Ohio | Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

RE: Storm Water
MS4
Lucas County & Others
Facility ID Number 2GQ000006

January 17, 2012

Mr. Brian Miller, PE, Drainage Engineer
Lucas County Engineers
One Government Center, Suite 870
Toledo, Ohio 43604

Dear Mr. Miller:

I apologize for the delay in this letter. As you know, Lucas County, Jerusalem Township, Springfield Township, Monclova Township, Spencer Township, Sylvania Township, Waterville Township, Washington Township, Village of Holland and the Village of Waterville (a.k.a. Lucas County & Others) operate as Co-Permittees under Ohio's General Storm Water National Pollutant Discharge Elimination System (NPDES) Permit for Small Municipal Separate Storm Sewers Systems (MS4s), also known as the Small MS4 Permit. Ohio EPA has completed an audit of Lucas County & Others' Storm Water Management Program (SWMP). The audit covered overall Storm Water Management Program (SWMP) implementation, but focused on Lucas County & Others' implementation of minimum control measure (MCM) #6: Pollution Prevention and Good Housekeeping for Municipal Operations. The SWMP is a requirement of Ohio Administrative Code 3745-39 and the Small MS4 Permit.

The audit consisted of: a January 11, 2011 interview with you; an inspection of the County's facilities at 2504 Detroit Avenue; as well as a review of the SWMP, all annual reports, and related ordinances/regulatory mechanisms. In performing this audit, Ohio EPA uses the Municipal Storm Water Program Evaluation Guide developed by the United States Environmental Protection Agency. Enclosed are the Municipal Storm Water Program Evaluation and Field Inspection Worksheets completed for Lucas County & Others. Some comments in these worksheets are specific to Lucas County. However, since one SWMP and one annual report have been submitted for the Co-Permittees, some comments concerning these two documents are applicable to each Co-Permittee. I recommend that each of the Co-Permittees review the enclosed report to insure that their jurisdiction addresses in the SWMP and in their daily implementation the outlined issues. We encourage the Co-Permittees to work together to remedy any SWMP violations and deficiencies.

Please review the enclosed 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. Key points (both violations and suggestions) in the Municipal Storm Water

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Program Evaluation and Field Inspection Worksheets have been highlighted in yellow. The following is a summary of the audit findings:

**Violations**:

- **Failure to provide a written agreement when relying on another entity to implement a BMP.** For example, the 2009 and 2010 Annual Reports state that Lucas SWCD is responsible for Construction Site Inspection & Runoff Control, but there is no MOU concerning this. The lack of MOU is a violation of Part III.C.3. of the Small MS4 NPDES Permit. 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 a Table of Organization (TO).** This is a violation of Part II.A.1.d. of the Small MS4 Permit. The permit requires that the SWMP include a TO, including a primary point of contact, that identifies how implementation across multiple positions, agencies and departments will occur. The person's name along with their position title must be listed. This did not occur for each BMP in the 2009 Annual Report. Examples are noted in the enclosed worksheets. In instances where each Co-Permittee is responsible for implementation within their jurisdiction, the SWMP must identify who is responsible from each Co-Permittee. This is a violation of Part II.A.1.d. of the Small MS4 NPDES Permit.
- **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 Permit. Some specific examples are listed in the enclosed Municipal Storm Water Program Evaluation Worksheets.
- **Failure to include information in the annual reports is a violation of Part IV. C. of the Small MS4 NPDES Permit.** Since information specific to the incorporated areas is not always included in the Annual Report, the coordination of reporting needs improvement. For example, there is no mention of Holland's or the Village of Waterville's Illicit Discharge ordinances or other ordinances in the 2010 Annual Report.
- **Failure to include a specific list of municipal operations that are impacted by the Lucas County & Others' operation and maintenance program to prevent or reduce pollutant runoff from municipal operations.** The 2009 Annual Report only named County facilities, not those of the other Co-Permittees. The 2010 Annual Report contained a general statement "all township and villages Road Department Garages". 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.
- **Failure to describe in the SWMP procedures for all of the areas of Municipal Operations that are required to be addressed by your Pollution Prevention/Good Housekeeping Program.** Overall, the SWMP is lacking in detail. Several areas of municipal operations were not addressed in the SWMP. These include, but were not limited to:

- **Failure to describe in the SWMP Lucas County & Others' 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. Material removed from catch basins was stockpiled at the County's facility on Monroe Street. Catch basin cleanings are a solid waste. They should be stored in a lidded dumpster and must be disposed at a landfill.
- **Failure to describe in the SWMP street sweeping procedures and the procedures for the disposal of waste.** This is a violation of Parts III.B.6.d.iii.1., 2., and 3. Street sweeping procedures, schedules, and procedures for waste disposal **must** be described in the SWMP, including information on material storage methods, testing protocols, and disposal locations. Lucas County & Others need to track the total amount of material that you have swept, which was not done for the 2009 & 2010 Annual Reports. During our interview, it was not known how street sweepings were disposed. Please provide information as to how the County's street sweepings are handled and where they are disposed in your response to this Audit.
- **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.** Other than mentioning the County's dispensing equipment calibration and the covered salt storage for the County and Townships (what about the incorporated areas?), 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 of the permit. The SWMP should describe controls such as calibration frequency, snow fighting, and - if applicable to Co-Permittees - snow disposal procedures. 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 Lucas County & Others' 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.

- **Failure to describe spill response procedures in the SWMP.** While Lucas County has spill response materials at their facilities, written procedures are not in place. This is a violation of Part III.B.3.i.iv. of the Small MS4 Permit.

- **Failure to fully develop, implement, and enforce a program addressing construction site runoff and post construction storm water management.** While Lucas County & Others have some elements in place, there are gaps:
    - **Ordinances/Regulatory Mechanisms:** Lucas County & Others is required to have an ordinance or other regulatory mechanism in place to require sediment and erosion controls, non-sediment pollutant controls, and post construction storm water management for new or redevelopment projects disturbing one acre or more. I did not see anything in the Subdivision Regulations that required non - sediment controls. If construction activities do not fall under the Subdivision Regulations, I did not see a regulatory mechanism that required the implementation of sediment and erosion controls, non-sediment controls, and post construction storm water management control. If a split is not proposed and there are no building/building alterations or zoning changes, it did not appear that anything triggers plan review, the implementation of sediment and erosion controls, or the implementation of non-sediment pollutant controls. Final building inspections are required prior to occupancy and include final grading for compliance with approved plans (Building Code Section 113.3.7.a.) , but other than that, I did not see the Building Codes mention storm water as it relates to sediment and erosion controls or requiring post construction storm water management for purposes of water quality. This is a violation of Parts III. B. 4.i. and 5.c. of the permit
    - **Plan Review:** More detailed information on the procedures and standards for construction and post construction storm water management (for water quality purposes) plan review must be included in the SWMP. This is a violation of Parts III.B.4.a.iv. and b.iv. of the permit. The current permit requires that all plans be reviewed prior to construction. While all plans are reviewed, based on our audit it does not appear that plan submittal is triggered for all required situations.
    - **Inspections:** The SWMP must include detailed information on site inspection procedures. Lucas County & Others do not appear to have a system to insure that: all construction projects are having an initial inspection, monthly follow-up inspections, inspections are documented, and site compliance is tracked. These are violations of Parts III.B.4.a.vi., III.B.4.b.vi., and III.4.c. of the permit.
    - **Enforcement:** If construction sites are out of compliance, Lucas County can deny occupancy permits. However, this is not an effective enforcement mechanism if the developer/contractor does not yet need an occupancy permit. The SWMP needs to include an official enforcement escalation plan or procedure, including procedures for when you will use certain sanctions. This is a violation of Part III.B.4.a.vi. Part III.B.4.b.ii., and Part III.B.4.b.vi. of the permit. The SWMP should describe how enforcement actions are tracked.

- **Ensuring long-term maintenance of post-construction BMPs.** Although Lucas County recently started to implement a process, the SWMP must describe it. This is a violation of Part III.B.5.e.vi. of the permit.

- **Failure of the Lucas County & Others to develop and implement a plan to detect and eliminate non-storm water discharges to its MS4.** This includes procedures for locating priority areas; procedures for tracing the source of an illicit discharge; including the specific techniques; procedures for removing the source; and procedures for program evaluation. This is a violation of Parts III.B. 3.e. and i.v. of the permit.
  - The existing regulations appear to cover only some types of illicit discharges (home sewage). They need to be reviewed along with the rest of the SWMP to insure all types of sources and discharge mechanisms are addressed.
  - The SWMP and the Annual Reports only mention the County's and the Health Department's enforcement abilities. Please describe the investigation procedures and enforcement process of the incorporated areas. The SWMP and regulatory mechanism must include or reference an enforcement escalation policy.
  - More detail is needed in the SWMP about illicit discharge investigation procedures, any evaluation criteria, and the illicit discharge elimination procedures. For Illicit Discharge response plans, a flow chart showing a clear set of procedures from initial response/detection to elimination is often useful.
  - Toledo-Lucas County Health Department data has identified an area of illicit discharges, potentially failed HSTS, in the Whiteford Road/Alexis Road area. Please provide a map of the storm sewer system of this area and where their outfalls enter a receiving stream. Please describe in your response letter what steps are being taken to further investigate and eliminate sources of illicit discharges. If similar situations (known or suspected discharging HSTS, either directly connected to the MS4 or due to infiltration from failed systems) exist, please provide the same information. This may include several of the critical sewer areas identified in Lucas County's 208 Plan.

**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. This could be made clearer in the SWMP by adding a statement to each BMP linking it to the POCs it is intended to address.
- **Lucas County & Others Public Information and Public Involvement programs during the first permit cycle were commendable,** including the Give Water a Hand (GWAH) campaign. Target audiences and target pollutants were noted in the SWMP and were addressed by the outreach program. Several different themes and mechanisms were used. For Public Education, BMP effectiveness was measured by pre- and post-campaign public surveys. The SWMP needs to be updated to reflect current Public Education and Involvement activities. PIPE program should be reassessed to identify if target audiences or pollutants need to be altered. Future efforts should focus on targeting emerging water quality issues and/or on re-enforcing existing messages.
- Please be sure that the MS4 map denotes those HSTS that discharge to the MS4 (as opposed to all HSTS). The map must be completed by June 17, 2014.
- 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 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.
- While guidance and training is provided to staff on Best Management Practices associated with municipal operations, some of the material is too general (e.g. 'dispose of waste properly'). Guidance material needs to be more specific (exactly what wastes are generated and what is considered proper disposal for that type of waste).
- A Storm Water Pollution Prevention Plan (SWP3) needed to be developed for yard waste collection/composting areas, maintenance yards, and vehicle maintenance facilities. Please reference Ohio EPA General Storm Water NPDES Permit for Industrial Activities #OHR000004 for more information on the contents of a SWP3. Please be aware that a documented inspection must be conducted at least once per year once a SWP3 is developed for these facilities. Lucas County's inspection checklist is a good administrative list, but it needed more detail, such as observations of the conditions at the facility and of the BMPs. You were unsure if Lucas County operated an impound lot. Please provide information as to whether the County operates an Impound Lot with your reply to this audit.

- **King Road Landfill-** This facility does not have an NPDES permit for storm water discharges associated with industrial activities. Ohio Administrative Code 3745-39-04 requires an NPDES permit for storm water discharges from landfills, land application sites, and open dumps that have received any industrial wastes. In order to advise Lucas County on what type of NPDES permit may be necessary, please provide a map of the location of the outfalls for any onsite drainageways and for the drainageways that border the landfill on the east (along King Road), the south, and the west. Please include in your reply any available information on the water quality in the drainageways discharging from this site.
- Lucas County & Others 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.

Please review my comments and provide me with a response letter indicating the actions you have taken or propose to address the above issues. Your response must include the dates, either actual or proposed, for the completion of the actions. Lucas County & Other's **written 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 the 2011 Annual Report on April 1, 2012.

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

Sincerely,

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

/jlm
Enclosure: Municipal Storm Water Program Evaluation and Field Inspection Worksheets
ec: Jeff Grabarkiewicz, Lucas SWCD
E. Camille Yancey, Esquire Of Counsel, Ohio Environmental Council
Jeff Fyffe, DSW-CO
Naajy Abdullah, DSW-NWDO
Inspection Tracking

# MUNICIPAL STORM WATER PROGRAM EVALUATION

## Program Management Component Worksheet

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|---|
| **Date of Evaluation**<br>1/11/2011 |
| **Evaluator Name, Title**<br>Lynette Hablitzel, Ohio EPA - NWDO |
| **MS4 Permittee & Facility Permit No.**<br>Lucas County & Others<br>2GQ00006 |
| **Date Issued Permit Coverage**<br>Initially Granted: 3/28/07<br>Renewed: 6/19/2009 |

| Staff Interviewed | | |
|---|---|---|
| **Name** | **Department/Agency** | **Phone Number/Email** |
| Brian Miller, P.E. | Drainage Engineer,<br>Lucas County Engineer's Office | 419-213-4540<br>bwmiller@co.lucas.oh.us |
| | | |
| | | |

| Comprehensive Storm water Management Planning<br>SWMP Planning | | |
|---|---|---|
| **Interview Questions** | **Response** | |
| Is SWMP Plan available?<br>Most recent version dated: | Yes.<br>2003. Any changes were noted in Annual Reports. | |
| If multiple co-permittees, does each have a separate SWMP document? | No. | |
| Is there an area wide SWMP, if multiple co-permittees? | Yes. | |
| If the permittee is a municipality, does the comprehensive plan include storm water elements? If so, what types?<br>• Imperviousness<br>• Open space<br>• Water body protection | N/A | |
| Were stakeholders included in the planning process? | Yes. | |
| **Applicable Documents** | **Reviewed** | **Obtained** |
| SWMP Plan | Yes. | On file. |

# MUNICIPAL STORM WATER PROGRAM EVALUATION

| Comprehensive Storm water Management Planning<br>Intergovernmental, Agency, Departmental Coordination | | |
|---|---|---|
| **Interview Questions** | **Response** | |
| If multiple co-permittees, is there an "umbrella group" to coordinate activities?<br><br>Do just permittees meet outside of SWC to coordinate efforts ? Routinely? Schedule? | Brian Miller acts as a coordinator between the Co-Permittees. Co-Permittees are members of TMACOG's Storm Water Coalition (SWC), which tends to coordinate certain training and education events for regulated MS4s. SWC meets every other month on the third Thursday. There is not a regularly scheduled meeting outside of SWC. | |
| Are roles and responsibilities for multiple co-permittees established? | Yes. Each Co-Permittee is responsible for implementation. SWC serves as advisory role. | |
| How are in-house departments coordinated? | By each individual jurisdiction. | |
| Are outside groups used to implement the SWMP?<br><br>Name of Group(s): | Yes.<br><br>SWC, Keep Toledo-Lucas County Beautiful (KTLCB), TMACOG, Toledo-Lucas County Health Department, Lucas SWCD, Lucas County Solid Waste District. | |
| Are there MOUs between co-permittees and outside agencies? | For some BMPs, but not all. See Notes below. | |
| **Applicable Documents** | **Reviewed** | **Obtained** |
| MOUs or other agreements | Yes. | MOUs submitted July 18, 2005, on file. |
| Meeting schedules for in-house or inter-agency task forces or committees | Yes, SWC. | See SWC file. |

| Comprehensive Storm water Management Planning<br>Staff Inventory & Organization | |
|---|---|
| **Interview Questions** | **Response** |

# MUNICIPAL STORM WATER PROGRAM EVALUATION

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|---|---|---|
| Has a Table of Organization (TO) been developed? | Yes. Information was not initially provided in TO format, but that was corrected in 2010 Annual Report. | |
| Does it include:<br>A primary contact? | Primary contact (Brian Miller) is person listed as contact in AR. | |
| All other persons responsible for implementing or coordinating the BMPs? Have roles and responsibilities been assigned? | No. See Notes below. | |
| Their title and contact information? | Sometimes is provided. See the Notes section below. | |
| Does the TO identify how implementation across multiple position/agencies/departments will occur? | No. It does not show organizational structure of the group and the relation of one position to another. | |
| **Applicable Documents** | **Reviewed** | **Obtained** |
| Storm water program staff lists, responsible parties, contact names, organizational charts | Yes. | Information reviewed is in 2008, 2009, and 2010 Annual Reports. |

| Notes |
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| **Comprehensive SWMP** – The SWMP needs to be revised and updated. As program changes are made, it is important that these changes be included in the actual SWMP. For instance, the SWMP mentions the Villages of Ottawa Hills and Harbor View but they are not currently Co-Permittees. 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. When updating the SWMP, please check the SWMP to ensure clarity. With an umbrella SWMP for all Co-Permittees, the SWMP must be clear which of the Co-Permittees are committed to performing the activity.<br><br>**Written Agreements** – Lucas County & Others must provide MOUs when they are relying on another entity to perform a BMP. For example, the 2009 and 2010 Annual Reports state that Lucas SWCD is responsible for Construction Site Inspection & Runoff Control, but there is no MOU concerning this. The lack of MOU 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. The MOU should stipulate the activities being performed, a timeframe for notifying Lucas County & Others should the entity decide not to implement the program/BMP. Please keep in mind that Lucas County & Others is obligated to implement the BMP in the event the other entity does not.<br><br>**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. The person's name along with their position title must be listed. This did not occur for each BMP in the 2009 |

# MUNICIPAL STORM WATER PROGRAM EVALUATION

Annual Report. For instance, under Public Education, Storm Drain Stenciling is done by individual jurisdictions. No names, positions, or contact info was provided. In the 2010 Annual Report , the storm sewer cleaning and street sweeping were done by individual jurisdictions but names and contact information were absent from the TO. In instances where each Co-Permittee is responsible for implementation within their jurisdiction, the SWMP must identify who is responsible from each Co-Permittee. This is a violation of Part II.A.1.d. of the Small MS4 NPDES Permit #OHQ000002.

| Comprehensive Storm water Management Planning<br>Performance Standards or Goals | | |
|---|---|---|
| **Interview Questions** | **Response** | |
| Have measurable goals or standards been developed for each SWMP program component? | Not for each BMP. Sometimes goals were not quantifiable. See Notes below. | |
| Do the goals address water quality impact or effectiveness? How? | Not always. See Notes below. | |
| **Applicable Documents** | **Reviewed** | **Obtained** |
| Performance standards, measurable goals, schedule | SWMP & Annual Reports. | Copy in file. |

| Comprehensive Storm water Management Planning<br>Prioritization of Resources | |
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| **Interview Questions** | **Response** |
| Have pollutants of concern (POC) been established? If yes, based on what?<br>• 303(d) list?<br>• TMDLs?<br>• Predominant land uses?<br>• Existing watershed planning efforts? | Yes. SWMP identifies fecal coliform, restaurant grease, road salt, oil & suspended solids on page 6. Brian Miller stated POCs are road salt, oil and suspended solids.<br><br>Basis: SWMP was unclear on the basis for the decision. Brian Miller indicated it was based on previous Ten Mile Creek and Swan Creek Studies. |
| Have POC-specific strategies been developed in the SWMP? | Yes, but this could be made clearer in the SWMP by adding a statement to each BMP linking it to the POCs it is intended to address. |
| How does the permittee decide program implementation priorities for resource allocation? | They don't have a process. |

| Assessment and Evaluation | |
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| **Interview Questions** | **Response** |
| Is the SWMP regularly measured against goals or standards? | Not always. See Notes below. |
| Have load reduction goals been established or assessed? | No. |

# MUNICIPAL STORM WATER PROGRAM EVALUATION

| Assessment and Evaluation | |
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| **Interview Questions** | **Response** |
| Have other types of improvements been assessed?<br>• Riparian habitat?<br>• Stream corridor?<br>• Aquatic habitat?<br>• Groundwater | Lucas County has riparian setback requirements in their Floodplain regulations, but have not formally assessed the progress of the measure. |

**Notes**

**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. Lucas County & Others need 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 Lucas County & Others will evaluate the success of the program. For example, under the Construction Program in the SWMP, "keeping track of the number of site plans inspected for Erosion and Sediment Control Plan" and "what percent of those plan inspected were in compliance" were listed as a goal. While these are program elements that can be measured, quantifiable targets were not given. Another example, under Post Construction Runoff Control, keeping track of the number of "As-Built" plan submitted is listed as a goal. The SWMP did not include information as to what was the quantifiable target.

Please review the SWMP to insure there are measurable goals for each BMP and revise the SWMP accordingly. Keep in mind that final measurable goals should, when possible, demonstrate results that relate to an environmental benefit. They are BMP 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, a measured level of public participation; 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.

**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.

**Public Involvement and Public Education (PIPE)**- Lucas County & Others implemented a good PIPE program during the first permit cycle, including the Give Water a Hand (GWAH) campaign. Target audiences and target pollutants were noted in the SWMP and were addressed by the outreach program. Several different themes and mechanisms were used. For Public Education, BMP effectiveness was measured by pre- and post public surveys. The SWMP needs to be updated to reflect current Public Education and Involvement activities. PIPE program should be reassessed to identify if target audiences or pollutants need to be altered. Future efforts should focus on targeting emerging water quality issues and/or on re-enforcing existing messages.

| Data Collection and Reporting | |
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| **Interview Questions** | **Response** |

# MUNICIPAL STORM WATER PROGRAM EVALUATION

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| How are data or information from outside groups obtained? | Brian Miller calls outside groups, departments and Co-Permittees. | |
| Have internal reporting deadlines been established? | Yes. Based on Annual Report deadline in permit. Brian Miller calls departments and Co-Permittees by February1st in order to get data by March 1 | |
| **Applicable Documents** | **Reviewed** | **Obtained** |
| Reporting or assessment procedures | None written. | None written. |

| Notes |
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| Since information specific to the incorporated areas is not always included in the Annual Report, the coordination of reporting needs improvement. For example, there is no mention of Holland's or the Village of Waterville's Illicit Discharge ordinances or other ordinances in the 2010 Annual Report. Failure to include information in the annual reports is a violation of Part IV. C. of the Small MS4 NPDES Permit #OHQ000002. |

# MUNICIPAL STORM WATER PROGRAM EVALUATION

## MS4 Maintenance Component Worksheet

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| **Date of Evaluation**<br>1/11/2011 |
| **Evaluator Name, Title**<br>Lynette Hablitzel, Ohio EPA – NWDO |
| **MS4 Permittee & Facility Permit No.**<br>Lucas County & Others<br>2GQ00006<br>Initially Granted: 3/28/07<br>Renewed: 6/19/2009 |

**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** |
| Brian Miller, P.E. | Drainage Engineer,<br>Lucas County Engineer's Office | 419-213-4540<br>bwmiller@co.lucas.oh.us |
| Greg Wimberly | Acting Road Superintendent,<br>Lucas County | 419- 893-2232 |
| | | |

| MS4 Mapping | | |
|---|---|---|
| **Interview Questions** | **Response** | |
| Outfalls and receiving waters mapped (including names)? | Yes. | |
| Catch basins? | Yes. | |
| Pipes, ditches, other conduits? | Yes. | |
| Home Sewage Treatment Systems (HSTS)<br>**Note:** only requires those that discharge to MS4 | Yes, but see Notes below. | |
| Flood Control Facilities? | Yes. | |
| Public storm water facilities (BMPs)? | Yes. | |
| Private storm water facilities (BMPs)? | Yes. | |
| **Applicable Documents** | **Reviewed** | **Obtained** |
| Map(s) of MS4 system | Yes. | No. |

| Notes |
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| The County maintains a GIS map of their MS4. It includes a feature of categorizing the mapped ditches as small, medium, etc., based on TMACOG's setback standards. Post Construction BMPs are mapped with a place locator and a reference to the specific facility's file.<br><br>**MS4 Mapping** - The Small MS4 NPDES General Permit 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. The map is required to be completed by June 19, 2014. It appears that Lucas County & Others have done most of this work. Please |

| Notes |
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| be sure that a mechanism is in place to map post construction BMPs for incorporated Co-Permittees such as Holland and the Village of Waterville.<br><br>**HSTS-** HSTS mapping was based on Health Department records and included all HSTS. Lucas County & Others are only required to map those HSTS **discharging** to the MS4. The map of those HSTS discharging into the MS4 was to be completed by 2008. The current map layer needs to contain some distinction between discharging and non-discharging HSTSs. Lucas County & Others need to make sure a system is in place to update HSTS on the map whenever systems are found to be the source of illicit discharges, new discharging HSTSs are installed, or HSTSs are eliminated. |

| Catch Basin Cleaning | |
|---|---|
| **Interview Question** | **Response** |
| Schedule established for inspections and cleaning? | Nothing in writing. Cleaning is performed as needed. Certain areas are routinely inspected. Inspections are performed as time allows. |
| Is cleaning and maintenance of catch basin (CB) tracked: | How many CBs are cleaned is tracked. The number of CBs cleaned in the 2009 Annual Report is a total of all the Co-Permittees. Some jurisdictions track hours. Then, use a formula to determine the quantity of catch basins cleaned. Exactly which catch basins are cleaned is not tracked by County. It may be tracked by the townships. For Lucas County, Brian Miller gives a To Do list. He didn't know if that was tracked. |
| How are spoils materials disposed of?<br><br>Catch basin cleanings are a solid waste. They should be stored in a lidded dumpster and **must be disposed at a landfill.** | For Lucas County, the material is placed on a pad at the municipal yard. This area drains to the sanitary sewer. The dewatered material is then stockpiled.<br><br>The 2009 & 2010 Annual Reports refer to Lucas Co. Solid Waste Annual Report for the quantity. However, per Ohio EPA's DSWIM: The annual report submitted by the solid waste district documents recycling activity, which would include yard waste. The annual report provides information on recycling activities within the solid waste management district (in this case Lucas County), but not disposal activities. DSIWM tracks solid waste handled through facilities in a separate report, but does not have a breakdown of the waste types, such as catch basin material. The Solid Waste Annual Report should not be referenced. |
| Are storm drain pipes inspected?<br><br>Proactive or only in response to blockage event? | The County has started inspecting outfalls. Otherwise pipes are inspected in response to blockage. Do not have a camera to check lines. |

# MUNICIPAL STORM WATER PROGRAM EVALUATION

| Applicable Documents | Reviewed | Obtained |
|---|---|---|
| Tracking logs | No. | No. |
| BMP guidance | None. | None. |

| Notes |
|---|
| **Catch Basin Cleaning** –The activity conducted appears to be more about maintaining drainage than performing maintenance to address the amount of pollutants discharged. 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. Not having this described in the SWMP is a violation of Parts III.B.6.d.iii.1.and 3.<br><br>**Ditch Maintenance** – Approximately 8 miles of ditches in the county are under maintenance. This is not performed in Phase II (permitted) area. |

| Storm water Management Facilities Operation and Maintenance | | |
|---|---|---|
| **Interview Questions** | **Response** | |
| Public facilities inspected?<br>Frequency: | Yes. Subdivision ponds are 1/year. County BMPs on roads 2/year. | |
| Private facilities inspected?<br><br>Frequency: | No. Should be yearly in the future. | |
| Checklist used for inspections? | No. | |
| Maintenance standards and procedures established? | No. The SWMP must describe your maintenance standards and procedures. | |
| Data evaluated to target maintenance resources? | No. | |
| **Applicable Documents** | **Reviewed** | **Obtained** |
| Inspection checklist | None. | None. |

| Road Maintenance | |
|---|---|
| **Interview Questions** | **Response** |
| Streets regularly swept?<br><br>Frequency: | Yes. Contracted out. Last year it was Perfect Sweep. At the time of the audit, this year's contractor had not been finalized.<br><br>2009 Annual Report states 2/year minimum, sometimes 3- 5 times/year. When asked, Brian Miller said this frequency applied to both township and county areas. The county sweeps curbed and non curbed roads. |

# MUNICIPAL STORM WATER PROGRAM EVALUATION

| Road Maintenance | |
|---|---|
| **Interview Questions** | **Response** |
| How many road miles does the MS4 have? | Unknown how many miles are inside the UA. |
| Frequency based on water quality factors (e.g. proximity to streams)? | No. |
| How are spoils disposed of? | Unknown. Street sweepings are solid waste and must be managed as such. Please provide information as to how the County's street sweeping are handled and where they are disposed with your response to this Audit. |
| Does the community collect road kill?<br><br>What do they do with the carcasses?<br><br>**NOTE:** MS4s are not obligated to collect road kill, but if they do, can be disposed in dumpsters or taken to a licensed, Class II composting facility. Cannot have pile of carcasses stacked up. This is open dumping. | Sometimes.<br><br>Small animals are pushed off the roadway. Larger animals will be buried onsite (the nearest location where property owner agrees). Deer may be taken to Culbertson Farm (Angola Road) to feed animals. |
| Does the community have a leaf collection program?<br><br>What do they do with the collected leaves? Collected wood?<br><br>**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 leachate must be prevented from discharging. | Townships have leaf collection. Material is taken to Clean Wood Recycling on Bancroft. Wood debris they chip and take to Clean Wood. |
| BMPs used during road maintenance activities?<br><br>Describe types of road maintenance conducted by community staff and the BMPs used | Yes. Covered salt storage. Use salt brine to lower salt use. Use inlet protection. |
| BMP guidance available to field staff? | Yes. Give Water A Hand (GWAH) Brochures: BMPs for Businesses & Material Storage Facilities. Storm Water Pollution Prevention BMP Guidebook by Excel Visual LLP (@ 2006). Some of this guidance is generic, i.e. 'dispose of wastes properly'. BMP guidance for staff should be more activity specific (what wastes are generated and what is considered proper disposal for that type of waste?) |
| Deicers used by MS4? | Yes. |
| Type and amount of deicer tracked? | Yes. Subtract end of season quantity from beginning of season quantity. Quantity of salt |

# MUNICIPAL STORM WATER PROGRAM EVALUATION

| Road Maintenance | |
|---|---|
| **Interview Questions** | **Response** |
| What measures are being taken to minimize the application of deicers? | reported in the 2009 Annual Report is a total for all Co-Permittees.<br><br>Per 2009 & 2010 Annual Report: County uses hydraulic measuring devices. Trucks calibrated every year. Brian Miller was not sure if other Co-Permittees have this. |
| Does your community operate a snow stockpile yard to store snow that has been removed from community streets and parking lots?<br><br>If YES, location of the yards:<br><br>Has your community considered implementing best management practices to control the discharge of pollutants from snowmelt associated with snow storage yards?<br><br>If YES, what BMPs have you implemented? | Lucas County does not. Brian Milller was unsure about Co-Permittees.<br><br>N/A |

| Applicable Documents | Reviewed | Obtained |
|---|---|---|
| BMP guidance | GWAH Brochures | Available on-line. |
| Street sweeping records | No. | No. |
| Deicer application records | No. | No. |

| 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, tracking sweeping location, frequency, and amount of material 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. This was not done for 2009 and 2010 Annual Reports. 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 of the permit. Street sweepings are solid waste and must be managed as such. Please provide information as to how the County's street sweeping are handled and where they are disposed with your response to this Audit.<br><br>**Road Deicing-** Although the County 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 the County's dispensing equipment calibration and the covered salt storage for the County and Townships (what about the incorporated areas?), 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 of the permit. The SWMP should describe controls such as calibration frequency, snow fighting, and - if applicable to Co-Permittees - snow disposal procedures. |

# MUNICIPAL STORM WATER PROGRAM EVALUATION

| Flood Management | | |
|---|---|---|
| **Interview Questions** | **Response** | |
| Inventory of flood management structures completed? | No. | |
| Structures been assessed for storm water retrofit? | Some. There are a couple that Lucas County operates that are meter down points. | |
| New structures include water quality considerations? | Yes. | |
| **Applicable Documents** | **Reviewed** | **Obtained** |
| Inventory | No. | No. |

| Notes |
|---|
| **Flood Management:** Other than the requirement for NPDES permit for new projects, 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 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)? | Not in SWMP. 2009 Annual Report only named County facilities, not those of the other Co-Permittees. 2010 Annual Report includes "all township and villages Road Department Garages". 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**<br>*These need their own NPDES storm water permit for industrial activities or must submit a No Exposure Certification if there is a discharge of runoff from these operations:* | **Response** | **SWP3 Developed?** |
| • Landfills Type: See Notes below | King Road. Inactive. | No. |
| • Solid Waste Transfer Stations | None. | N/A since do not operate. |
| • Airports | None. | N/A since do not operate. |
| • Shipping Ports | None. | N/A since do not operate. |
| • Steam Electric Power Plants | None. | N/A since do not operate. |
| • Wastewater Treatment Plants ≥ 1 MGD or with a pretreatment program | Yes. 22.5 MGD. Located at 5758 North River Road, which appears to be in the UA. NPDES permit No. 2PK00000. NPDES permit recently renewed (6/27/2011) and now includes Parts IV, V, and VI (storm water language). Historically, the facility had not submitted a No Exposure Certification form and did not have coverage for storm water discharges under the NPDES Industrial General Permit. | |

# MUNICIPAL STORM WATER PROGRAM EVALUATION

| Facilities Operation & Maintenance | |
|---|---|
| **Interview Questions** | **Response** |
| ***These do not need their own NPDES permit, but do need SWP3, if community operates:*** | **Response** **SWP3 Developed?** |
| • Impound Lots | Brain Miller was unsure if Lucas County operated one. Please provide information as to whether the County operates an Impound Lot with your reply to this Audit. |
| • Composting Operations<br>✓ No discharge of leachate permitted | None. No SWP3 required. |
| • Leaf Collection Yards<br>✓ No discharge of leachate permitted | None. No SWP3 required. |
| • Maintenance Yards<br>➢ How many do they operate? __1___<br>➢ List facility names/locations:<br>**Municipal buildings and facilities located at:** | 2504 S. Detroit Ave., Maumee. Need SWP3-See Notes below. |
| • Bus Terminals | None. No SWP3 required. |
| • Vehicle Maintenance Garages<br>➢ How many do they operate? _3___<br>➢ List facility name/locations:<br>Same as above | One Downtown maintenance garage – in CSO area. No SWP3 required.<br>One at 2504 S. Detroit Ave., Maumee, and one at Sanitary Engineer's Office, 1111 S. McCord Road, Holland. Both need SWP3 – see Notes below. Future location will be next to Sanitary Engineer's Office. |
| ***These are municipal operations for which the MS4 must adopt best management practices, but do not require a formal SWP3:*** | **Response** |
| • Parks and Open Space (include Cemeteries)<br>➢ How many in UA? __1___<br>➢ List facility names/locations: | Most parks belong to Metroparks. No Lucas County cemetery. All Townships have a cemetery. Lucas County Recreation Center, 2901 Key Street, Maumee, is leased. The facility includes walking trail, basketball/tennis/volleyball/shuffleboard courts, and soccer fields. |
| • Public Parking Lots (other than municipal buildings, parks, etc.)<br>➢ How many do they operate? _0__<br>➢ List facility name/locations: | Lucas County Recreation Center, 2901 Key Street, Maumee. Building is leased. |

# MUNICIPAL STORM WATER PROGRAM EVALUATION

| Facilities Operation & Maintenance | |
|---|---|
| **Interview Questions** | **Response** |
| Facilities inspected?<br><br>Frequency: | Lucas County facilities: Yes. County facilities that are downtown: No (but that is a combined sewer area).<br><br>Was conducted once during the permit cycle (March 19, 2010). When you develop the SWP3, please determine an appropriate storm water inspection schedule. Once per month is a reasonable frequency. The minimum required is once annually. |
| Checklist used? | Yes, for Maintenance Garage. See Notes below. |
| Staff which perform the inspections (department or agency: | Brian Miller, Lucas County Engineer's Office, has performed inspections but not routinely. Jim Shaw, Lucas County Sanitary Engineer, responsible for Sanitary Engineer's facility. |
| Is there a designated storm water contact person for each facility? | Yes. |
| 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?: | Brian Miller was unsure. |
| Parking lots owned/operated by the permittee swept? Frequency?<br><br>Do you operate any asphalt parking lots?<br><br>Do you use any coal tar-based sealants on those asphalt parking lots? | No.<br><br>Yes.<br><br>Brian Miller doesn't believe the Rec. Center (which is leased) has been crack sealed. Resurfaced in early 80s. See Notes below. |
| Do you have any combined sewer systems?<br><br>If yes, do you have any combined sewer overflows?<br>➢ How many? _____<br>➢ Do you track frequency and volume?<br><br>Are you aware of any illicit cross connections between your sanitary sewer and MS4? | There is an overflow at the WWTP. Otherwise, there are no combined sewer systems owned or operated by Lucas County. Some Lucas County buildings (such as downtown Toledo locations) are served by the City of Toledo's Combined Sewer System.<br>No. HSTS issue by Whiteford Road. |

# MUNICIPAL STORM WATER PROGRAM EVALUATION

| Facilities Operation & Maintenance | |
|---|---|
| **Interview Questions** | **Response** |
| If so, what is your plan to eliminate this illicit discharge? | See Notes below. |
| Have you investigated the extent of infiltration and inflow into storm sewer system (this is a diffuse source as opposed to a direct discharge)?<br><br>What methods have been used to conduct this investigation?<br><br>What are your plans to repair and eliminate this source of illicit discharge? | There appears to be a source of bacteria, likely HSTS (unsewered areas/sandy soils) off Whiteford Road up near Alexis.<br><br>Health Department has investigated.<br><br>See Notes below. |
| Sanitary sewer systems/building drains at municipal facilities evaluated to determine storm sewer cross-connections or overflow locations?<br><br>How (video camera, dye test,etc.)? | Yes.<br><br>"Smell test" (odor), observations when working on storm sewer, reviewed building plans and sewer drawings. |
| Spill and cleanup procedures in place? | Yes, but not documented. See Notes. |

| Applicable Documents | Reviewed | Obtained |
|---|---|---|
| Facility inventory | None. | None. |
| Facility SWPPP | Not developed. | Not developed. |

| Notes |
|---|
| **King Road Landfill:** 104-acre site located at 3535 King Road. Waste disposal occurred from 1954 to 1976. A waste transfer station operated near the main gate from 1980 through 1991. A site investigation by Lucas County, which owns the property, found elevated levels of arsenic and ammonia on and off the site. Ohio EPA reviewed several alternatives to remediate the landfill and prevent off-site migration of contaminants. In January 2011, Ohio EPA held a hearing on recommended remediation plan (a.k.a. preferred plan). The plan recommends adding more soil cover to the top of the landfill to ensure slope stability and reduce storm water infiltration; adding vegetative cover; maintaining access controls to prevent public contact with restricted areas; removing ditch sediment "hot spots"; establishing a "no well zone"; and ensuring all local residences and businesses in the zone are connected to a municipal drinking water supply. In addition, existing methane gas monitoring and leachate collection would be continued. However, according to Ohio EPA DERR staff, ditches that border the perimeter of the landfill do not all drain into the leachate collection system. This facility does not have NPDES permit for storm water discharges associated with industrial activities. Ohio Administrative Code 3745-39-04 requires an NPDES permit for storm water discharges from landfills, land application sites, and open dumps that have received any industrial wastes. In order to advise Lucas County on what type of NPDES permit may be necessary, please provide a map of the location of the outfalls for the any onsite drainageways and for the drainageways that border the landfill on the east (along King Road), the south, and the west. Please include in your reply any available information on the water quality in the drainageways discharging from this site.<br><br>**SWP3** - The Ohio EPA General Storm Water NPDES Permit for Small MS4s #OHQ000002 requires the Lucas County & Others to develop and implement a SWP3 for the vehicle maintenance facilities and the maintenance facilities by June 19, 2011. The above facilities must be inspected at least once per year and |

| Notes |
|---|
| a record of the inspection and its findings must be kept with the SWP3. If the inspection reveals deficiencies in the SWP3 or BMPs that are ineffective, the SWP3 must be revised to correct the problems. For facilities that require a formal SWP3, an inspection checklist, customized to that facility, must be included in the plan. The current checklist that was used is a good administrative list, but needs more detail as to observations of the conditions at the facility and of the BMPs. For example, while it asks if storm drains are labeled, it does not prompt the inspector to include observations of the drains themselves (Were they clean? Any discoloration/odor/suds?). It should also document weather conditions at the time of inspection. Was there runoff? Observations concerning any discharge of pollutants? Any signs of staining or discoloration on the pavement? Dead or stressed vegetation? etc. The SWP3 should also identify who is responsible for facility inspections as well as a stormwater contact person for the facility. Please reference Ohio EPA General Storm Water NPDES Permit for Industrial Activities #OHR000004, ***Part IV. D.2.a.1***<br><br>**Municipal Facilities Operation and Maintenance -** The SWMP does not describe Lucas County & Others 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, It does mention County and Township salt storage but not the incorporated areas'. This lack of information is a violation of Part III.B. 6.d.iii.1., 2., and 3.<br><br>**Asphalt Parking Lots:** Some MS4s have banned the use of coal tar-based sealants in their communities. Research from the University of New Hampshire Storm water 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.<br><br>**Illicit Discharges-** To my knowledge the Whiteford Road possible HSTS discharge issue remains unresolved. Please provide me with a plan of action to investigate the source and eliminate this illicit discharge with your response to this audit. Your submittal should include a map of the effected MS4 outfalls and municipal separate storm sewer system. If the matter has been resolved, please indicate how it was resolved and the date the illicit discharge was eliminated.<br><br>**Spill Response-** While Lucas County has spill response materials at their facility, written procedures are not in place. Spill response procedures are an integral part of the Lucas County & Others' Illicit Discharge Detection and Elimination and Pollution Prevention for Municipal Operations Minimum Control Measures. 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. |
| Integrated Pest Management (IPM) practices used? | No. See Notes. |
| Storage location of pesticides, herbicides, and fertilizers: | Inside. |
| BMPs used during application: | Brian Miller was not sure. See Notes. |

| | |
|---|---|
| | |
| Fertilizer/pesticide application plan utilized? | No. |

| Applicable Documents | Reviewed | Obtained |
|---|---|---|
| Fertilizer/pesticide application plan | None. | None. |

**Notes**

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

**BMPs for Pesticide & Fertilizer Application** - Pesticide and fertilizers should not be applied when the forecast calls for rain. The product label will provide guidance on application rates and methods. Do not exceed the manufacturer's recommendations. In addition, crews should be trained to avoid overspray and to implement dry clean-up methods should spills occur. Material may not be washed into the storm sewer system. Storm drains near application sites may be covered to prevent overspray or spills from entering the MS4.

Integrated Pest Management (IPM) is an effective and environmentally sensitive approach to pest management. IPM programs use current and comprehensive information on the life cycles of pests and their interaction with the environment. It is a common sense plan that uses preventative actions, sets action levels for pesticide application, and includes pest monitoring and identification to target pesticide usage. For additional information, please see: http://www.epa.gov/pesticides/factsheets/ipm.htm.

**Standards, BMPs, & Outreach**

| Interview Questions | Response |
|---|---|
| BMP technical guidance document available to maintenance staff? | No. |
| MS4 use contractual staff to complete MS4 maintenance activities? | Yes. Street sweeping and resurfacing are contracted out. |
| BMP guidance materials provided to contracted staff? | No. |
| Requirement to consider storm water impacts and utilize appropriate BMPs in contracts? | Not specifically, other than those listed in ODOT regulations for construction activities. |

| Applicable Documents | Reviewed | Obtained |
|---|---|---|
| BMP manual or guidance document | None. | None. |
| Contract language for MS4 operation and maintenance activities | No. | No. |

**Notes**

**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 Lucas County & Others' 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 proposals 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 Permittees. Periodic inspection of contractor operations in your community is also suggested.

# MUNICIPAL STORM WATER PROGRAM EVALUATION

| Staff Education and Training | |
|---|---|
| **Interview Questions** | **Response** |
| Staff trained to identify illicit discharges? | Yes. Shown storm water video from Excal Visual. |
| Materials used to train staff: | Brian Miller says that material from SWC is also used. |

| Applicable Documents | Reviewed | Obtained |
|---|---|---|
| Training materials | No. | No. |

**Notes**

Everyone at maintenance garage trained. Sanitary Engineer's office is to be trained. In annual reports, the training numbers reported are a composite of all jurisdictions.

**Staff Training and Education** - The permit requires the County 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 the Annual Reports state that employees have received training on various topics, the County 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. 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.

| Construction Projects | |
|---|---|
| **Interview Questions** | **Response** |
| Construction Ordinance (or similar mechanism) in place?<br>Section of Code/Mechanism:<br>Date passed: | Lucas County: Yes. Contained in County Building regulations and Subdivision regulations. Subdivision Regulations Section 703 requires that sediment & erosion controls: 1) follow the specifications of ODNR's Rainwater & Land Development Manual, & 2) comply with the requirements of the Lucas County Engineer, SWCD, and Ohio EPA. The latest version of the Subdivision regulations are dated September 2008. The County Storm Water Drainage Design Standards (dated 2004, effective 1/1/2005), Paragraph X, states that the "requirements for NPDES permit shall be followed when permit required." Building Code Section 111.7.2 (dated 2006) states the (building) permit holder is responsible for obtaining an NPDES permit when required. |
| Does ordinance address all earth disturbing activities?<br>Address all projects affecting 1 acre or more?<br>Address non sediment pollutants?<br>Equivalent with technical requirements in CGP (OHC000003)? | No. See Notes.<br>No. See Notes.<br>No. See Notes.<br>No. See Notes. |
| Are all plans reviewed? | If there is no structure or no zoning change, then the plan review requirement is not triggered. |
| Are all construction sites initially inspected?<br>Follow-up inspections conducted monthly?<br>If not, are there written inspection prioritization procedures? | Yes, as far as Brian Miller knows. County doesn't always know when projects break ground in order to initiate inspections. Townships are not inspecting. Relying on SWCD and Tom Brinkman (Lucas County Engineer's Office). There is no tracking mechanism. No set inspection form. No written procedures. |
| MS4-Owned Projects designed in-house or contracted? | Both. |
| Designers/reviewers trained in storm water BMP implementation? | Yes. |
| Checklist used during the design and/or review of public/private construction projects? | Brian Miller indicated "Yes" for the County. |
| Are projects greater than one acre covered a general construction permit (has an NOI been submitted)? | Yes. |
| If contracted planners and engineers are used for the design of MS4-owned projects, does the contract | Yes, for road design. Only per NPDES requirements. |

| Construction Projects | |
|---|---|
| **Interview Questions** | **Response** |
| language specify that storm water BMPs be incorporated into the design? | |
| In-house inspection staff inspect projects? If so, which department? | Yes. Lucas County Engineer's Office (Tom Brinkman). Lucas County Sanitary Engineer's Office (for their projects). Jeff Grabarkiewicz (Lucas SWCD) does some. Tom is responsible for verifying that the project is at approved grades (elevations). He can tell them to fix issues. If they do not comply, Lucas County can deny occupancy permit. However, this is not an effective enforcement mechanism if the developer/contractor does not yet need occupancy permit. |
| Project inspectors trained?<br><br>Frequency: | Yes. Tom Brinkman (Lucas County-Construction Inspector) has been to Sediment & Erosion control seminars. Doug Parrish (Lucas County-Planning/Design Engineer) is CPESC. |
| If contracted inspectors are utilized, are minimum inspection, maintenance and reporting requirements specified in the contract? | N/A |

| Applicable Documents | Reviewed | Obtained |
|---|---|---|
| MS4-owned project storm water design standards and/or checklist | No | No |
| Contract language for projects that are not developed or inspected in-house | No | No |
| New Construction Checklist for Lucas County unincorporated areas | Yes | Yes |
| Comment Sheet from Lucas County Engineer to developer | Yes | No |
| Approved Site Plan letter from Lucas County Engineer | Yes | Yes |

| Post Construction Storm Water Management | |
|---|---|
| **Interview Questions** | **Response** |
| Post Construction Ordinance (or similar mechanism) in place?<br>Section of Code/Mechanism:<br>Date passed: | For Lucas County: Yes. Drainage criteria are part of Subdivision regulations (Section 604, Paragraph b.) Latest version dated 2008. |
| Does ordinance address all projects affecting 1 acre or more? | No. |
| Equivalent with technical requirements in CGP (OHC000003)? | No. |
| Are all plans reviewed? | All Plans are reviewed. It is unclear if plan submittal is triggered for all required situations. |
| Designers/reviewers trained in storm water BMP implementation? | Yes |
| Checklist used during the design and/or review of public/private post-construction BMPs? | Not specific to this issue. The County does have plan review checklist |

# MUNICIPAL STORM WATER PROGRAM EVALUATION

| Post Construction Storm Water Management | |
|---|---|
| **Interview Questions** | **Response** |
| Does review include insuring that long term O&M plans are developed and agreements are in place? | Just started. Using City of Toledo O&M agreements. County plans to do inspections each year & notify owners (have not started this yet). |
| If contracted planners and engineers are used for the design of MS4-owned projects, does the contract language specify that post-construction storm water BMPs be incorporated into the design? | Contract specifies meeting NPDES permit requirements. Will in the future |
| In-house inspection staff inspect post-construction BMPs? If so, which department?<br><br>Are all Post Construction BMPs inspected to insure BMPs are installed per requirements? | Yes. Lucas County Engineering staff. |
| Post-construction inspectors trained?<br><br>Frequency: | Yes. |
| If contracted inspectors are utilized, are minimum inspection, maintenance and reporting requirements specified in the contract? | N/A |

| Applicable Documents | Reviewed | Obtained |
|---|---|---|
| Storm water design standards and/or checklist | Yes. | Available online. |
| Contract language for projects not developed/reviewed/ inspected in-house | Yes. | No. |

**Notes**

**Regulations:** Section 703 in the Subdivision regulations requires developers to provide sediment and erosion controls. Section 604, Paragraph b. states that the subdivider shall construct storm water facilities to minimize discharge of pollutants. Section 604 also states that storm water management shall follow standards established in ODNR's Rainwater Manual. I did not see anything that required non -sediment controls. If construction activities do not fall under the Subdivision regulations, I did not see a regulatory mechanism that required the implementation of sediment and erosion controls, non-sediment controls, and post construction storm water management control. If a split is not proposed and there are no building/building alterations or zoning changes, it did not appear that anything triggers plan review, the implementation of sediment and erosion controls, or the implementation of non-sediment pollutant controls.

Lucas County Department of Building Regulations has been contracted to do plan review and building inspections for the incorporated areas of Holland and Waterville. Final building inspections are prior to occupancy and include final grading for compliance with approved plans (Building Code Section 113.3.7.a.) , but other than that, I did not see mention of storm water as pertains to sediment and erosion controls or post construction storm water management for purposes of water quality in the Building Codes. Regulations say the site plan shall indicate the following: "The storm water management design shall be based on the Lucas County Engineer's Drainage Criteria.", but there did not appear to be a statement that requires storm water management for purpose of water quality.

The permit requires that an ordinance or other regulatory mechanism be in place to require sediment and erosion controls, non-sediment pollutant controls, and post construction storm water management for new or redevelopment projects disturbing one acre or more in the larger common plan of development or

**Notes**

sale. Failure to have this is a violation of Parts III. B. 4.i. and 5.c. of the permit. If this is incorrect, please provide a copy of the regulations that cover the above-mentioned deficiencies and cite the relevant section number.

**Plan Review** - After Lucas County Engineering staff reviews a plan, written comments are routed to the county planning commission or to townships (reviewed comment sheet for project). The planning commission or townships then coordinates comments from various agencies and give them to developer. Then, the developer replies to township or to planning commission, who relays information back to Lucas County Engineer. If the Lucas County Engineer signs off, then the project goes to Zoning. Once zoning/building permit is signed, the project is authorized to break ground.

- **West Suburban Veterinary Clinic** – I looked at plans reviewed by Lucas County for West Suburban Veterinary Clinic. County looks for inlet protection, stable construction entrance, seeding, and requires NPDES permit coverage. There were no sediment pond calculations. Lucas County is not looking for non-sediment pollutant controls.

- **Overall:** More detailed information on procedures for construction and post construction storm water management (for water quality purposes) plan review must be included in the SWMP. This is a violation of Parts III.B.4.a.iv. and b.iv. of the permit. 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, 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. When plan development for municipal projects is contracted out, describe what procedures are in place to insure that Lucas County & Other's regulations and specifications are included in the plans. The current permit requires that all plans be reviewed prior to construction. While all plans are reviewed, based on our review it does not appear that plan submittal is triggered for all required situations.

**Inspections**- The SWMP must include detailed information on site inspection procedures. This is a violation of Parts III.B.4.a.vi. and b.vi. of the permit. Relevant information includes: how many sites are inspected, how often they are inspected or describe during what stages of construction they are inspected, the priority system for inspections, how construction sites and compliance inspections are tracked, how projects are prioritized to determine inspection frequency, any inspection checklist /form, frequency and type of inspector training.

- **Wildwood Medical on Reynolds** – Field visit. Brian Miller inspected in December, but he usually isn't the inspector. No checklist used for inspections. Site had detention pond, stone construction entrance, inlet protection (but some in disrepair), and an unstabilized stockpile.

- Lucas County & Others do not appear to have a system to insure that: all construction projects are having an initial inspection and monthly inspections thereafter, inspections are documented, and site compliance is tracked. These are violations of Parts III.B.4.a.vi., III.B.4.b.vi., and III.4.c. of the permit.

**Storm water Management Facilities Operation and Maintenance** - While Lucas County has started to implement a process, the SWMP does not describe how the County will ensure long-term maintenance of post-construction BMPs. This is a violation of Part III.B.5.e.vi. of the permit. The SWMP also needs to

| Notes |
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| 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.<br><br>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 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. Please make sure your SWMP is revised to satisfy these performance standards. O&M plans should stipulate the frequency of inspection and the schedule for routine and non-routine maintenance tasks. Additionally, the County 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. |

# MUNICIPAL STORM WATER PROGRAM EVALUATION

| Illicit Discharges | |
|---|---|
| **Interview Questions** | **Response** |
| IDDE Ordinance (or similar mechanism) in place?<br>Section of Code/Mechanism:<br>Date passed: | Brian Miller indicated: "To the best of my knowledge". 2010 Annual Report cites "Chapter 23 Sewer System Treatment Rule Lucas County/Toledo Health Department." |
| Does ordinance address illicit connections and dumping/spills? | Only appears to address domestic sewage and HSTS, not other illicit connections or dumping or spills. |
| Does it identify allowable non-storm water discharges? | No. |
| Does it identify local controls or conditions placed on the allowable non-storm water discharges to prevent them from being significant sources of pollutants or violating water quality standards? | No. |
| Does it provide right of entry? | Yes. |
| MS4 dry weather outfall screening done?<br><br>How often? | Some has been completed. Washington and Jerusalem Township are done. Have started Sylvania Township. Is performed in fall when survey crew has time. |
| Written illicit discharge tracking procedures in place? | County calls Health Department. |
| Written illicit discharge elimination procedures in place? | No. |
| Spill response and cleanup procedures in place? | Contact Fire Department first. Brain will ask Greg about cleanup procedures. |
| Staff trained to identify illicit discharges?<br><br>Training Materials:<br><br>Frequency: | Yes. |

| Applicable Documents | Reviewed | Obtained |
|---|---|---|
| Ordinance/Regulatory mechanism | Yes. | Yes. |
| Training materials | No. | No. |
| Training records | No. | No. |
| Tracking/Elimination procedures | SWMP & Annual Reports | On file |
| Spill and clean procedures | SWMP & Annual Reports | On file |

| Notes |
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| **Ordinance:** The existing regulations appear to cover only some types of illicit discharges. They need to be reviewed along with the rest of the SWMP to insure all types of sources and discharge mechanisms are addressed. Sources that must be address by an IDDE program include: events that result from spills, dumping, and line breaks; intermittent or continuous discharges from direct connections into the MS4, such as sanitary sewers, cross connections, or infrastructure problems with a sanitary sewer system, or malfunctioning household sewage treatment systems (HSTS); direct and indirect discharges; public or private, residential, commercial, or industrial sources.<br><br>The SWMP and the Annual Reports only mention the County's and the Health Department's enforcement abilities. Please describe the investigation procedures and enforcement process of the incorporated areas. Under state law, incorporated areas can obtain the necessary legal authority to investigate and eliminate illicit discharges.<br><br>The SWMP must describe procedures for locating priority areas; procedures for tracing the source of an illicit discharge; including the specific techniques; procedures for removing the source; and procedures for program evaluation. The SWMP and regulatory mechanism must include or reference an enforcement escalation policy. Such a policy should describe the process for eliminating the source of an illicit discharge and for obtaining recourse or abatement if necessary, and describe which staff are authorized to enforce the applicable ordinances. Failure of the Lucas County & Others to develop and implement a plan to detect and eliminate non-storm water discharges to its MS4 is a violation of Parts III.B. 3.e. and i.v. of the permit.<br><br>**Illicit Discharge Detection and Elimination Plan**: More detail is needed in the SWMP about illicit discharge investigation procedures, any evaluation criteria, and the illicit discharge elimination procedures. For Illicit Discharge response plans, a flow chart showing a clear set of procedures from initial response/detection to elimination is often useful.<br><br>Health Department data (elevated bacteria) has identified an area of illicit discharges, potentially failed HSTS, in the Whiteford Road/Alexis Road area. Please provide a map of the storm sewer system of this area and where their outfalls entering a receiving stream. Please include information on what steps are being taken to further investigate and eliminate sources of illicit discharges. If similar situations (known or suspected discharging HSTS, either directly connected to the MS4 or due to infiltration from failed systems) exist, please provide the same information. This may include several of the critical sewer areas identified in Lucas County's 208 Plan (near East Hancock, West Hancock, Longworth, Rancamp, River Road between Waterville and Maumee, Jerusalem Twp., etc.).<br><br>**Dry Weather Screening:** Lucas County & Others are in the process of conducting dry weather screening of all outfalls. The SWMP needs to include: information on the location of any priority screening areas and why they were chosen, the frequency and extent of dry weather field screening, dry-weather field screening procedures, any checklist/reporting form used, how dry weather screening and illicit discharges are tracked, official enforcement escalation plan or procedures. For dry weather screening, consider having specific criteria, which could include numeric criteria, to determine whether the discharge is illicit as opposed to being just groundwater. The Small MS4 Permit requires that dry-weather screening occur of all storm water outfalls over a 5 year permit term. |

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

| | |
|---|---|
| **Permittee: Lucas County** | |
| **Address of facility: 2504 South Detroit, Maumee** | |
| **Date of visit: 1/11/2011** | |
| **Provide the name(s) and title(s) of permittee staff present during inspection** | |
| **Name** | **Title** |
| Brain Miller | Drainage Engineer,<br>Lucas County Engineer's Office |
| Greg Wimberly | Acting Road Superintendent, Lucas County |
| | |
| **Evaluator Observations:** | |
| **SWPPP or storm water plan** | |
| Has the maintenance facility developed a SWPPP or storm water plan? | No SWP3. |
| Does the plan include a site map, list of pollutant sources, BMPs, and maintenance procedures? | No SWP3. |
| Does the permittee conduct and document periodic inspections of the facility? | Only the one annual inspection. |
| Are storm drains labeled and free of debris? | Not labeled. Appeared free of debris. |
| **Vehicle maintenance, fueling and washing** | |
| Are vehicle maintenance activities conducted in a designated place not exposed to storm water? | Engine maintenance performed inside. |
| Are fueling stations properly designed with spill kits nearby? | There is onsite fueling, with spill response materials nearby. |
| Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer? | Trucks are washed inside. Drains go to sanitary sewer. |
| **Material storage** | |
| Are all materials that are potential storm water contaminants stored under cover or in secondary containment? | No. Open garbage bin next to Pole Barn. |
| **Hazardous waste management** | |
| Are all hazardous materials properly labeled and stored to prevent exposure to storm water runoff? | All Hazardous Material appeared to be labeled. |
| **Waste management** | |
| Are waste bins covered with waste properly disposed in containers?<br><br>Are containers sealed (no rust holes, drain holes, or gaps)? | Most waste material stored inside. There was one uncovered roll-off by the Pole Barn. I did not see evidence of a discharge or leak from the container. |
| | |
| **Spill response** | |
| Does the facility have a spill response plan, and are spill kits readily available? | Spill response at Garage – no formal training. Spill response materials were available. |
| **Employee training** | |
| What type of storm water training do maintenance staff receive? | Use presentations, videos, & have quiz. Have attended TMACOG P2 training for Local MS4s. |

**Notes or additional information:**

South Detroit Facility consists of 3 Buildings: Paint Ship, Maintenance Garage, & Pole Barn.

Maintenance Building: Maintenance for onsite vehicle and county fleet is performed here. Floor drains were observed inside garage area. Blue print for the facility indicates that these are tributary to sanitary sewer. Waste anti-freeze & waste oil tanks, hydraulic oil drums were labeled. These containers and the parts cleaning station are stored inside. Floor Dry stored in a barrel next to the liquid tanks/barrel. Some oil stains were observed on the floor with the absorbant material. Spent floor dry is bagged and hauled away by Safety Kleen. Empty drums of hydraulic oil go to Shrader Tire & Oil. Trucks are washed inside.

Lucas County bags used oil filters, which are then taken by Safety Kleen. Used oil – As a generator, the County'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 County as a marketer which has certain requirements. Lucas County's waste oil and waste antifreeze are hauled off by Safety Kleen. 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.

Paint Shop: Lucas County makes signs. The building has floor drains (not sure where they lead). Vehicles may be washed inside. Scrap metal goes to outdoor metal scrap bin. County performs casting of catch basin tops and bottoms. Brine is made and stored outside. Use beet juice for anti-icing – added to salt & brine.

Outside: 2 fueling areas, recycling bins, outside storage of wood/concrete pipes & castings, PVC pipes tires. Material removed from catch basins & storm sewers are dewatered on a contained but uncovered pad. The drain in this pad is connected to sanitary sewer. Once dewatered this material is placed in the project spoils pile adjacent to the salt storage dome. **The County must maintain documentation that street sweepings, catch basin cleanings, and construction debris are properly disposed. The County should be aware that storm water passing through catch basin cleaning material may be considered leachate. The MS4 permit does not authorize the discharge of leachate.** The facility does not have an SPCC plan. You should evaluate your facility to determine if the Spill Prevention, Control, and Countermeasure regulations apply to it. If so, the SPCC plan may be used to meet some of the requirements of a Storm Water Pollution Prevention Plan. More information on SPCC can be found at: http://epa.ohio.gov/cdo/SPCC.aspx.

Salt Storage: Salt was stored in a domed building. Loading done outside. CBs by dome lead to storm sewer. Observed spilled salt on the pavement outside which needed to be picked -up. The County has a power broom to clean up salt.

Pole Barn: blue solid waste roll-off located adjacent to pole barn. Continued garbage bags of solid waste. Roll-off was not covered. Pole Barn has manhole inside with holes in the lid. According to drawings, this drains to sanitary sewer. There was a yellow traffic paint drum outside of the pole barn. This area was tributary to a storm grate NE of the building, however drawings indicate this outside catch basin is also connected to the sanitary sewers.