Environmental Protection Agency

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

F

August 17, 2010

RE: LORAIN COUNTY
BLACK RIVER WATERSHED
SHEFFIELD TWP.
MUNICIPAL STORM WATER PROGRAM

Mr. Dave Newsome, Trustee
Dave Underwood, Road Superintendent
Sheffield Township
5166 Clinton Ave.
Lorain, OH 44055

Dear Mr. Newsome:

Thank you for getting in touch with me this morning to schedule an inspection of your municipal storm water program. The inspection will be conducted at 1:00 p.m. on September 20, 2010 at the Township offices located at the above address. This program is a requirement of Ohio Administrative Code 3745-39-03 and the Ohio EPA General Storm Water National Pollutant Discharge Elimination System (NPDES) Permit for Small Municipal Separate Storm Sewer Systems #3GQ00117*BG.

Our previous correspondence dated June 15, 2010, provided you with information on what to expect during our inspection and the documents that you should have available for Ohio EPA on that date. The inspection will focus on implementation of Minimum Control Measure (MCM) #6: Pollution Prevention and Good Housekeeping, but will contain questions about all six MCMs. For services provided by the County on behalf of the Township, it is advisable that you invite the appropriate County representative to be present at the inspection to answer those questions. Be sure to have a copy of any Memorandums of Understanding (MOUs) between the Township and County office to document the services that are to be provided.

Ohio EPA understands that the trustees have limited availability for the audit during normal business hours. To assist you in preparing for the audit, I am sending you a copy of the questionnaire that will be used for the interview portion of the day. Because a trustee will be unavailable until late in the afternoon, please prepare answers to the questions that cannot be answered by the road superintendent or County representative and have them available to me on the date of inspection.

I look forward to meeting with you next month. If you have any questions about the intent or meaning of the questions, please contact me at (330) 963-1145 or via e-mail at dan.bogoevski@epa.ohio.gov.

Sincerely,

Dan Bogoevski

Dan Bogoevski
District Engineer
Division of Surface Water

DB/mt

cc: Nancy Funni, Lorain SWCD
Bill Holtzman, Lorain County Engineers Office
Jim Boddy, Lorain County Health Department

Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087-1924

330 | 963 1200
330 | 487 0769 (fax)
www.epa.ohio.gov

Municipal Storm Water Program Evaluation

MS4 Maintenance Component Worksheet

Date of Evaluation	September 20, 2010
Evaluator Name, Title	Dan Bogoevski, DSW, NEDO
MS4 Permittee	Sheffield Twp. (Lorain Co.) Facility Permit #3GQ00117*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**
Dave Underwood	Road Superintendent Sheffield Twp	(440) 935-2242 daveandbarbbu@yahoo.com
Linda Eckhart	Project Inspector Lorain County Engineer	(440) 329-5590 leckhart@loraincounty.us
Not present for interview, but briefed afterward: Dave Newsome	 Township Trustee	 (440) 308-6211

MS4 Mapping	
Interview Questions	**Response**
Outfalls and receiving waters mapped? Catch basins? Pipes, ditches, other conduits? Public stormwater facilities (BMPs)? Private stormwater facilities (BMPs)?	**NO** **YES** **NO** N/A, Twp does not own any facilities **NO**
How are maps used (i.e. tracking illicit discharges)?	MS4 map is used to instruct staff how to respond to drainage issues. It makes them aware of which way water flows.

Applicable Documents	Reviewed	Obtained
Map(s) of MS4 system	YES	YES

Notes
MS4 Mapping under NPDES Permit #OHQ000001
Although the Sheffield Township has created a storm sewer system map, the map does not quite satisfy

Notes
the requirements of the Ohio EPA General Storm Water NPDES Permit for Small MS4s #OHQ000001. The NPDES permit required the Township to create a storm sewer system map that shows the location of all outfalls and the names and location of all surface waters of the State that receive discharges from those outfalls. The map was to be created by April 7, 2008. Sheffield Township's map has catch basins marked, the direction of flow, a designation of open ditch locations (lines) and assumed piped locations (no lines), but interestingly, no points of outfall marked on the map and no names of the receiving waters. Failure to produce the map by this date is a violation of Part 3.2.3.1.2.1.2 of the NPDES permit and Ohio Revised Code 6111.04 and 6111.07. To correct this violation, Sheffield Twp must add the locations of outfalls and the names of the receiving waters. For discharges to a neighboring MS4, e.g., City of Lorain or Lorain County Metroparks, identify the point of discharge to the MS4 and contact the MS4 operator to obtain the ultimate point of discharge of the interconnected MS4 in question. The Township believes that there are only 3 points of outfall from its MS4: 1. E. 36th St. Storm Sewer – belongs to City of Lorain 2. Swale 1 into Lorain County Metropark property by Riverside Dr. 3. Swale 2 into Metroparks property on south side of N. Ridge Rd. **Mapping Requirements under NPDES Permit #OHQ000002** As a reminder, the NPDES permit in effect from 2009-2014 (#OHQ000002) requires that all catch basins and publicly-owned storm sewers, ditches and storm water management facilities be mapped. In addition, the map must show privately-owned storm water management facilities constructed as post-construction BMPs for new development or redevelopment which has occurred since April 21, 2003. This must be completed by June 6, 2014. A review of NPDES permits issued for storm water discharges associated with construction activity in Sheffield Twp since April 21, 2003, indicates that National Bronze added an extended detention basin when the facility was expanded in 2008. Please be sure to add this privately-owned storm water management facility to your MS4 map. Further, it appears that the Township does not have a system for adding information to the MS4 map as development and redevelopment occurs or when new outfalls are identified or created.

Catch Basin Cleaning	
Interview Question	**Response**
Schedule established for inspections and cleaning?	**YES** Catch basins have a scheduled cleaning in Spring and late Fall. However, the Township cleans out catch basins continually throughout the year as needed, i.e., after a storm and probably once a month. Will pick out trash that collects in ditches and in catch basins.
Is cleaning and maintenance of catch basins tracked:	**YES** Daily ledger is filled out but it is not specific to catch basin cleaning only.
How are spoils materials disposed of?	Material removed from catch basins is spooned out into a dump truck. At the end of the day, the material is transferred into a garbage truck. The material is transferred from the garbage

	truck to a dumpster, which is picked up once or twice a year for disposal at the Lorain County Landfill. Please submit records indicating the dates and quantities of catch basin cleanings disposal for 2010.
Are storm drain pipes inspected? Proactive or only in response to blockage event?	**YES** In response to a blockage event. Blockage is not a regular event. The City of Elyria allows the township to use their camera truck when needed to inspect pipes. Last time was in the Spring of 2010 on Liberty Ave to investigate a continuous water flow into a catch basin, but it turned out to be a broken county waterline.

Applicable Documents	Reviewed	Obtained
List of active municipal construction projects	Does not exist	Does not exist
As of the date of this interview, Ohio EPA records indicate the following construction projects are active in your community: <u>These projects are all in the Lorain County Engineer's name:</u> 3GC01394*AG Broadway Ave/Taylor St SSX 2006 1.28 ac 3GC01391*AG Dutton Ave SSX 2006 1.25 ac 3GC01389*AG Rolling Heights Allotment SSX 2005 2.95 ac <u>These are private develop projects in Sheffield Twp:</u> 3GC03757*AG National Bronze on W. River Rd. 2008 9.72 ac	 Status Unknown Status Unknown On Hold DONE	 Submit NOT

Notes

Catch Basin Cleaning

The ledger format may make it difficult to track catch basin cleaning activities accurately. Tracking can be improved by recording clean-out activity on a map or by setting up a specific schedule for this activity. Better tracking of information will help you identify the catch basins that require more frequent clean-out and prevent catch basin cleaning from being overlooked.

Please keep in mind that catch basin cleanings are solid waste and any liquid that comes in contact with or is released from solid waste is leachate, a wastewater. The NPDES permit for discharges from your MS4 does not authorize the discharge of wastewater. Measures must be taken to prevent the discharge of any liquid that comes into contact with catch basin cleanings. Although we did not observe any evidence of leachate discharge associated with catch basin cleaning activities when we inspected the municipal maintenance facility, please note that dump trucks leak. It may be more prudent to place catch basin cleanings in a water-tight vessel when spooning out cleanings from catch basins.

Construction Activities

The Township relies on County regulations to implement its construction site program. The Township had a Memorandum of Understanding with the Lorain Soil & Water Conservation District (SWCD) but the SWCD terminated the MOU in April 2010. On December 22, 2010, Ohio EPA sent the Township a Notice of Violation regarding this matter but has not yet received a response regarding this matter. You must provide Ohio EPA with a response to this NOV or face escalated enforcement action. County

regulations require the submittal of an Erosion and Sediment Control Plan to the SWCD for review and approval. The SWCD inspects active projects within the Township (see note following this paragraph). The SWCD has the authority to issue a stop work order when construction projects that disturb 1 or more acre begin without submitting an ESC plan. Other issues of non-compliance can be referred to the County prosecutor for enforcement per the process established in Ohio Revised Code 307.79. Thus, this program was established to meet the minimum expectations for construction plan review, site inspection and enforcement.

NOTE: The minimum required inspection frequency on active construction sites is once per month. Ohio EPA has not yet conducted an audit of the Lorain County construction site program to determine if the minimum inspection frequency is being met. If the Township chooses to re-enter into an MOU with Lorain SWCD, please ensure that this minimum inspection frequency is reflected in the agreement.

As of the date of this interview, there is only one active construction project in the Township. A new fire station is being constructed on Broadway Ave, however less than 1 acre is being disturbed. The Township and Lorain County Engineers' Office indicate that the other projects listed above as active in the Ohio EPA NPDES permit database are either completed or on hold. Please review the status of the projects listed above and notify the operators of sites that have reached final stabilization, e.g., National Bronze, or projects that are on hold and not likely to begin any time soon that they should terminate NPDES permit coverage by submitting a Notice of Termination (NOT) to Ohio EPA. If the Township becomes an operator of construction activities in the future, please be aware that coverage under the Ohio EPA General Storm Water NPDES Permit for Construction Activities is to be terminated within 45 days of reaching final stabilization.

The Township anticipates 2 road projects to begin in October 2010. They involve milling and repaving of an existing roadway. However, parts of the project will result in road widening and full-depth pavement repair. Please be aware that road construction projects which disturb 1 or more acre of land are subject to the Ohio EPA General Storm Water NPDES Permit for Construction Activities #OHC000003 and must develop and implement a Storm Water Pollution Prevention Plan. Coverage under this NPDES permit is obtained by submitting a Notice of Intent (NOI). Further information is available on our website at www.epa.ohio.gov/dsw/storm//construction_index.aspx.

Stormwater Management Facilities Operation and Maintenance	
Interview Questions	**Response**
Public facilities inspected? Frequency:	**N/A** The Township does not own any storm water management facilities at this time.
Private facilities inspected? Frequency:	**NO** But, the road superintendent does inspect the National Bronze basin for garbage like tires, etc., but not as intended with the long-term maintenance plan as the basis of inspection.
Checklist used for inspections?	**NO**
Have maintenance standards and procedures been established for these facilities?	**NO**

Stormwater Management Facilities Operation and Maintenance		
Interview Questions	**Response**	
How is maintenance prioritized? Is data evaluated to target maintenance resources?	NO	
Applicable Documents	**Reviewed**	**Obtained**
Inspection checklist	Does not exist	

Notes

Long Term Maintenance Plan for Post-Construction BMPs

Minimum Control Measure #5 in the NPDES permit program for small MS4s requires the Township to enact regulations that require structural and/or non-structural post-construction water quality BMPs on all new development and redevelopment that disturbs 1 or more acre of land. Lorain County passed an ordinance requiring post-construction BMPs to treat the Water Quality Volume in 2009. As new development and redevelopment occurs within Sheffield Township, more and more of these structural controls will exist in your township. The NPDES permit requires the Township to establish a program to ensure long-term maintenance for post-construction BMPs. The Township is yet to establish a long-term maintenance program for post-construction BMPs in the community. The program to ensure long-term maintenance of post-construction BMPs was to be established no later than April 7, 2008 (end of Year 5 under NPDES permit #OHQ000001).

Like the construction program, the Township may enter in an MOU with another party to implement this program on your behalf. Our records show that the Township does not currently have an MOU with Lorain SWCD or the Lorain County Engineers' Office for this program. Thus, the responsibility to develop and implement this program rests with the Township until such time that a valid MOU is in place with one or both of these third party service providers.

A good long-term maintenance program will ensure that the responsible party is complying with a long-term maintenance plan developed per standards set by the Township. The Township may create their own standards or adopt standards developed by others. If the Township has a valid MOU with the Lorain County Engineer and/or Lorain SWCD for this program, these organizations will establish the standards and the Township may rely upon them. The County post-construction regulations and Ohio EPA requires developers to include a long-term maintenance plan in the Storm Water Pollution Prevention Plan (SWPPP). The plan must identify the party responsible for long-term maintenance of BMPs and the routine and non-routine tasks that must occur to keep the BMP functioning as intended. In addition, the plan includes a site map indicating the type and location of post-construction BMPs and the maintenance and conservation easements needed to ensure access or preservation in perpetuity. In essence, the long-term maintenance program is a system to ensure that this long-term maintenance plan is being followed.

Guidance for developing a long-term maintenance program can be found in the manual titled ***Managing Stormwater in Your Community:*** *A Guide for Building an Effective Post-Construction Program* (Center for Watershed Protection, 2009). The manual can be downloaded for free from the Center for Watershed Protection website at: http://www.cwp.org/documents/cat_view/76-stormwater-management-publications.html. The manual includes inspection checklists which can be used in your long-term maintenance program. Additional guidance for the design, maintenance and operation of post-construction BMPs can be found in ***Rainwater and Land Development,*** *Ohio's Standards for Stormwater Management, Land Development and Urban Stream Protection* (Ohio Dept. of Natural Resources, 2006) available at http://www.dnr.state.oh.us/tabid/9186/default.aspx and the US EPA Menu of BMPs available at http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm?action=min_measure&min_measure_id=5.

The long-term maintenance program is to include all public BMPs and those privately-owned BMPs installed since April 21, 2003. To meet the mapping requirements of the NPDES permit (discussed in the first section of this report), the Township will develop an inventory of these structures. Be sure that your program includes a method for updating this information as new structures are built or existing structures are removed from service.

The program for long-term maintenance must also include an enforcement mechanism to ensure the responsible party repairs or takes other corrective action on a post-construction BMP. If the Township enters into an MOU with the Lorain County Engineer and/or Lorain SWCD for this program, you will need to work with these third party service providers to develop an enforcement escalation protocol. Although the County regulation gives Lorain SWCD the ability to issue a stop work order on sites where construction has started but an SWPPP has not been submitted for review, the Township may have prevented the construction from starting in the first place by withholding a building permit or zoning permit. Thus, it is important for the Township and County to sync up its enforcement tools so that the program works in a cohesive manner.

Road Maintenance	
Interview Questions	**Response**
Streets regularly swept? Frequency:	**NO** However, a ditch cleaning program is in place. The street department will pick out trash and trim vegetation in ditches with a weed whacker. If they have to repair a broken tile (average frequency is 2 times per month), they bring soil back to maintenance garage and store on ground with pipe.
Frequency based on water quality factors (e.g. proximity to streams)?	**YES** Roadways with high litter loads are done first (have an open dumping issue, so they get to those areas first).
How are spoils disposed of?	Trash and debris collected during ditch cleaning is placed in a dumpster for disposal at a landfill. Due to the limited nature of the ditch maintenance program, few spoils are generated by ditch cleaning. The Township does repair broken tile (pipes) on an average of twice per month. The spoils from this operation are brought back to the maintenance garage and stockpiled outdoors. Please be sure that trash and debris are picked out from spoil piles and placed in a dumpster immediately after spoils are brought to the maintenance facility. My inspection of the spoil piles revealed that there is trash and

Road Maintenance	
Interview Questions	**Response**
	debris mixed in with the spoils. Runoff from trash and debris is leachate, a wastewater. The NPDES permit does not authorize the discharge of leachate.
Does the community collect road kill? What do they do with the carcasses?	**YES** Carcasses are double-bagged and thrown into the garbage truck.
Does the community have a leaf collection program? What do they do with the collected leaves? **NOTE:** Landfills have been banned from accepting yard waste, so MS4 cannot place leaves and yard waste in dumpster. Must be composted at a licensed Class IV composting facility. Communities may temporarily store leaves awaiting transport to a composting facility but leafate must be prevented from discharging.	**YES** Leaves are stored in the maintenance yard , composted and given back to residents for compost. Ohio EPA records do not indicate that Sheffield Township has obtained a Class IV composting license to operate a composting facility. This is a violation of Ohio Administrative Code 3745-27-45(A)(2). Please contact Clarissa Gereby of our Division of Solid and Infectious Waste Management (DSIWM) at (330) 963-1224. Controls such as berms have not been implemented to prevent the discharge of leachate associated with composting operations. The NPDES permit does not authorize the discharge of leachate. Leachate currently discharges onto an adjoining, wooded property.
BMPs used during road maintenance activities? Describe types of road maintenance conducted by community staff and the BMPs used	**NO** Crack seal roads, pothole patching with cold patch, add stone to berms. Everything else is contracted out. Management of these contracts is through the County Engineers' office. No language in contract specific to storm water BMP implementation.
BMP guidance available to field staff?	**NO** But, the road superintendent has attended Ohio EPA training sessions on storm water pollution prevention.
Deicers used by MS4?	**YES**

Road Maintenance	
Interview Questions	**Response**
Type and amount of deicer and additives tracked? What measures are being taken to minimize the application of deicers?	**YES** The Township does not have a written plan to reduce the amount of deicer application, but did indicate that salt is applied before a freeze as an anti-icing measure and that salt is typically only applied at intersections and "half-way down" roads. Salt is stored in a shed.
Sand/salt swept up after application? How soon?	**YES** Pushed back into shed at the end of the day, but if they finish in the middle of the night, they wait until the next morning.
Does your community operate a snow stockpile yard to store snow that has been removed from community streets and parking lots? If YES, location of the yards: Has your community considered implementing best management practices to control the discharge of pollutants from snowmelt associated with snow storage yards? If YES, what BMPs have you implemented?	**NO** **N/A**

Applicable Documents	Reviewed	Obtained
BMP guidance	Does not exist yet	
Street sweeping records	No separate record kept. Recorded as part of daily ledger.	
Deicer application records	**YES**	

Notes
BMPs for Road Maintenance Projects Township staff that performs road maintenance activities must be trained in storm water best management practices to prevent the discharge of sediment and other pollutants when conducting road maintenance activities. ***Rainwater and Land Development*** contains BMPs appropriate to typical construction activities. When road maintenance is contracted, requests for proposal must require the implementation of

Notes
sediment and erosion controls and other appropriate BMPs. Contract language between the Township (or County) and the contractor shall include provisions for the implementation of storm water BMPs. The Township (or County) must add such language to future RFPs and contracts. **Pavement De-Icing Practices** The Township uses rock salt (sodium chloride) for deicing and uses an average of 300 tons per year. Usage is tracked by adding purchases to beginning inventory and subtracting the ending inventory. The Township takes inventory in May each year, at the end of the deicing season. Because the Annual Report is on a calendar year basis, salt usage should be tracked and reported on a calendar year basis, i.e., January through December, rather than on a deicing season basis. Our review of salt application records indicates that improvements can be made to more accurately track salt usage. The notebook used to track salt orders did not include a beginning inventory. The Township does not use cinders or other additives. Salt is stored in a shed with a roof and sidewalls, but an exposed front. Ohio EPA recommends the installation of a curtain, door or other such cover to eliminate potential exposure to rain, snow, snowmelt or run-on. The shed has a capacity of 250 tons. The Township does not vary the speed of the salt spreader and does not calibrate salt spreading equipment. Please be aware that these practices will reduce the amount of salt application and may result in cost savings. Spreaders that alter the spread rate based on vehicle speed are available. The Salt Institute recommends that spreaders be calibrated at the beginning of the deicing season and regularly thereafter. For further information on how to calibrate spreaders please go to www.saltinstitute.org.

Flood Management	
Interview Questions	**Response**
Inventory of flood management structures completed?	**NO** The Township does not own any flood management structures, but does not have an inventory of privately-owned flood control structures in the Township.
Structures been assessed for stormwater retrofit?	**NO** There are no plans for any flood control projects in the future. To date, the Township has not had flooding problems. Should the Township move forward with a flood control project in the future, please be aware that the NPDES permit includes an obligation that the project be evaluated to include water quality benefits to the maximum extent practicable.
New structures include water quality considerations?	**YES**

Flood Management	
Interview Questions	**Response**
	See Notes about MOU with Lorain SWCD and Lorain County Engineer

Applicable Documents	Reviewed	Obtained
Inventory	N/A – claim they don't own	

Notes
MOU with Lorain County Lorain County did pass an ordinance in 2009 requiring structural post-construction water quality BMPs for all sites where the larger common plan of development or sale disturbs 1 or more acre of land. Post-construction plan review is done by Lorain SWCD and the Lorain County Engineer. However, as indicated in our NOV dated December 21, 2010, the MOU between the Lorain SWCD and Sheffield Twp was terminated. Our records do not indicate that the MOU was renewed or if the MOU between the Township and Lorain County Engineer and/or Lorain SWCD has been updated to include as-built or long-term maintenance inspections for post-construction water quality BMPs. Please provide Ohio EPA with an update on the status of your MOU with the Lorain SWCD and Lorain County Engineer. If you have renewed your MOUs, please provide me with a copy of the executed documents. **Storm Water Retrofitting** It is quite likely that future generations of the NPDES permit will include a stormwater retrofit requirement to one degree or another. US EPA is currently evaluating criteria for such a requirement and is expected to promulgate a requirement in 2012. The goal of storm water retrofitting is to install storm water quality practices where none had previously existed, largely because such requirements were not in place at the time those areas were developed. Although one of the easiest and cheapest ways to meet this requirement is to add a water quality component to an existing flood control structure, e.g., changing the outlet structure of a detention basin so that it provides extended detention of the Water Quality Volume, the Township indicated that they do not own any such structures. Thus, should a storm water retrofit requirement be put into effect in future generations of the NPDES permit, the Township will need to locate retrofits in other locations, e.g., within roadside ditches or on township-owned property like the township hall. The Township may want to start developing an inventory of possible retrofit projects in anticipation of future NPDES permit requirements.

Facilities Operation & Maintenance	
Interview Questions	**Response**
Inventory of MS4 facilities complete (i.e. facilities owned and operated by the MS4)?	NO Although a SWMP exists, it does not include a list of facilities owned and operated by the Township. Please add this to the SWMP and ensure that it is updated as needed, e.g., new fire station on Broadway.

Facilities Operation & Maintenance	
Interview Questions	**Response**
Types of facilities included *These need their own NPDES storm water permit for industrial activities, if there is a discharge of runoff from these operations:*	**Response** / **SWP3 Developed?**
• Landfills Type:_____	**NO** / N/A since do not own
• Airports	**NO** / N/A since do not own
• Shipping Ports or Marinas	**NO** / N/A since do not own
• Steam Electric Power Plants	**NO** / N/A since do not own
• Wastewater Treatment Plants ≥1 MGD or with a pretreatment program	**NO** / N/A since do not own
These do not need their own permit, but do have to develop an SWP3 unless noted as N/A:	**Response** / **SWP3 Developed?**
• Impound Lots	**NO** / N/A since do not own
• Leaf Collection Yards ✓ See Composting Operations below.	**NO** / N/A
• Maintenance Yards ➢ How many do they operate? ___1___ ➢ List facility names/locations: 5166 Clinton Ave. Lorain, OH 44055	**YES** / **NO** An SWP3 must be developed for this facility by June 6, 2011.
• Composting Operations ✓ No discharge of leachate permitted	**YES** / **NO** Because this operation is part of the activities at the Maintenance Yard, a separate SWP3 is not required for this facility as long as the SWP3 for the Maintenance Yard includes BMPs for the composting operations. **NOTE:** Ohio EPA records do not show that the Township has obtained a Class IV composting license.
• Solid Waste Transfer Stations or Operations	**NO** / See Notes
• Parks & Cemeteries ➢ How many in UA? _____ ➢ List facility names/locations:	**NO** / N/A
• Parking Lots ➢ How many do they operate? ___1___ ➢ List facility name/locations: 5166 Clinton Ave. Lorain, OH 44055	**YES** / N/A

Facilities Operation & Maintenance	
Interview Questions	**Response**
• Bus Terminals • Vehicle Maintenance Garages ➢ How many do they operate? __1__ ➢ List facility name/locations: 5166 Clinton Ave. Lorain, OH 44055	**Response** / **SWP3 Developed?** **NO** / N/A since do not own **YES** / **NO** Because this operation is part of the activities at the Maintenance Yard, a separate SWP3 is not required for this facility as long as the SWP3 for the Maintenance Yard includes BMPs for the Vehicle Maintenance Garage.
Facilities inspected? Frequency:	**YES** Currently, the Township inspects trucks for fluid leaks once per week. No other inspections are conducted for storm water BMPs or SWP3 implementation. The SWP3 for the Maintenance Yard must call for at least one Comprehensive Site Evaluation per year, however Ohio EPA recommends more regular, routine inspections of storm water BMPs. Ohio EPA recommends that inspections be conducted monthly to ensure the adequacy and implementation of BMPs contained in the SWP3.
Checklist used?	**NO** The goal of the MS4 program is to develop standard operating procedures for the MS4. As part of that goal, Ohio EPA recommends that the Township develop a checklist by which to conduct inspections of Maintenance Yard. The use of a checklist should result in a more complete inspection and will provide better consistency between inspectors or when personnel changes. An blank inspection checklist should be included in the SWP3.
Staff which perform the inspections (department or agency:	Dave Underwood, road superintendent, conducts inspections currently and will likely be the person to conduct the inspections per the SWP3. As a reminder, the Township must complete the SWP3 and begin implementation by June 6, 2011. As of the date of this inspection, the Township has not yet begun this effort.

Facilities Operation & Maintenance	
Interview Questions	**Response**
Is there a designated stormwater contact person for each facility?	**YES** Dave Newsome, Township Trustee, is in charge of the MS4 program implementation in total.
Describe enforcement procedures used to address noncompliance on a MS4-owner facility, i.e., what disciplinary measures are taken against those that do not implement standard operating procedures?:	Dave Underwood is the Township's only full-time employee. There are two other part-time employees, but no more than 2 total staff on payroll at one time. Mr. Underwood is part of government employees union and there is a discipline procedure in place through that contract.
Parking lots owned/operated by the permitee swept? Frequency? Do you operate any asphalt parking lots? Do you use any coal tar-based sealants on those asphalt parking lots? **NOTE:** Some MS4s have banned the use of coal tar-based sealants in their communities. Research from the University of New Hampshire Stormwater Center and by the City of Austin, TX, has shown these sealants contaminate soil and runoff with PAHs and benzo(a)pyrene, a known carcinogen. If a sealant must be used, asphalt-based sealants are preferred.	**YES** As needed, but estimated to be 4 times per year. Use blower to one general area and sweep it up. Do not blow at the storm drain or across it. **YES** **NO**
Do you have any combined sewer systems? If yes, do you have any combined sewer overflows? ➢ How many? _____ ➢ Do you track frequency and volume? Are you aware of any illicit cross connections between your sanitary sewer and MS4? If so, what is your plan to eliminate this illicit discharge?	**NO** **N/A** **NO** The NPDES permit requires the Township to develop a program to actively identify sources of illicit discharge to the MS4. **See Notes about IDDE Program below.**

Facilities Operation & Maintenance	
Interview Questions	**Response**
Have you investigated the extent of infiltration and inflow into storm sewer system?	NO
What methods have been used to conduct this investigation?	Do not believe it is a major issue today. They have done a lot of pipe repair in the last few years. On a heavy rain day, Dave drives the streets to look for blockages. Although inflow and infiltration is traditionally thought of as a problem for sanitary sewer systems, please be aware that cracks and loose joints within the storm sewer system allow pollutants to enter the storm sewer system and can be a source of illicit discharge to the MS4. The NPDES permit expects the Township to evaluate this potential source of illicit discharge and take action to remove this source where it is causing a problem.
What are your plans to repair and eliminate this source of illicit discharge?	Rolling Heights area has HSTSs, but don't know which systems are functioning as designed and intended. No HSTS list at audit. Lorain County Health Department needs to provide.
Sewer spill and cleanup procedures in place?	N/A – Sanitary sewers are operated by the City of Lorain

Applicable Documents	Reviewed	Obtained
Facility inventory	Does not exist	
Facility SWPPP	Does not exist yet	

Notes

Storm Water Pollution Prevention Plan (SWP3)

A storm water pollution prevention plan (SWP3 or SWPPP) is required for the following township facility:

Sheffield Township Maintenance Yard
5166 Clinton Ave.
Lorain, OH 44053

The SWP3 should be comprehensive for all municipal operations that occur on this property. As a reminder, NPDES permit #OHQ000002 requires the Township to complete and implement the SWP3 within 2 years of your permit renewal date. Our records indicate that the SWP3 must be completed and implemented **by June 6, 2011**. The SWP3 should be developed using the guidance available from US EPA titled ***Developing Your Storm Water Pollution Prevention Plan:*** *A Guide for Industrial Operators* (EPA Document 833-B-09-002) available for download at www.epa.gov/npdes/stormwater/indust (click on link for Industrial SWPPP Guidance). In addition, this website includes a number of fact sheets. Industrial sectors with information pertinent to operations at your municipal maintenance yard include those for Land Transportation and

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Warehousing Facilities and Hazardous Waste Treatment, Storage and Disposal Facilities. Additional guidance is available on Ohio EPA's website at www.epa.ohio.gov/ocapp/storm_water.aspx (click on archived training materials for "Are You Ready for May 2008?: Pollution Prevention & Good Housekeeping for Storm Water Program Managers" and "Best Management Practice #6: Pollution Prevention at Municipal Garages"). This last workshop is scheduled to be repeated on June 15, 2011, and again sometime in 2012. Please keep your eye on the OCAPP website. We will post agenda and registration information there once it is available. This is a free training opportunity for you and staff that performs municipal maintenance activities courtesy of Ohio EPA and the NE Ohio Storm Water Training Council. **Leaf Composting Operations** Please be aware that facilities that compost yard waste, including collected leaves, may be subject to licensing and rules contained in OAC 3745-27-40 through 3745-27-47. On the date of inspection, we observed leaf piles at the rear of the Maintenance Yard facility and Mr. Underwood indicated that the Township composts leaves obtained through the leaf collection program. Our records do not indicate that Sheffield Township has obtained a Class IV Compost License to operate a composting facility for yard waste. Please contact Clarissa Gereby with our Division of Solid and Infectious Waste Management at (330) 963-1224 to determine if licensing requirements apply to your facility. Further, be aware that storm water runoff from compost piles must be managed such that there is no discharge of leachate from the Maintenance Yard. Composting is a form of solid waste disposal, thus yard waste being composted is a solid waste. Leachate is defined as any liquid that has come in contact with or been released from solid waste and must be managed as wastewater. The NPDES permit for small MS4s does not authorize the discharge of leachate. Thus, if the Township wishes to continue composting operations at the Maintenance Yard, controls must be implemented to prevent the discharge of leachate from the facility. Controls may include, but are not limited to, berming or curbing to allow the collection of leachate for proper disposal of this wastewater. Please contact Chuck Allen in our Division of Surface Water at (330) 963-1110 or the operator of the local sanitary sewer system to discuss wastewater disposal options. **Solid Waste Transfer Operations** Although the Township does not operate a solid waste transfer station, the township does store solid waste in a garbage truck at the Maintenance Yard. The contents of this truck are transferred to a dumpster and then taken to an MSW landfill about twice a year. Please be sure that the SWP3 for the Maintenance Yard includes the solid waste storage and transfer areas as potential pollutant sources. The plan should include BMPs such as good housekeeping to pick up solid waste that may become exposed during the waste transfer process and continued parking of the truck in the garage so prevent exposure during storage. **Illicit Cross Connections** Please be aware that the NPDES permit requires the Township to develop a program to actively identify and eliminate sources of illicit discharge to the MS4. One possible source of illicit discharge is an cross connection of a wastewater source. Dry weather screening is one way that cross connections can be identified. This activity is typically performed by the local health department, however it is equally important to train the road superintendent and the part-time employees that assist him to question any discharge to the MS4 they may observe as they make their rounds of the Township. They should be trained to identify illicit discharge and the potential sources. Training materials are available on the Ohio EPA website at www.epa.ohio.gov/ocapp/storm_water.aspx (click on link for "Are You Ready for May 2008?: Implementing Illicit Discharge Programs and Conducting Illicit Discharge Investigations"). A follow-up training event is planned for Spring or Summer 2011. The agenda and registration

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information will be posted on this website once it is available. **IDDE Program** Ohio EPA records indicate that Lorain County has enacted a resolution which prohibits illicit discharges to the County's MS4. However, it is unclear which department within the County is responsible for administration of this program or whether this program provides illicit discharge services to the townships. A review of the 2009 Annual Report submitted by the Township leaves blank the sections that ask about the number of illicit discharges identified and eliminated. Thus, it appears that Sheffield Twp has not implemented an illicit discharge detection and elimination (IDDE) program as intended by the NPDES permit. With the response to this audit, please describe how this program is being implemented within the Township and include any MOU you have in place for administration of this program with Lorain County, the Lorain County Engineer or Lorain County Board of Health. Once a source of illicit discharge is identified, the NPDES permit requires the Township (or the third party service provider with which the Township has entered into a written agreement) to take enforcement actions to eliminate it, e.g., send a Notice of Violation to the offending party and give them a deadline to remove an illicit cross connection. Please describe the enforcement procedures used by your IDDE program. By the end of the first NPDES permit term, i.e., April 7, 2008, the Township was required to develop a list of all discharging and failing on-lot home sewage treatment systems (HSTSs) that discharge to the MS4 and map their location. The Township could not provide me with this map or list of addresses. Thus, the Township is in violation of Part

Pesticides, Herbicides & Fertilizers			
Interview Questions	**Response**		
Certified applicators used?	YES	NO This entire section is not applicable. The township does not apply any pesticides, herbicides or fertilizers.	
Integrated Pest Management (IPM) practices used?	YES	NO	
Storage location of pesticides, herbicides, and fertilizers:			
BMPs used during application:			
Fertilizer/pesticide application plan utilized?	YES	NO	
Applicable Documents		**Reviewed**	**Obtained**
Fertilizer/pesticide application plan			

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Standards, BMPs, & Outreach	
Interview Questions	**Response**
BMP technical guidance document available to maintenance staff?	**NO, but does have OCAPP materials**
MS4 use contractual staff to complete MS4 maintenance activities?	NO
BMP guidance materials provided to contracted staff?	N/A
Requirement to consider stormwater impacts and utilize appropriate BMPs in contracts?	N/A
Materials used to educate the public regarding stormwater impacts on MS4 property (if applicable, i.e. public spaces):	Pet waste: Litter reduction:

Applicable Documents	Reviewed	Obtained
BMP manual or guidance document		
Contract language for MS4 operation and maintenance activities		

Notes
Training on Storm Water P2 Road superintendent attended Dec 12, 2007, workshop at Ohio EPA on Non-Structural Post-Construction BMPs and March 25, 2008, workshop on Pollution Prevention and Good Housekeeping for Municipal Operations. **PIPE** There is a storm water citizen's committee meeting prior to township trustee meetings. Is open to the public, but not well-attended. Six people at committee meetings on average. Their role is to learn and educate their neighbors about MS4 system maintenance. Have not had a meeting this year. Need to ask Clerk for agenda from the last meeting.

Notes
Township has a newsletter. Newsletter goes out once or twice a year. Not sure when the last newsletter was sent out. NEED A COPY OF IT. May or may not have had a storm water-related article. The township does do an Adopt-a-Road clean up on Lorain County Pride Day (May each year). Focus on roads with major litter issues: O'Neil, Dutton and Lincoln Blvd. Students and an adult supervisor go out and pick out litter. Township sponsors a Night Out Against Crime. County provides litter control information at this event. Have an information booth with brochures as well as rolls of garbage bags and garbage pickers. This is all. So, they really haven't done the PIPE as expected.

Staff Education and Training			
Interview Questions	**Response**		
Staff trained to identify potential storm water pollution sources which would result in an illicit discharges? Frequency:	YES Has had some training, but not an illicit discharge session. However, road superintendent did demonstrate knowledge of issue and does look for illicit discharges on his daily drive thoughs.	NO	
Materials used to train staff:	Ohio EPA OCAPP.		
Applicable Documents		**Reviewed**	**Obtained**
Training materials		YES	YES

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Notes
On August 10, 2010, did discuss how to identify an illicit discharge at a road department staff meeting. Minutes only discuss "proper drainage", but Dave Underwood says that the discussion did include pollution prevention. Did review minutes but did not get copy.