



2GQ0000020091130

RICHLAND CITY OF ONTARIO

2GQ00000 2009/11/30 HABLITZEL, LYNETTE ONTARIO



State of Ohio Environmental Protection Agency

Northwest District Office

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Bowling Green, OH 43402-9398

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

Re: Richland County
City of Ontario
Municipal Storm Water Program
Audit Findings-MCM #6

November 30, 2009

Mr. Charles Au, Service Safety Director
City of Ontario
555 Stumbo Road
Ontario, Ohio 44862

Dear Mr. Au:

Ohio EPA has completed an audit for a portion of your municipal storm water program. Our audit covered overall program management, but primarily focused on implementation of minimum control measure (MCM) #6: Pollution Prevention and Good Housekeeping for Municipal Operations. This program is a requirement of the Ohio EPA General Storm Water National Pollutant Discharge Elimination System (NPDES) Permit for Small Municipal Separate Storm Sewers Systems (MS4s) and Ohio Administrative Code 3745-39. The City of Ontario currently has coverage under the Small MS4 permit, with a Facility Permit Number of 2GQ00000*BG.

On September 29, 2009, the Ohio EPA met with Mr. Jerrod Swinehart, City of Ontario Engineer, Paul Gleisinger, Streets/Sewer Supervisor, and Ken Burrer, Street Foreman, to determine compliance with the NPDES permit and the Storm Water Management Program (SWMP) submitted by the City in 2003. In performing this audit, Ohio EPA used the Municipal Storm Water Program Evaluation Guide developed by the United States Environmental Protection Agency.

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

Violations:

- **Failure to provide a written agreement with Richland County Regional Solid Waste Management Authority (RCRSWMA) for their implementation of recycling and collection program.**

This is a violation of Part III.C.3. of the Small MS4 NPDES Permit #OHQ000002. The permit allows you to rely on another entity to implement a control measure only if the other entity agrees to do so and there is written acceptance of this obligation, maintained as part of the SWMP.

- **Failure to provide measurable goals for each Best Management Practice (BMP).** This is a violation of Parts III.A.1.c. and e. of the Small MS4 NPDES Permit #OHQ000002. Some specific examples are listed in the attached Municipal Storm Water Program Evaluation Worksheets.
- **Failure to report progress in the annual reports on several BMPs listed in the SWMP.** This is a violation of Part IV. C. of the Small MS4 NPDES Permit #OHQ000002. For several BMPs listed in the SWMP, documentation/measurements were not provided in the annual reports to assess the program's progress and to document permit compliance. Some specific examples are listed in the attached Municipal Storm Water Program Evaluation Worksheets. Also, the City must have a method for collecting the data needed for its annual reports from outside groups.
- **Failure to provide controls for reducing or eliminating the discharge of pollutants from maintenance and storage yards.** This is a violation of Part III.B.6.d.iii.2 of the Small MS4 NPDES Permit #OHQ000002 and ORC 6111.04 and 6111.07. Catch basin cleanings and streets sweepings are solid waste and must be stored and disposed of accordingly. Broken asphalt may not be used as rip-rap or to stabilize drainageways.
- **Failure to include a specific list of municipal operations that are impacted by the City's operation and maintenance program to prevent or reduce pollutant runoff from municipal operations.** This is a violation of Part III. d.i. of the permit.
- **Failure to implement an annual training program for maintenance and field staff in order to prevent and reduce storm water pollution.** This is a violation of Parts III.B.6.b and d.ii. of the Small MS4 NPDES Permit #OHQ000002. Please be aware that the City is required to provide at least one training session each year on storm water BMPs to municipal staff whose job can affect compliance with the MS4 permit. Please review the attached Municipal Storm Water Program Evaluation Worksheets for further information on training.
- **Failure to describe in the SWMP procedures for all of the areas of Municipal Operations that are required to be addressed in your Pollution Prevention/Good Housekeeping Program.** Several areas of municipal operations were not addressed in the SWMP. These include, but were not limited to:

- **Failure to describe in the SWMP the City's catch basin and ditch cleaning and inspection schedules, catch basin cleaning and inspection procedures, and procedures for disposal of waste.** This is a violation of Parts III.B.6.d.iii.1.and 3.
- **Failure to describe in the SWMP the City's street sweeping procedures, schedules, and procedures for the disposal of waste.** This is a violation of Parts III.B.6.d.iii.1., 2., and 3.
- **Failure to identify in the SWMP the controls or practices used for reducing or eliminating discharges of pollutants from road and parking lot winterization activities.** This is a violation of Parts III.B.6.d.iii.1.and 2.
- **Failure to describe evaluation procedures and criteria for considering water quality impacts from new flood management facilities and for assessing existing facilities for retro-fit opportunities.** This is a violation of Part III.B.6.d.iii.4. of the permit.
- **Failure to describe in the SWMP the City's inspection schedules, procedures, and controls for reducing or eliminating the discharge of pollutants from municipal parking lots, maintenance and storage yards, fleet or maintenance shops, and deicing material storage locations.** This is a violation of Parts III.B. 6.d.iii.1., 2., and 3. of the permit.

The description of your storm water program must specifically address the following areas: 1) Maintenance activities, maintenance schedules, and long term inspection procedures for controls to reduce floatables and other pollutants to your MS4; 2) Controls for reducing or eliminating the discharge of pollutants from streets, roads, highways, municipal parking lots, maintenance and storage yards, fleet or maintenance shops with outdoor storage areas, salt/sand/winterization storage locations/application rates/BMPs, and snow disposal areas the entity operates; 3) Procedures for the proper disposal of waste; 4) Procedures to ensure that new flood management projects are assessed for impacts on water quality and existing projects are assessed for incorporation of additional water quality protection devices or practices. In addition, inspections must be documented. Also, the City should provide storm water pollution prevention guidance materials to field staff that they can take with them in the field.

- **Failure to describe in the SWMP how the City will ensure long-term maintenance of post-construction BMPs.** This is a violation of Part III.B.5.e.vi. of the permit. Every storm water pollution prevention plan (SWP3) that the City reviews and approves must include a long-term maintenance plan for post-construction BMPs.

Plans should stipulate the frequency of inspection and the schedule for routine and non-routine maintenance tasks. Additionally, the City should develop or adopt standardized maintenance checklists to be included in the plans and used by owners with private facilities.

- **Failure to describe spill response procedures in the SWMP.** The SPCC was not located during the audit. Spill response procedures are an integral part of the City's Illicit Discharge Detection and Elimination Minimum Control Measure. The SWMP needs to include this information or refer to a readily available document that contains this information as part of their plan to eliminate non-storm water discharges. This is a violation of Part III.B.3.i.iv. of the permit.
- **Failure to describe in SWMP procedures for construction and post construction storm water management (for water quality purposes) plan review.**

Deficiencies:

- As program changes are made, it is important that these changes be included in the actual SWMP. There should be one comprehensive document to which staff can refer, as opposed to the original SWMP and then updates/changes scattered through various annual reports. It is recommended that the SWMP be kept in a three ring binder, with separate (and dated) pages for each BMP to facilitate the permittee's ability to update individual sections of the SWMP. Outdated sections that have been replaced may be kept in an appendix.
- The SWMP should more clearly lay out a strategy linking known water quality problems, to the listed pollutants of concern, to sources/behaviors, to specific BMPs and measurable goals. A more clearly delineated strategy can be used to decide program implementation priorities for resource allocation.
- Please be sure that the MS4 map includes all outfalls (piped and open), as well as just those HSTS that discharge to the MS4 (as opposed to those areas that are not served by sanitary sewer).
- Catch basin cleaning is reactive and appears to be based more on maintaining structures and drainage than pollutant removal. The program could be improved by establishing a schedule for catch basin cleaning and prioritizing based on tracking the location and amounts/type of material removed.
- The SWMP should describe how vegetation is maintained in grassed swales, rain gardens, pond perimeters, and other vegetated storm water controls in order to promote treatment of runoff, as well as for aesthetics.
- The street sweeping program could be improved by targeting areas of water quality concern where pollution generation is the highest or water quality is most sensitive, e.g., heavily traveled streets, commercial or industrial areas. Sweeping of municipal parking lots/areas is recommended.

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- The City has not developed an efficient way to track the amount of salt used. More detailed tracking may allow the city to better identify inefficiencies in salt application. The city will need to quantify the amount and the materials used for deicing activities under NPDES Permit #OHQ000002 beginning with the 2009-2010 winter season.
- A Storm Water Pollution Prevention Plan (SWP3) must be developed for yard waste collection areas, maintenance yards, and vehicle maintenance facilities within 2 years, i.e., by May 26, 2011. Please be aware that an inspection must be conducted at least once per year during the next permit cycle once a SWP3 is developed for these facilities. Ohio EPA recommends you develop a checklist for facility inspection to provide consistency. Please reference Ohio EPA General Storm Water NPDES Permit for Industrial Activities #OHR000004 for more information on the contents of a SWP3.
- The City needs to assure contract language/agreements specify that storm water BMPs must be implemented by a third party when that third party is hired to conduct a municipal operation and is relied upon to enact BMPs. Please be sure to add this language to any future requests for proposal or contracts you sign with third party service providers whose activities could generate storm water pollution.
- The Spill Prevention Control and Countermeasure (SPCC) plan was not located during the audit. Spill response procedures are an integral part of the City's Illicit Discharge Detection and Elimination Minimum Control Measure. The SWMP needs to include this information or refer to a readily available document that contains this information.
- Some material in the spill kit near the fueling station appeared to have been shredded and needed to be replaced.
- There have been several instances when the annual report has only been submitted to Ohio EPA's Central Office. Please be aware that the permit requires that a copy to be sent to both Central Office in Columbus and the North West District Office in Bowling Green.

Please review my comments and provide me with a letter of response indicating the actions you will take to address my concerns. **Your response should be received no later than 60 days after the date on this letter.** Please note that this response does not replace the requirement to submit an Annual Report. Your annual report for the calendar year of 2009 will be due on April 1, 2010.

As a reminder, the Small MS4 NPDES General Permit was renewed in January 2009. The current permit includes performance standards to set minimum permit expectations for program implementation. It will be necessary to revise your SWMP to meet these permit requirements.

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The current permit also specifies that MS4s include certain information in the annual reports and use the Ohio EPA's Annual Report Form. Both the current Small MS4 Permit and the Annual Report form may be found at:
http://epa.ohio.gov/dsw/permits/GP_MS4StormWater.aspx.

If you have any questions, please contact me at (419) 373-3009.

Sincerely,



Lynette Hablitzel, P.E.
Storm Water Program
Division of Surface Water

//lr

Enclosure: Municipal Storm Water Program Evaluation and Field Inspection
Worksheets

pc: Jerrod Swinehart, City of Ontario,
Jason Fyffe, DSW-CO
~~OSW-NWDO File~~

ec: Walter Ariss, DSW-NWDO

MUNICIPAL STORM WATER PROGRAM EVALUATION

Program Management Component Worksheet

Date of Evaluation September 29, 2009
Evaluator Name, Title Lynette Hablitzel, ES2
MS4 Permittee & Facility Permit No. City of Ontario 2G000000*BG

Staff Interviewed		
Name	Department/Agency	Phone Number/Email
Jerrold Swinehart, PE	City of Ontario Engineer	419-529-6402 jswinehart@ontarioohio.org
Paul Gleisinger	Street/Sewer Supervisor	419-529-6341 pgleisinger@ontarioohio.org
Ken Burrer	Street Foreman	419-529-3818 kburrer@ontarioohio.org

Comprehensive Storm water Management Planning SWMP Planning	
Interview Questions	Response
SWMP Plan developed? Dated:	Yes. SWMP has not changed since the original submittal in 2003. Updates to SWMP are in annual reports: not included in one document. See Notes below.
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 storm water elements? If so, what types? <ul style="list-style-type: none"> • Imperviousness • Open space • Water body protection 	City has zoning. In street, right of way, and subdivision regulations there are limits on percent imperviousness and a requirement for open spaces.
Were stakeholders included in the planning process?	The public notice and hearing process required by law was followed.
Applicable Documents	Reviewed Obtained
SWMP Plan	Ohio EPA copy on file. Ohio EPA copy on file.

Comprehensive Storm water Management Planning Intergovernmental, Agency, Departmental Coordination	
Interview Questions	Response

MUNICIPAL STORM WATER PROGRAM EVALUATION

Are roles and responsibilities for multiple co-permittees established?	N/A	
If multiple co-permittees, is there an "umbrella group" to coordinate activities?	N/A	
Are there MOUs between permittee and outside agencies?	Yes. Letter of commitment included in 2004 Annual Report for student educational program at Stingel Elementary.	
How are in-house departments coordinated?	Generally through the City Engineer's verbal and written communication to the different departments.	
Is there a storm water task force or committee in place?	No	
Are outside groups used to implement the SWMP?	Yes. The City has had changes in the City Engineer position over the years. K.E. McCartney was sometimes listed as the implementing entity in the annual reports, as they sat in place of the City Engineer during these vacancies. Recycling and Hazardous Waste collection program implemented by Richland County Regional Solid Waste Management Authority. See Notes below.	
Applicable Documents	Reviewed	Obtained
MOUs or other agreements	No.	No.
Meeting schedules for in-house or inter-agency task forces or committees	None exist.	None exist.

Comprehensive Storm water Management Planning Staff Inventory & Organization		
Interview Question	Response	
Has an organizational chart been developed?	No, but the City does list the contact person and information for each BMP in the annual reports. See Notes below.	
Have roles and responsibilities been assigned?	Yes.	
Applicable Documents	Reviewed	Obtained
Storm water program staff lists, responsible parties, contact names, organizational charts	Annual Reports on file at Ohio EPA.	Annual Reports on file at Ohio EPA.

Notes

MUNICIPAL STORM WATER PROGRAM EVALUATION

Comprehensive SWMP - As program changes are made, it is important that these changes be included in the actual SWMP. For example under the Public Education Minimum Control Measure, the SWMP states that the City will develop and implement procedures to notify the public of upcoming meeting and educational opportunities by February 2004. Ongoing annually. The 2008 Annual Report says this was accomplished but provides no further details. There should be one comprehensive document to which staff can refer, as opposed to the original SWMP and then updates/changes scattered through various annual reports. To aid in this, it is suggested that the SWMP be kept in a three ring binder, with each BMP on a separate page(s). As changes are made to a BMP, these sections can then be easily replaced, with the previous version placed in an appendix. Please note that whenever the SWMP is updated, it must be signed in accordance with Part V.G. of the permit.

Written Agreements - The City must provide MOUs for Richland County Regional Solid Waste Management Authority (RCRSWMA). The MOU should stipulate a timeframe for notifying the City should RCRSWMA decide not to implement the recycling program and hazardous waste collection program. Please keep in mind that the City is obligated to implement the Best Management Practice in the event RCRSWMA does not.

Table of Organization - The Small MS4 NPDES General Permit was renewed in January 2009. It requires that the SWMP include a Table of Organization, including a primary point of contact, which identifies how implementation across multiple positions, agencies and departments will occur. This must be submitted with the annual report that is due April 1, 2010.

Comprehensive Storm water Management Planning Performance Standards or Goals		
Interview Questions	Response	
Have measurable goals or standards been developed for each SWMP program component?	Not for each. See Notes below.	
Do the goals address water quality impact or effectiveness? How?	Some do. See Notes below.	
Applicable Documents	Reviewed	Obtained
Performance standards, measurable goals, schedule	Yes	Copies of SWMP and Annual Reports on file at Ohio EPA

Comprehensive Storm water Management Planning Prioritization of Resources	
Interview Questions	Response
Have pollutants of concern (POC) been established? If yes, based on what? <ul style="list-style-type: none"> • 303(d) list? • TMDLs? • Predominant land uses? • Existing watershed planning efforts? 	Yes, for the Public Education Minimum Control Measure. Target pollutants were listed as restaurant grease, road oil, construction debris, and septic system illicit discharge. SWMP stated that educational efforts would also target chemicals, pesticide/herbicide use, and other household waste. See Notes below. Basis: Currently there are no final TMDLs. The City reviewed the 303(d) list.

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Have POC-specific strategies been developed in the SWMP?	There appear to be BMPs that address the listed POCs, but the strategy is not clearly described. See Notes below.
How does the permittee decide program implementation priorities for resource allocation?	City not asked.

Assessment and Evaluation	
Interview Questions	Response
Is the SWMP regularly measured against goals or standards?	Yes. However, for several BMPs measurements were not provided in the annual reports to demonstrate progress. See Notes below.
Have load reduction goals been established or assessed?	Some load reduction goals established (percent increase in the amount of material recycled, a reduction in pesticide/herbicide use), but not assessed.
Have other types of improvements been assessed? <ul style="list-style-type: none"> • Riparian habitat? • Stream corridor? • Aquatic habitat? • Groundwater 	Yes. The Post Construction MCM is to measure success by compliance with the SWP3 (which was not documented in the annual reports) and an increase in green space, detention/retention facilities, and riparian buffer zones, and increase in other Water Quality practices, and documented improvement in water quality. While the 2008 Annual report says this was done, no documentation has been provided that shows improvement in WQ: in-stream sampling before and after, modeling pollutant removal, etc.

Notes
<p>Measurable Goals - The permit requires that the Storm Water Management Program include a measurable goal for each Best Management Practice. Some of the listed measurable goals (completion dates) are documentation of completing a task, not measurements to evaluate effectiveness. In some cases, especially when initially creating a program, these types of goals may be appropriate interim milestones. <u>The City needs to provide quantitative goals, describe how and why measurable goals were selected for each BMP, and look for ways to assess BMP effectiveness. Goals are to be linked to how the City will evaluate the success of the program.</u> For example, under the Construction Program, the SWMP states that success will be measured by the number of inspections, enforcement actions, and the level of compliance. <u>While these are program elements that can be measured, quantifiable targets were only given for the percent of conducted inspections.</u> Another example would be under the Post Construction Storm Water Management Program. The SWMP states that success will be measured by compliance with the SWP3; increases in green space, detention and retention facilities, riparian buffer zones, and other WO practices; and documented improvement in water quality. <u>Again, while these are program elements that can be measured, quantifiable targets were not given for SWP3 compliance.</u></p> <p><u>Please review the SWMP to insure there are measurable goals and revise accordingly. Keep in mind that final measurable goals should demonstrate results that relate to an environmental benefit. They are BMP</u></p>

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design objectives or goals that quantify the progress of program implementation and the performance of BMPs. Examples of results that relate to an environmental benefit include the number and types of illicit connections identified and corrected; survey results showing a percent increase in public awareness of storm water issues; the volume or weight of materials collected at recycling facilities; the mass or volume of solids removed during street sweeping and catch basin cleaning operations, or measured improvements in water quality

Assessment and Evaluation - For several BMPs, documentation/measurements were not provided in the annual reports to assess the program's progress and to demonstrate permit compliance. Examples include, but are not limited to: 1) Measurements of the level of SWP3 compliance and improvements in water quality were not documented in the Annual Reports for the Post Construction MCM. While the 2008 Annual Report says these BMPs have been done, no documentation has been provided that shows an improvement in WQ or that it has been evaluated, such as before and after stream sampling, modeling pollutant removal, etc. 2) Under the Public Education and Participation MCM, the SWMP states the City will document the number of residents and businesses attending seminars and forums. Measurable goals were to educate 25% of residents and businesses by February 2006, 50% by 2006, and 75% by December 2007. To demonstrate compliance, the Annual Reports would need to provide the number of total residents and of businesses, as well as the number of each reached. The Annual Reports did not provide information for this BMP. 3) The SWMP stated the City would establish a recycling and hazardous waste collection program. The amount of waste material collected would be documented. Measurable goals were a 20% increase in recycling by February 2005, a 30% increase by February 2006. While the 2008 Annual Report listed events and dates, no amounts were provided to demonstrate progress in meeting these goals.

Prioritization based on Pollutants of Concern – The SWMP should more clearly lay out a strategy linking known water quality problems, to the listed pollutants of concern, to sources/behaviors, to specific BMPS and to measurable goals.

Data Collection and Reporting		
Interview Questions	Response	
Are reporting requirements in the MS4 permit for the following: <ul style="list-style-type: none"> • Co-permittees? • An umbrella organization/group? 	N/A	
How are data or information from outside groups obtained?	The City stated does not use outside groups to meet permit requirements (except to attend outside training). See Notes below.	
Have internal reporting deadlines been established?	No, Jerrod Swinehart is responsible for annual reports. He contacts departments to obtain information.	
Applicable Documents	Reviewed	Obtained
Reporting or assessment procedures	None in writing.	None in writing.

Notes

Data Collection – During the interview it was reported that outside groups are not used, however, the annual reports indicate that RCRSWMA is used for implementing the recycling and hazardous waste collection BMP. The annual reports do not include quantities are material collected, which was committed to in the SWMP. The City must have a method for collecting data from outside groups.

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MS4 Maintenance Component Worksheet

Date of Evaluation September 29, 2009
Evaluator Name, Title Lynette Hablitzel, ES2
MS4 Permittee & Facility Permit No. City of Ontario 2G000000*BG

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
Jerrold Swinehart, PE	City of Ontario Engineer	419-529-6402 jswinehart@ontarioohio.org
Paul Gleisinger	Street/Sewer Supervisor	419-529-6341 pgleisinger@ontarioohio.org
Ken Burrer	Street Foreman	419-529-3818 kburrer@ontarioohio.org

Interview Questions	MS4 Mapping		
	Response		
Outfalls and receiving waters mapped?	Receiving waters -Yes. Outfalls- See Notes below.		
Catch basins?	Yes		
Pipes, ditches, other conduits?	Mostly		
Home Sewage Treatment Systems (HSTS)	A few not mapped but listed in the AR		
Flood Control Facilities	Detention ponds- yes. City has no pumps.		
Public storm water facilities (BMPs)?	Public and private ponds, underground vaults,		
Private storm water facilities (BMPs)?	and hydrodynamic separators		
How are maps used (i.e. tracking illicit discharges)?	City not asked.		
Applicable Documents		Reviewed	Obtained
Map(s) of MS4 system		Yes	No

Notes

MS4 Mapping - A map with receiving streams, outfall pipes, and outfall pipes from detention/retention facilities was included in SWMP. Based on the labeling, it was unclear if the map onsite included all outfalls or just enclosed ones. Please be sure show all municipal separate storm sewer system outfalls to waters of the state on the map. This includes those from: swales, ditches, catch basins, storm sewers, etc. Their mapping is important – not only to have an awareness of the location of the MS4 system, but also because they all must be observed as part of the City's dry weather screening program.

The Small MS4 NPDES General Permit was renewed in January 2009. It requires that all catch basins and publicly-owned storm sewers, ditches and storm water management facilities be mapped. In addition,

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Notes

map must show privately-owned storm water management facilities constructed as post-construction BMPs for new development or redevelopment which has occurred since April 21, 2003. This must be completed by 2014.

HSTS – A list (street name and address, along with named receiving water) was generated based on anyone not connected to sanitary sewer. The City needs to map only those discharging to the MS4.

Catch Basin Cleaning		
Interview Question	Response	
Schedule established for inspections and cleaning?	No. Clean as needed. The City doesn't have many catch basins with sumps.	
Is cleaning and maintenance of catch basin tracked:	It is documented but not necessarily tracked (i.e. looking for trends to direct resources to address pollution). Hard copy of work orders are created, listing general street intersection, milemarker, or address as the location. See Notes below.	
How are spoils materials disposed of?	Spoils from storm sewer or ditch are placed in stockpile(s) at municipal yard. Then this material is used as fill. See Notes below.	
Are storm drain pipes inspected? Proactive or only in response to blockage event?	No. Activity is on an as needed basis.	
Applicable Documents	Reviewed	Obtained
Tracking logs	Work Orders not reviewed.	No.
BMP guidance	None exist.	None exist.

Notes

Catch Basin Cleaning - City does have a vacuum truck. During leaf pick-ups and snow plowing, employees note problems. Inspections consist of looking for physical damage (sink holes, street damage). These visual observations and complaints generate maintenance/repair work orders. The activity conducted appears to be more about maintaining drainage than performing maintenance to address the amount of pollutants discharged. BMPs were to be chosen to reduce the discharge of pollutants. This program could be improved by establishing a schedule for catch basin cleaning and prioritizing based on tracking the location and amounts/type of material removed. Catch basin cleaning and inspection schedules, catch basin cleaning and inspection procedures, and procedures for disposal of waste **must** be described in the SWMP, including information on material storage methods, testing protocols, and disposal locations. This is a violation of Parts III.B.6.d.iii. and 3.

Catch basin cleanings are a solid waste. They should be stored in a lidded dumpster and must be disposed at a landfill.

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Ditch Maintenance- City performs mowing and cleaning of ditches. Store dredged material in Maintenance Yard and use as fill. Ditch cleaning and inspection schedules, cleaning and inspection procedures, and procedures for disposal of waste must be described in the SWMP, including information on material storage methods, testing protocols, and disposal locations.

Storm water Management Facilities Operation and Maintenance		
Interview Questions	Response	
Public facilities inspected? Frequency:	Yes. Twice per year. Once during dry weather and once during typical rain event.	
Private facilities inspected? Frequency:	Yes.	
Checklist used for inspections?	Yes. Checklist documents outfall condition as (O/D/N), which means: oil sheen, discoloration, or normal. "No maintenance" means it is a private facility in need of maintenance.	
Maintenance standards and procedures established?	Routine mowing; typically clean inverts once per year on public facilities, except for this year due to labor shortage. The SWMP should describe how vegetation is maintained in grassed swales, rain gardens, pond perimeters, and other vegetated storm water controls in order to promote treatment of runoff, as well as for aesthetics.	
Data evaluated to target maintenance resources?	Tree removal if fallen	
Applicable Documents		
Inspection checklist	Reviewed	Obtained
	Yes.	Yes.

Notes

Storm water Management Facilities Operation and Maintenance - Streets Department (Ken Burrer usually) does inspections. They also do work orders on the public facilities. The work list goes to Jerrod Swinehart, City Engineer, for private facilities. He will send a letter requesting the owner to fix the problem. A second letter may be sent with a 30 day deadline. If private entity does not take action, the case is given to the prosecutor. The SWMP does not describe how the City will ensure long-term maintenance of post-construction BMPs. This is a violation of Part III.B.5.e.vii of the permit. The SWMP also needs to include an official enforcement escalation plan or procedure. Such a policy should clearly describe the action to be taken for common violations, define the roles of various departments and describe which staff are authorized to enforce the applicable ordinances. The SWMP should describe how enforcement actions are tracked.

The Small MS4 NPDES General Permit was renewed in January 2009. It includes performance standards to set minimum permit expectations for program implementation. Pre-construction site plan review of 100 percent of projects from construction activities that result in a land disturbance of greater than or equal to one acre to ensure that required post construction controls are designed per requirements is a permit

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condition. Ensuring that long-term operation and maintenance (O&M) plans are developed and that agreements are in place for all applicable sites is also a requirement. You have until May 26, 2011 to revise your SWMP to satisfy this performance standard? Plans should stipulate the frequency of inspection and the schedule for routine and non-routine maintenance tasks. Additionally, the City should develop or adopt standardized maintenance checklists to be included in the plans and used by owners with private facilities. The Center for Watershed Protection has a manual on long-term maintenance programs with checklists that you may want to use for your program. Chagrin River Watershed Partners, Inc. (CRWP) has developed a model agreement that a municipality may use to ensure the long-term operation and maintenance of post-construction best management practices (BMPs). This language may need to be modified to reflect local requirements and should be reviewed by the municipality's legal council. A copy may be found at: http://crwp.org/pdf_files/model_im_agree_sw_bmp_10_29_2008.pdf.

The Small MS4 NPDES General Permit requires the City to include in its annual report: (1) number of applicable sites in your jurisdiction requiring post-construction controls; (2) number of pre-construction storm water pollution prevention plan reviews performed; (3) number of inspections performed to ensure as built per requirements, and (4) number of long-term operation and maintenance (O&M) plans developed and agreements in place.

Road Maintenance			
Interview Questions		Response	
Streets regularly swept? Frequency:		Curbed streets swept once per year. Service is contracted out. Sweeper is brush with center vacuum. The equipment only uses water on the second pass for dust control. City is charged by the hour. City supplies a truck to bring sweepings back to the municipal yard.	
Frequency based on water quality factors (e.g. proximity to streams)?		Done in the spring.	
How are spoils disposed of?		Brought back to the municipal yard, stockpiled, and used as fill.	
BMPs used during road maintenance activities?		None in writing.	
Deicers used by MS4?		Yes.	
Type and amount of deicer tracked?		Rock salt. No brine. Tracking done on an annual basis. The city has a bill and they know approximately how much remains unused. On the state routes – some work is contracted out to the state.	
Sand/salt swept up after application?		Only in loading/unloading area. Not streets or parking lots.	
Applicable Documents:		Reviewed	Obtained
BMP guidance		None exist.	None exist.
Street sweeping records		No.	No.

Notes

MUNICIPAL STORM WATER PROGRAM EVALUATION

Notes

Street Sweeping- The sweeping program could be improved by targeting areas of water quality concern where pollution generation is the highest or water quality is most sensitive, e.g., heavily traveled streets, commercial or industrial areas. In addition, more frequent sweeping along with electronic documentation could improve your program. You will need to adequately track the total amount of material that you have swept for each subsequent annual report. Street sweeping procedures and schedules and procedures for disposal of waste must be described in the SWMP, including information on material storage methods, testing protocols, and disposal locations. This is a violation of Parts III.B.6.d.iii.1, 2., and 3. The current practice of managing street sweepings is unacceptable. Street sweepings are solid waste and must be managed as such!

Road Deicing- Although the City has an idea of how much deicing material is used through purchase orders, more detailed tracking of salt applications may allow you to identify inefficiencies in the system that lead to over-application. Tracking the amount of salt used per storm event and truck route is suggested. Other than mentioning dispensing equipment calibration, the SWMP does not currently identify controls or practices used for reducing or eliminating discharges of pollutants from road and parking lot winterization activities. This is a violation of Parts III.B.6.d.iii.1 and 2. The SWMP should describe controls such as calibration frequency and snow disposal procedures. The city will need to quantify the amount and type of deicer used for NPDES Permit #OHQ00000, beginning with the 2009-2010 winter season!

Flood Management

Interview Questions	Response	
Inventory of flood management structures completed?	No.	
Structures been assessed for storm water retrofit?	No.	
New structures include water quality considerations?	Yes.	
Applicable Documents	Reviewed	Obtained
Inventory	No list.	

Notes

Flood Management Projects - Some of the newer basins are designed for water quality, but older structures were designed for water quantity. All new flood management structures are designed for water quality. The SWMP does not currently describe evaluation procedures and criteria for assessing the water quality impacts of new flood management facilities or for assessing existing facilities for incorporation of water quality devices or practices. This opportunity most often arises when basins are rebuilt or repaired. This is a violation of Part III.B.6.d.iii.4 of the permit.

Facilities Operation & Maintenance

Interview Questions	Response
Inventory of MS4 facilities complete (i.e. facilities owned and operated by the MS4)?	No. The SWMP must include a list of the municipal operations that are impacted by the operation and maintenance program. This is a violation of Part III. d.i. of the permit.
Types of facilities included <i>These need their own NPDES storm water permit for industrial activities, if there is a discharge of runoff from these operations:</i>	<u>Response</u> <u>SWP3 Developed?</u>

MUNICIPAL STORM WATER PROGRAM EVALUATION

Facilities: Operation & Maintenance											
Interview Questions	Response										
<ul style="list-style-type: none"> • Landfills Type: <u> N/A </u> • Solid Waste Transfer Stations • Airports • Shipping Ports • Steam Electric Power Plants • Wastewater Treatment Plants \geq 1 MGD <p><i>These do not need their own NPDES permit, but do need SWP3, if community operates:</i></p> <ul style="list-style-type: none"> • Impound Lots • Composting Operations <ul style="list-style-type: none"> ✓ No discharge of leachate permitted • Leaf Collection Yards <ul style="list-style-type: none"> ✓ No discharge of leachate permitted • Maintenance Yards <ul style="list-style-type: none"> ➢ How many do they operate? <u> 1 </u> ➢ List facility names/locations: Municipal buildings and facilities located at: 3375 Milligan Road Ontario, OH • Bus Terminals • Vehicle Maintenance Garages <ul style="list-style-type: none"> ➢ How many do they operate? <u> 1 </u> ➢ List facility name/locations: Same as above <p><i>These are municipal operations for which the MS4 must adopt best management practices, but do not require a formal SWP3:</i></p> <ul style="list-style-type: none"> • Parks and Open Space (include Cemeteries) <ul style="list-style-type: none"> ➢ How many in UA? <u> 6 </u> ➢ List facility names/locations: 	<p>None. N/A since do not operate.</p> <p>None. Garbage and recycling services contracted. N/A since do not operate</p> <p>None. Satellite community to City of Mansfield. N/A since do not operate</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border-bottom: 1px solid black; text-align: center;"><u>Response</u></td> <td style="width: 50%; border-bottom: 1px solid black; text-align: center;"><u>SWP3 Developed?</u></td> </tr> <tr> <td>None.</td> <td>N/A since do not operate</td> </tr> <tr> <td>None.</td> <td>N/A since do not operate</td> </tr> </table> <p>City does leaf collection and hauls directly to county. City collects branches in the spring and brings to yard on Milligan, where they contract to have it ground into mulch. No SWP3 – see Notes below.</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border: none;">Yes.</td> <td style="width: 50%; border: none;">No SWP3 – see Notes below.</td> </tr> </table> <p>None. N/A since do not operate</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border: none;">Yes.</td> <td style="width: 50%; border: none;">No SWP3 – see Notes below.</td> </tr> </table> <p style="text-align: center;"><u>Response</u></p> <p>Ontario Community Church Cemetery Off Park Avenue West</p> <p>Land on Park Avenue West – no name yet. Park not yet developed.</p> <p>Marshall Park 3375 Milligan Road</p> <p>Stowell Park on Ferguson</p>	<u>Response</u>	<u>SWP3 Developed?</u>	None.	N/A since do not operate	None.	N/A since do not operate	Yes.	No SWP3 – see Notes below.	Yes.	No SWP3 – see Notes below.
<u>Response</u>	<u>SWP3 Developed?</u>										
None.	N/A since do not operate										
None.	N/A since do not operate										
Yes.	No SWP3 – see Notes below.										
Yes.	No SWP3 – see Notes below.										

MUNICIPAL STORM WATER PROGRAM EVALUATION

Facilities Operation & Maintenance		
Interview Questions	Response	
<ul style="list-style-type: none"> • Public Parking Lots (other than municipal buildings, parks, etc.) <ul style="list-style-type: none"> ➢ How many do they operate? <u>None</u> ➢ List facility name/locations: 	<p style="text-align: center;">Sunset Park</p> <p style="text-align: center;">Spring Village on Spring Village</p>	
Facilities inspected? Frequency:	Yes, although not necessarily for storm water. Parks: restrooms, trash, and playground equipment are inspected daily. Parks are inspected monthly for fence/safety issues.	
Checklist used?	No. For facilities that require a formal SWP3, an inspection checklist, customized to that facility, must be included in the plan. For other facilities, we recommend the City develop an inspection checklist. Inspections must be documented.	
Is there a designated storm water contact person for each facility?	Yes. Paul Gleisinger does maintenance yard, parks, cemetery.	
Describe enforcement procedures used to address noncompliance on a MS4-owner facility:	Civil Service Rules: state statute. Employee discipline options range from verbal warning to written, with the possibility for time off from work and termination of employment. This system has not been carried out for any issue concerning storm water or other environmental compliance issue.	
Parking lots owned/operated by the permittee swept?	No. It is considered a BMP to sweep the City's parking lots and the practice is recommended. As with street sweeping, we recommend it occur in the spring to collect pollutants that have accumulated in snowbanks over winter and in fall after leaves have fallen.	
Sanitary sewer systems at municipal facilities evaluated to determine storm sewer cross-connections or overflow locations? How (video camera, dye test, etc.)?	Yes. Video camera, smoke tested, and dye tested back in 2006/2007.	
Spill response and cleanup procedures in place?	Reported as "yes". Have two staff with spill training. Staff could not locate SPCC during audit – see Notes below.	
Applicable Documents	Reviewed	Obtained
Facility inventory	None exists.	None exists.
Facility SWP3	None exists.	None exists.

MUNICIPAL STORM WATER PROGRAM EVALUATION

Notes

SWP3 - The Ohio EPA General Storm Water NPDES Permit for Small MS4s #OHQ000002 requires the City to develop a SWP3 for the following operations: yard waste, maintenance yard, and vehicle maintenance garages. The SWP3s must be developed and implemented within 2 years of permit renewal. The above facilities must be inspected at least once per year and a record of the inspection and its findings must be kept with the SWP3. If this annual inspection reveals deficiencies in the SWP3 or BMPs that are ineffective, the SWP3 must be revised to correct the problems. The SWP3 should contain a checklist to provide consistency to facility inspections. The SWP3 should also identify who is responsible for facility inspections as well as a storm water contact person for the facility. Please reference Ohio EPA General Storm Water NPDES Permit for Industrial Activities #OHR000004.

Municipal Facilities Operation and Maintenance - The SWMP does not describe the City's inspection procedures, schedules, and controls for reducing or eliminating the discharge of pollutants from municipal parking lots, maintenance and storage yards, fleet or maintenance shops, debris material storage locations. This is a violation of Part III.B. 6.d.iii.1., 2., and 3.

Facility inspections must be documented. It is recommended that the inspection forms for the parks be revised to include storm water issues.

Spill Response- One diesel and one gas tank are located at maintenance facility (3000 gal ea.). They consist of dual wall tanks with a shut off switch located on salt storage building. Fueling area is under canopy. Secondary containment berms were around the fuel pumps. Spill response material was stored next to pumps under the canopy. Used oil and antifreeze are stored inside, as are other liquid materials. Spills – use dry product to absorb and placed into dumpster. Dry material storage consists mostly of salt, which is stored in a building.

Spill response procedures are an integral part of the City's Illicit Discharge Detection and Elimination Minimum Control Measure. The SWMP needs to include this information or refer to a readily available document that contains this information as part of the plan to eliminate non-storm water discharges. This is a violation of Part III.B.3.i.iv. of the permit.

Pesticides, Herbicides & Fertilizers	
Interview Questions	Response
Certified applicators used?	Yes. Ken Burre and Bill Flanagan are certified.
Integrated Pest Management (IPM) practices used?	According to 2008 Annual Report, the City is developing one.
Storage location of pesticides, herbicides, and fertilizers:	No fertilizers stored onsite. Obtain product at the time of use for bulk application. Have storage cabinet onsite. May store 5 to 10 gallons at a time.
BMPs used during application:	Common sense practices are executed during application, such as looking at the weather before applying. Fertilizer – nothing in writing. Herbicide – used as needed.
Fertilizer/pesticide application plan utilized?	Not in writing.
Applicable Documents:	Reviewed Obtained

MUNICIPAL STORM WATER PROGRAM EVALUATION

Fertilizer/pesticide application plan	None.	
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Standards, BMPs, & Outreach		
Interview Questions	Response	
BMP technical guidance document available to maintenance staff?	Nothing in writing.	
MS4 use contractual staff to complete MS4 maintenance activities?	Yes. Some paving, structure rebuilds, electrical work, street sweeping. Large equipment repair is contracted to be done offsite.	
BMP guidance materials provided to contracted staff?	No.	
Requirement to consider storm water impacts and utilize appropriate BMPs in contracts?	Somewhat. Have to meet City of Ontario code or ODOT specifications. No standard specifications for dewatering.	
Applicable Documents		
	Reviewed	Obtained
BMP manual or guidance document	Does not exist.	Does not exist.
Contract language for MS4 operation and maintenance activities	No.	No.

Notes

Pesticides, Herbicides & Fertilizers - While the City follows several procedures to minimize pollutants from fertilizer and pesticide use, the SWMP must describe the City's controls for pesticides and fertilizer storage and use.

BMP Guidance - Currently, there is no written guide available to the municipal staff on Storm Water BMPs. The City needs to develop material that will let staff understand their contribution to storm water pollution and what methods they can use to limit the pollutants. This could include binder or flip books placed in vehicles or in a locker room for easy reference. For more ideas, please consult the *Rainwater and Land Development* manual (ODNR, 2006). We also recommend you review the *Municipal Pollution Prevention/Good Housekeeping Manual #9* (Center for Watershed Protection, September 2008). This manual is available as a free download on their website.

Contracted Services and Guidance - The SWMP shall describe how contractual staff performing operation and maintenance activities for the permittee are required to consider storm water quality and implement appropriate BMPs. It is the city's obligation to assure contract language/agreements specify that storm water BMPs must be implemented by the third party. Please be sure to add this language to any future requests for proposal or contracts you sign with third party service providers whose activities can create storm water pollution. The contractor should be held accountable to comply with the storm water requirements of the City. Periodic inspection of their operations in your community is also suggested.

Staff Education and Training	
Interview Questions	Response
Staff trained to identify illicit discharges? Frequency:	Not extensively. Usually if they spot something out of the ordinary, they contact Paul Gleisinger and he determines course of action. Supervisors and city engineer are notified.
Materials used to train staff:	Not in writing

MUNICIPAL STORM WATER PROGRAM EVALUATION

Staff Education and Training			
Interview Questions	Response		
	Applicable Documents	Reviewed	Obtained
Training materials		None.	None.

Notes

Staffing level = 1 Engineer, 5 Water, 3 Streets, 5 Sewer Department.

Staff Training and Education - The permit requires the City to develop and implement an operations and maintenance program for its MS4 that includes a training component. The SWMP must describe who (i.e. department, section) receives what type of training. An employee training matrix may be useful to document training needs as well as to track training implementation. Although storm water program managers have received training, the City did not have documentation that training has been provided to maintenance and field-level staff on storm water pollution prevention matters. Please begin documenting the training events provided and staff being trained. Failure to provide training to municipal staff on storm water pollution prevention matters is a violation of Parts III.B.6.b. and d.ii. of the permit. NPDES permit #OHQ000002 requires you to train staff on storm water pollution prevention at least once every year. Documentation must be kept, such as agendas, attendance dates and lists, and materials used. A summary of employee training program(s) implemented with number of employees that attended must be included in your next annual report.

Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) as well as ODOT's Local Technical Assistance Program (LTAP) have provided a number of training opportunities on pollution prevention and good housekeeping for municipal operations over the past several years. Materials presented at OCAPP's session are archived on the internet at: http://epa.ohio.gov/ocapp/storm_water.aspx and can be used to provide training to your staff. The Center for Watershed Protection also has information available for training in their Manual #9: Municipal Pollution Prevention/Good Housekeeping Practices.

Pollution Prevention for Municipal Operations - Overall

The SWMP is lacking in detail. The description of your storm water program must specifically address the following areas: 1) Maintenance activities, maintenance schedules, and long term inspections procedures for controls to reduce floatables and other pollutants to your MS4; 2) Controls for reducing or eliminating the discharge of pollutants from streets, roads, highways, municipal parking lots, maintenance and storage yards, fleet or maintenance shops with outdoor storage areas, salt/sand/winterization storage locations/application rates/BMPs, and snow disposal areas the entity operates, 3) Procedures for the proper disposal of waste, including dredge spoil, accumulated sediments, floatables, and other debris. ; 4) Procedures to ensure that new flood management projects are assessed for impacts on water quality and existing projects are assessed for incorporation of additional water quality protection devices or practices. Many of these activities are not described in the SWMP. Including appropriate procedures, controls, maintenance schedules and record keeping which addresses all of the areas listed under Part III.B.6.d.iii. is required.

MUNICIPAL STORM WATER PROGRAM EVALUATION

MS4-Owned Construction Projects		
Interview Questions	Response	
Projects designed in-house or contracted?	Both.	
Designers trained in storm water BMP (both during and post construction) implementation?	City engineer has some continuing education. One of the staff with the consulting firm they contract with is a CPESC.	
Checklist used during the design and/or review of public construction projects?	Yes. Mr. Swinehart says it includes storm water.	
Are projects greater than one acre covered a general construction permit (has an NOI been submitted)?	Rarely do City projects reach 1 acre.	
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?	Uses ODOT specs.	
In-house inspection staff inspect projects? If so, which department?	City Engineer inspects both the municipal and private construction projects.	
Project inspectors trained (for both during and post construction storm water management)? Frequency:	Yearly training. Attends training provided by ODOT and County.	
If contracted inspectors are utilized, are minimum inspection, maintenance and reporting requirements specified in the contract?	(Have contracted in the past). Yes.	
Applicable Documents	Reviewed	Obtained
MS4-owned project storm water design standards and/or checklist	Checklist for preliminary plans. They are working to revise checklist for final plans.	A copy of Preliminary Plan Checklist, Site Plan Review Checklist, Site Plan Guidelines.
Contract language for active public project not developed or inspected in-house	No. This varies contract by contract. There is no typical language.	No.

Project Name: I/I Reduction Program - Phase 2	
BMPs adequately incorporated into the plan to address	No

MUNICIPAL STORM WATER PROGRAM EVALUATION

Project Name: I/I Reduction Program – Phase 2	
erosion control, sediment control, housekeeping?	
Design specifications and details for all BMPs included on the plans?	No
Standards conditions include erosion and sediment control or storm water provisions?	Some.
Maintenance requirements specified?	No

Notes

MS4-Owned Construction Projects - Preliminary Plan checklist does not include specific storm water or site design standards. It is a checklist for plan content/completeness, not a checklist for evaluation of the plans. Shop drawing checklist is similar. Standard conditions on the I/I Reduction Program- Phase 2 plans included ODOT Spec 659 Seeding and Mulching and Spec 207 Temporary Soil Erosion and Sediment Control. However, there was no language on non-sediment controls, such as dewatering, concrete rinse, or material storage. Non-sediment pollutant controls must be addressed during plan review. Detail drawings, design specifications, and maintenance requirements for all BMPs must be included in the plans when projects are part of a larger common plan of development or sale that will result in a cumulative earth disturbance of 1 acre or more. Such information should also be included in plans where the earth disturbance in larger common plan of development or sale in less than an acre.

Detailed information on procedures for construction and post construction storm water management (for water quality purposes) plan review must be included in the SWMP. When describing the plan review process, please include information on: plan reviewer training (frequency and type), plan review criteria - including any checklist used or technical guidance provided to developers/contractors, if NOI submittal is verified during review, if a pre-project meetings are conducted with the developer and/or contractor, what standard conditions of approval include erosion and sediment control and/or general storm water requirements, what standard conditions of approval include post construction storm water management requirements. Technical guidance used by reviewers and developers/contractors should include BMP selection, design, siting, and construction criteria, any performance criteria, and operation and maintenance requirements. When plan development for municipal projects is contracted out, describe what procedures are in place to insure that the City's regulations and specifications are included in the plans.

The Small MS4 NPDES General Permit includes the following performance standards to set minimum permit expectations for program implementation: 1) Preconstruction storm water pollution prevention plan review for all projects with an earth disturbance of one acre or more for erosion and sediment controls and non-sediment pollutant controls related to construction activities is required. 2) Pre-construction site plan review of 100 percent of projects from construction activities that result in a land disturbance of greater than or equal to one acre to ensure that required post construction controls are designed per requirements is a permit condition. 3) Construction and post construction storm water management ordinances shall, at minimum, be equivalent with the technical requirements of the current NPDES Construction General Permit (CGP). You must revise your SWMP, if needed, to meet these standards by May 26, 2011.

In Ontario's Code (Section 937.04 Scope), it appears that the chapter (requiring the filing of storm water management plan and obtain storm water management permit) does not apply to single family dwelling units; public transportation, utilities, and drainage improvements or maintenance thereof undertaken by a government agency or political subdivision. Also, Section 937.05 doesn't seem to address all sites that are

MUNICIPAL STORM WATER PROGRAM EVALUATION

Notes

part of a larger common plan of development or sale, as it appears to limit requirements to 'same person or their predecessor/successor in title'. It appears that the language in this code will need to be revised to be consistent with the CGP.

The Small MS4 NPDES General Permit also requires the City to include in its annual report: (1) number of applicable sites in your jurisdiction requiring post-construction controls, (2) number of pre-construction storm water pollution prevention plan reviews performed, (3) number of inspections performed to ensure as built per requirements, and (4) number of long-term operation and maintenance (O&M) plans developed and agreements in place.

MUNICIPAL STORM WATER PROGRAM EVALUATION

Sanitary Sewer /Illicit Discharges	Response
Interview Questions	Response
Sanitary sewer systems evaluated to determine storm sewer cross-connections or overflow locations?	Yes. Smoke tested sanitary.
Extent of infiltration and inflow into storm sewer system:	<p>City not asked. However, City does have an overflow on the separate sanitary sewer system.. During wet weather events, the City may pump from a manhole preceeding the Rock Road lift station to prevent sewage backup into homes. The discharge enters a tributary adjacent to the pump station. According to Ohio EPA records, the City is currently in the process of five year plan for sanitary lateral replacement and repair. The second phase of the plan was recently completed. The City is to submit a report on the effectiveness of their improvements/repairs this year. Please note that any discharge of sanitary sewage into the storm water drainage system not addressed under a separate NPDES permit is an illicit discharge and must be addressed in the SWMP. We encourage the City to continue their progress towards eliminating these types of discharges.</p>
MS4 dry weather outfall screening done? How often?	Yes. Have done detention basins. Are working towards doing the rest of the system. According to 2008 Annual Report, 128 outfalls inspected annually.
Illicit Discharge Detection and Elimination Ordinance Passed? Section of Code/Date:	Yes. According to annual reports, Ordinance 03-49 was effective 9/4/03.
Written illicit discharge tracking procedures in place?	2008 Annual Report; KE McCartney has developed "Storm Sewer Outfall Screening Program Manual".

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

Permittee: City of Ontario	
Address of facility: 3375 Milligan Road, Ontario, OH	Size of facility: N/A
Date of visit: September 29, 2009	
Provide the name(s) and title(s) of permittee staff present during inspection	
Name	Title
Jerrold Swinehart, PE	City of Ontario Engineer
Paul Gleisinger	Street/Sewer Supervisor
Ken Burrer	Street Foreman
Evaluator Observations:	
SWPPP or storm water plan	
Has the maintenance facility developed a SWPPP or storm water plan?	No.
Does the plan include a site map, list of pollutant sources, BMPs, and maintenance procedures?	No.
Does the permittee conduct and document periodic inspections of the facility?	Reportedly conducted, but not documented.
Are storm drains labeled and free of debris?	Drains not labeled, but appear free of debris. No discharges observed.
Vehicle maintenance, fueling and washing	
Are vehicle maintenance activities conducted in a designated place not exposed to storm water?	Yes
Are fueling stations properly designed with spill kits nearby?	Yes
Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer?	Inside buildings. Floor drains directed to oil/water separator and then to sanitary sewer.
Material storage	
Are all materials that are potential storm water contaminants stored under cover or in secondary containment?	Except for mulch, tree limbs, stone, concrete, asphalt.
Hazardous waste management	
Are all hazardous materials properly labeled and stored to prevent exposure to storm water runoff?	Yes.
Waste management	
Are waste bins covered with waste properly disposed in containers? Are containers sealed (no rust holes, drain holes, or gaps)?	No. Material from catch basin cleaning/street sweeping is placed in a stockpile.
Spill response	
Does the facility have a spill response plan, and are spill kits readily available?	SPCC not available. Spill kits/response materials were available.

Notes or additional information: Overall: No staining observed on pavement around buildings. No dead vegetation observed. No discoloration in waterways passing through site.

Vehicle maintenance performed inside buildings. Used oil storage tanks were labeled and inside. They do run engines prior to removal of oil filters and then put filters in tub to drain. Used oil filters must be hot drained. There are EPA guidelines on how to properly "hot drain" filters. Acceptable "hot draining" methods include:

- Puncture back valve or dome end and hot drain,
- Hot drain and crush, or
- Dismantle and hot drain.

Hot draining means that oil is removed at close to engine temperature, when oil flows freely. Filters need to drain for 12 (minimum) to 24 hrs. Once hot drained, filters can be thrown in the dumpster with your other solid waste, provided they are not terne-plated filters. It's recommended, though, that you consider sending the filters to a scrap metal company for recycling.

Waste oil is hauled away once per year. Hillman Precision picks up and hauls waste oil to burn. Used oil - As a generator, the City's options for disposal of used oil are to either burn it onsite for heating or have it hauled by a licensed EPA hauler. To give used oil to another individual would classify the City as a marketer which has certain requirements. For more on used oil handling please see <http://www.epa.ohio.gov/LinkClick.aspx?fileticket=XEg%2fu%2bpZGaM%3d&tabid=3923> or contact Amber Hicks, Ohio EPA Division of Hazardous Waste, at 419-373-3082.

Drums with (unused) vehicle fluids are kept inside on an upper level. Dispensing hoses convey vehicle fluids from this area to vehicle maintenance areas for refilling. Floor areas fairly clean. Floor drains reported directed to oil/water separator and then discharge to sanitary sewer. There is a dry erase board in the break room for tracking vehicle/equipment maintenance. It includes information on Vehicle/equipment mileage and last service date.

Fueling area has two 3000 gallon tanks: diesel and unleaded gasoline. Located behind the buildings, the area has a canopy, double walled tanks, secondary containment berm around the fuel pumps, and spill and fire response equipment. Some of the material inside the spill kit appeared to have been shredded and was in need of replacement. Fueling shut off switch located on south side, outside of salt storage building. The garbage can in fueling area was located under the canopy. A waterway is located in the treeline behind the fuel tanks.

Outside storage of equipment: trailers, mower deck, lawn roller, dethatcher, metal light posts, metal sign posts, concrete manhole grade rings, metal manhole cover rings (frames), construction barrels and signs, drainage tile, plastic pipe, iron pipe, plastic drums used as park garbage cans, plastic garbage cans, picnic tables, concrete pipe, catch basins, stone piles, broken asphalt and concrete piles, dirt/street sweepings piles (see previous comments on proper disposal), logs, tree branches, and wood mulch. The City must maintain documentation that street sweepings, catch basin cleanings, and construction debris are properly disposed. The City should be aware that storm water passing through yard-waste, street sweeping, and catch basin cleaning material may be considered leachate. The MS4 permit does not authorize the discharge of leachate. The spoils area must be monitored to prevent this. Leachate is a wastewater and would need to be managed as such.

Chain saw gas cans stored in metal cabinet labeled flammable. Pesticide/Fertilizer storage cabinet. These cabinets are labeled, located inside, with secondary containment provided on the bottom of the cabinets. Used Antifreeze drum was stored inside and labeled.

At the culvert/access drive off Cal Miller Lane, south of the maintenance buildings, broken asphalt was used as rip-rap on the east side of the waterway; residual concrete poured on the west side. U.S. Army Corps of Engineer's Individual 404 permits and Nationwide Permits (NWP), as well as Ohio EPA Section 401 Water Quality Certifications and Isolated Wetland Permits, govern the placement of fill in waters of the U.S. and

waters of the state. It is a general condition of these permits that fill in said waters may not consist of asphalt. Broken asphalt should not be used as rip-rap or to stabilize drainageways. This material should be removed.