="checkbox"/> <b>Green algae</b> <input type="checkbox"/> Oily scum	<b>Notes:</b> _____ _____ _____	

**If flow is present, ask the following questions of the Permittee contact:**

## MS4 AUDIT REPORT

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1. Has the outfall been inspected? **No** If yes, when? **N/A**
2. Was there dry weather flow during the last inspection? **N/A** (Go to Question #6)
3. Was there an investigation as to the source of the flow? **N/A** If yes, describe the investigation.
4. What was the outcome of the investigation?  
**N/A**
5. Does the permittee have documentation detailing the investigation and enforcement which resulted? **N/A** Describe.  
**N/A**
6. What are the permittee's next steps regarding the flow discovered during the field inspection? Ask the permittee to describe, in detail, how the flow will be investigated including specific staff members responsible, time frames for action, etc.  
**N/A**
7. If the source of the dry weather flow is determined, what enforcement actions will the permittee take against the person responsible?  
**N/A**
8. Are the actions described by the permittee contact confirmed in the Enforcement Response Plan? Yes **N/A** Describe.  
**N/A**