



**Environmental  
Protection Agency**

**John R. Kasich, Governor**

**Mary Taylor, Lt. Governor**

**Scott J. Nally, Director**

July 11, 2012

RE: CUYAHOGA COUNTY  
CITY OF WARRENSVILLE HEIGHTS  
NOTIFICATION OF MUNICIPAL STORM  
WATER PROGRAM INSPECTION

Ted Sims  
Storm Water Program Coordinator  
City of Warrensville Heights  
19700 Miles Road  
Warrensville Heights, OH 44128

Dear Mr. Sims:

Ohio EPA has completed an audit for a portion of your municipal storm water program. Our audit primarily focused on implementation of minimum control measure (MCM) #6: Pollution Prevention and Good Housekeeping for Municipal Operations. This program is a requirement of the Ohio EPA General Storm Water National Pollutant Discharge Elimination System (NPDES) Permit for Small Municipal Separate Storm Sewers Systems (MS4s) OHQ000002 and Ohio Administrative Code 3745-39.

On Wednesday, June 13, 2012, Ohio EPA met with you to determine compliance with the NPDES permit and its associated Storm Water Management Plan (SWMP). In performing this audit, Ohio EPA implemented the Municipal Storm Water Program Evaluation Guide developed by the United States Environmental Protection Agency.

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

**Violations**

- **Failure to develop a map showing the location of all outfalls and the names and location of all surface waters of the State that receive discharges from those outfalls.** This is a violation of Part III.B.3.b of the Small MS4 NPDES Permit #OHQ000002 and Ohio Revised Code (ORC) 6111.04 and 6111.07. The City needs to develop this map. Please be aware that within five years of when coverage under this general permit was granted your comprehensive storm sewer map shall also include your MS4 system, including catch basins and publicly-owned storm sewers, ditches and storm water management facilities (including publicly-owned post-construction BMPs, and privately-owned storm water management facilities constructed as post-construction BMPs for new development or redevelopment which has occurred since April 21, 2003.
- **Failure to implement procedures for the proper disposal of waste removed from your MS4, including City streets.** This is a violation of Part III.B.6.d.iii.3 of the NPDES permit and ORC 6111.04 and 6111.07. Street sweepings are a solid waste and any liquids which are decanted from such materials, as well as storm water which contacts

stockpiles of this material, is leachate, a wastewater which must be managed accordingly. The City must implement best management practices (BMPs) to prevent the discharge of this leachate. Further, these spoils may not be re-used as road fill without explicit permission from Ohio EPA's Division of Materials and Waste Management. See comments in the attached worksheets for suggestions and recommendations.

- **Failure to provide employee training on storm water pollution prevention practices at least once per year beginning in 2009.** This is a violation of Part III.B.6.e of NPDES permit #3GQ00083BG. Employee training must be provided to at least once each year of NPDES permit #OHQ000002 (2009 to 2014). The City has not developed the required staff training program expected under the MS4 program. Ted Sims and A. C. Williams have gone through training via several workshops, but these actions do not constitute a training program if information is not shared or provided to staff that must implement the practices required to comply with the NPDES permit. See the Interview Worksheet for further information on where training materials can be obtained.
- **Failure to develop a program to ensure long-term operation and maintenance (O&M) of public/ private stormwater management facilities.** This is a violation of Part III.B.5.d of the Ohio EPA General Storm Water NPDES permit and ORC 6111.04 and 6111.07. Although the City claims that they have developed a checklist and that GPD conducts periodic inspections of these facilities, no records of this could be produced. Please refer to the Storm Water Program Evaluation for more information on developing an effective long term maintenance program. A program to ensure long term maintenance of post-construction BMPs typically includes (a) maintaining an inventory of all public and those private post-construction BMPs installed since April 21, 2003, (b) maintaining a copy of the long-term maintenance plan or maintenance agreement for each BMP, (c) establishing a system to track maintenance activities by the responsible party, and (d) taking enforcement action if maintenance is not performed by the responsible party as required by the maintenance plan or agreement. Additional information can be found in the Center for Watershed Protection manual titled *Managing Stormwater in Your Community: A Guide for Building an Effective Post-Construction Program*. This manual can be downloaded at [http://www.cwp.org/index.php?option=com\\_docman&task=cat\\_view&gid=76&Itemid=118](http://www.cwp.org/index.php?option=com_docman&task=cat_view&gid=76&Itemid=118).
- **Failure to provide controls for reducing or eliminating the discharge of pollutants from the Service Garage and the Old Service Garage.** This is a violation of Part III.B.6.d.iii.2 of the Small MS4 NPDES Permit #OHQ000002 and ORC 6111.04 and 6111.07. This violation was noted for the following operations at these facilities:
  - Failure to direct all wastewater generated during vehicle and equipment washing operations conducted outdoors to a sanitary sewer system or other wastewater treatment system, or otherwise preventing its discharge at the Service Garage.
  - Failure to provide containment for the stockpile of street sweepings at the Old Service Facility. Refer to the Facility Field Inspection Worksheet for the Old Service Facility for more information.
  - Failure to implement sediment controls around material stockpiles, e.g. construction and demolition debris, yard wastes, leaves, and woodchip piles throughout the Old Service Garage yard.
  - Failure to provide secondary containment for road paints, mulch, and recycling, stored outside at the Service Garage, to prevent the discharge of pollutants.

- o Failure to provide containment for drums of material stored outside the Old Service Facility, exposed to the elements. The leakage that has already occurred must be cleaned up and the area remediated.
- o Failure to provide containment and prevent the discharge of runoff associated with salt storage.

The MS4 permit does not authorize the city to discharge leachate or wastewater, thus controls for these unauthorized discharges must be implemented immediately. Further, measures must be taken to minimize the potential for discharges of pollutants to the MS4. Implementing practices such as secondary containment, inlet protection, lidded dumpsters and capping floor drains achieves this goal. Please review the comments within the attached *Municipal Storm Water Program Evaluation and Maintenance Facility Field Inspection Worksheets* regarding these operations.

- **Failure to obtain an operating license for leaf composting activities associated with the municipal leaf and yard waste collection program.** This is a violation of Part V.N of the NPDES permit and ORC 6111.04 and 6111.07. Leaves and yard wastes from the municipal collection program are stockpiled and stored for significant periods of time at the Old Service Garage. These materials are sometimes picked up by community members for gardening purposes, indicating that composting may be occurring. The City has not obtained a Class IV composting license from CCBH. The City must either obtain this license or cease storing leaves and yard wastes for times periods exceeding 7 days.
- **Failure to maintain a written acceptance of obligation whenever the City relies on another entity to provide best management practices (BMPs) contained in the SWMP.** This is a violation of Part III.C.3 of the NPDES permit and ORC 6111.04 and 6111.07. The City relies on the Cuyahoga County Board of Health (CCBH) and GPD Associates to implement portions of the program for municipal operations on its behalf. During our interview, the City was unable to produce written agreements. If these do not yet exist, please develop a written agreement for services provided by these entities in regards to MS4 program implementation and submit a copy with your response to this letter.

#### **Deficiencies**

- The City did not know if drains inside the New and Old Service Garages went to storm or sanitary sewer. This is important information, which must be researched through building plans and dye or smoke tests. If these indoor drains are connected to storm sewer, they must be capped or redirected to sanitary.
- The SWP3s for municipal facilities subject to this program must provide a storm water contact or pollution prevention team for each facility that will have the authority and knowledge to ensure implementation of the SWP3s associated with these facilities. Currently, the SWP3 lists persons who no longer are involved with implementing this program. Further, Part IV.C.1 of the NPDES permit requires that a Table of Organization naming points of contact be submitted with your annual report. No table was provided with the 2011 report. Please send a copy of a Table of Organization for the City with your response to this letter.
- The City has not developed checklists to inspect the New or Old Service Garages. We strongly recommend the creation of storm water inspection checklists for these facilities

to standardize inspections and remind inspectors of the critical areas that must be reviewed during an inspection. Checklists should be included in the SWP3s for facilities that require one.

- The City does not appear to track the total amount of salt usage or street sweepings and catch basin cleanings removed from the MS4. Please be sure to track these amounts if you have not yet begun to do so, as it is required to be reported on the new Annual Report form. The amount of street sweepings should be tracked separately from the amount of catch basin cleanings. In addition, the City needs to track salt usage, catch basin cleaning, and street sweeping on a January-to-December calendar basis rather than a seasonal total as stated in Part IV.C of the Small MS4 NPDES Permit #OHQ000002 for reporting with the Annual Report form. Please refer to the *Municipal Storm Water Program Evaluation on deicer usage*.
- The City has not developed contract language to require storm water BMP implementation when a third-party provides municipal operations on behalf of the City. Contract language must be added to all contracts with such parties, e.g., operators that provide car impoundment, herbicide/ pesticide application and mulching services, as well as road maintenance activities and emergency repairs. Further, we recommend periodic inspection of their operations to assure that they are implementing BMPs.
- *The City is required to have an inventory of all privately-owned post-construction BMPs installed since April 21, 2003 and all public stormwater management facilities.* Ohio EPA recommends that each facility be inspected at least once a year either by the City or the party responsible for long-term maintenance. We recommend the City develop checklists or adopt checklists as your standard for conducting these inspections. This will ensure that all facilities are inspected and that all BMPs are constructed and maintained according to the City's adopted standards. See Notes in the *Stormwater Management Facilities Operation and Maintenance* section of the Municipal Storm Water Program Evaluation worksheet for information on how to improve your program.
- The City did not provide me with a copy of a pesticide, herbicide and fertilizer application plan. The development of a formal application plan is an important tool in minimizing the application of these storm water pollutants. Please provide me with an application plan.
- The City has not provided any storm water pollution prevention guidance materials to field staff that they can take out with them in the field. By making materials available to staff at the field level, implementation of storm water BMPs should improve.

#### **Annual Report Review**

In addition to the items noted above, as a result of our MS4 program audit, Ohio EPA has reviewed the MS4 annual report submitted on March 13, 2012. Upon review, Ohio EPA has determined the annual report for reporting year 2011 is incomplete. Some of the information which was not provided was covered in the review of the MCM #6 audit above; however, it appears that the City of Warrensville Heights has not enacted the following required ordinances or resolutions, or met the following NPDES permit requirements:

- **Post-Construction Storm Water Management** - Failure to enact an ordinance or resolution equivalent in technical requirements to the Ohio EPA General Storm Water NPDES Permit for Construction Activities #OHC000003 is a violation of Part III.B.5.c of

the NPDES permit. This ordinance or resolution was to be enacted within two years of NPDES permit renewal.

Please be aware that failure to comply with the NPDES permit is a violation of ORC 6111.07 and is subject to penalties. Finally, the annual report indicates the following possible areas of non-compliance with performance standards contained within the NPDES permit:

- **Public Education and Outreach** – The City of Warrensville Heights only conducted one public education and outreach program for a storm water theme or message during the reporting period. Please be aware that the NPDES permit requires you to conduct at least five storm water education campaigns during the current NPDES permit term, with at least one campaign targeting the development community. Education campaigns must employ more than one mechanism of message delivery.
- **Public Participation and Involvement** – The City of Warrensville Heights only conducted two public involvement activities during the reporting period and did not report them in a very detailed manner. Please be aware that the NPDES permit requires you to conduct at least five public involvement activities during the current NPDES permit term.
- **Dry Weather Screening of MS4 Outfalls** – The City of Warrensville Heights did not conduct any dry weather screening of MS4 outfalls during the reporting period. Please be aware that you must conduct dry weather screening of 100% of your outfalls by the end of the current NPDES permit term. If this activity has already been completed, you are to prioritize outfalls with indicators of potential illicit discharge and perform on-going, follow-up investigations to identify sources of illicit discharge and eliminate them.

Please review my comments and provide me with a letter of response indicating the actions you will take to address my concerns. **Your response should be received no later than August 10, 2012.** Please note that this response does not replace the requirement to submit an Annual Report. Your annual report for 2012 will be due on April 1, 2013.

If you have any questions, please contact me at (330) 963-1125 or via e-mail at [kelly.mcvay@epa.ohio.gov](mailto:kelly.mcvay@epa.ohio.gov).

Sincerely,



Kelly McVay  
Assistant to the District Engineer  
Division of Surface Water

KM/cs

cc: Gene Hill, P.E., Warrensville Hts Consulting City Engineer, City of Warrensville Hts

ec: Dan Bogoevski, Ohio EPA, DSW, NEDO  
Clarissa Gereby, Ohio EPA, DMWM, NEDO

# Municipal Storm Water Program Evaluation

## M54 Maintenance Component Worksheet

<b>Date of Evaluation</b> Wednesday, June 13, 2012
<b>Evaluator Name, Title</b> Kelly McVay, DSW, NEDO
<b>M54 Permittee</b> City of Warrensville Heights 3GQ00083*BG

**Instructions:** Use this worksheet as a guide for questioning M54 staff and reviewing applicable documents. Keep in mind that additional questions may be necessary based on local regulations, M54 permit requirements, implementation strategies, or water quality issues. Remember to obtain copies of any applicable documents or files which may assist in writing the M54 evaluation report.

Staff Interviewed		
Name	Department/Agency	Phone Number/Email
Ted Sims Service Director	City of Warrensville Heights	(216) 587-1335 tsims@cityofwarrensville.com

M54 Mapping			
Interview Questions	Response		
Outfalls and receiving waters mapped?	NO		
Catch basins?	NO		
Pipes, ditches, other conduits?	NO		
Public stormwater facilities (BMPs)?	NO		
Private stormwater facilities (BMPs)?	NO		
How are maps used (i.e. tracking illicit discharges)?	Maps are used to find problems when they arise.		
Applicable Documents		Reviewed	Obtained
Map(s) of MS4 system		NO	NO

Notes
<p><b>M54 Mapping</b></p> <p>The map for the City of Warrensville Heights is not completed and no copy could be provided. The City is working on updating it with GPD Associates, their consulting engineering firm. To meet the mapping obligations of NPDES Permit #OHQ000002, i.e., the M54 permit in effect from 2009-2014, the map must show <b>catch basins</b> and <b>publicly-owned storm sewers, ditches, conduits</b> and storm water management facilities (including <b>publicly-owned post-construction BMPs and underground retention</b>). In addition, the map must show <b>privately-owned storm water management facilities</b> constructed as post-construction BMPs for new development or redevelopment which has occurred since April 21, 2003.</p>

**Notes**

**Illicit Discharge Detection**

Please be aware that the NPDES permit #OHQ000002 requires the City to perform dry weather screening at all outfalls at least once by June 2014 and that a plan should be in place to do so. *If any illicit discharges are detected during this screening, the city must develop a plan to eliminate them.* For more information on the illicit discharges from HSTs please read Part III.B.3.e of the Ohio EPA General Storm Water NPDES Permit for small MS4s #OHQ000002 for expectations to address these sources.

**Catch Basin Cleaning**

Interview Question	Response		
Schedule established for inspections and cleaning?	<b>YES</b>		
	The City uses the Cuyahoga County Health Department to put chemicals in some catch basins for mosquitos and Cuyahoga County Department of Public Works to clean storm sewers per request. There is no schedule, inspections and cleanings are performed as needed.		
Is cleaning and maintenance of catch basins tracked:	<b>NO</b>		
	Mr. Sims believed there may be a report on this somewhere; however, no copy could be produced to prove this.		
How are spoils materials disposed of?	The County takes the spoils off site for disposal. Since they are the ones who clean the catch basins and dispose of the materials for the City, Mr. Sims was not sure exactly how they are disposed of.		
	<b>NOTE:</b> Please ensure that these wastes are disposed at a solid waste landfill and not a construction and demolition debris landfill.		
Are storm drain pipes inspected?	<b>YES</b>		
Proactive or only in response to blockage event?	Inspections occur only in response to problems.		
Applicable Documents		Reviewed	Obtained
List of active municipal construction projects		N/A	N/A
<b>CHECK DATABASE BEFORE INSPECTION:</b>			
List of municipal projects covered under the Ohio EPA general storm water NPDES permit for construction activities			
<b>NONE</b>			
<b>NOTE:</b> Permit is only required if project disturbs one or more acre (five or more acres for "routine maintenance")			

**Notes**

**Catch Basin Cleaning Disposal and Tracking**

The City needs to *track the amount of material removed from the catch basins and MS4 and have a running tally so the total amount can be placed in the City's annual report for 2012.* Please be sure to report the total per calendar year (January to December) in the annual report for 2012 as stated in Part IV.C.2 on reporting of the Ohio EPA General Storm Water NPDES Permit for small MS4s #OHQ000002.

**MS4 System Repair and Maintenance**

The EPA would like to see a more proactive inspection of the storm pipes in the coming years of the new permit term to help improve your MS4 program and reduce pollutants.

<b>Stormwater Management Facilities Operation and Maintenance</b>			
<b>Interview Questions</b>	<b>Response</b>		
Public facilities inspected?	<b>YES</b>		
Frequency:	Facilities are inspected at least once per year by GPD.		
Private facilities inspected?	<b>YES</b>		
Frequency:	GPD inspects these as well, Mr. Sims is unsure of frequency.		
Checklist used for inspections?	<b>NO</b> Mr. Sims believes a checklist is used; however, no copy could be provided.		
Have maintenance standards and procedures been established for these facilities?	<b>YES</b>		
How is maintenance prioritized? Is data evaluated to target maintenance resources?	Maintenance is done as needed, typically in order of importance.		
<b>Applicable Documents</b>		<b>Reviewed</b>	<b>Obtained</b>
Inspection checklist		NO	NO

**Notes****Inspections of Stormwater Management Facilities**

Mr. Sims believes that GPD does all of these inspections and keeps logs. However, no copies of these logs or checklists could be produced which forces us to assume that they may not exist. The City is required to ensure long-term maintenance of stormwater management facilities. Ohio EPA requires that this program include privately-owned facilities constructed since April 21, 2003, and all publicly-owned stormwater management facilities. Storm water management facilities include best management practices (BMPs) designed to treat the Water Quality Volume (WQv), otherwise improve the quality of runoff or reduce the volume of runoff generated. BMPs include structures such as bioretention cells, permeable pavements, green roofs, enhanced water quality swales, sand filters, extended detention ponds, constructed wetlands and proprietary devices (including underground structures). Your post-construction BMP program must include the following components:

1. Plan review to assure that post-construction storm water quality BMPs are being provided, are designed per required standards and have a long-term maintenance plan
2. Tracking the location of post-construction BMPs and the party responsible for implementing the long-term maintenance plan

3. Performing an inspection to assure that post-construction BMPs are installed per the approved plan.
4. Periodically inspecting or otherwise verifying that the post-construction BMP is being maintained in accordance with the long-term maintenance plan. *A checklist is recommended to perform inspections and should be reflective of the operation and maintenance standards established by the City.*
5. Taking enforcement action against the responsible party if they fail to maintain the BMP as required.

The City has not yet developed the robust long-term maintenance program for post-construction BMPs, which is a violation under Part III.B.5 of NPDES Permit #OHQ000002. Information on developing an effective long-term maintenance program for post-construction BMPs can be found from the Center for Watershed Protection at

[http://www.cwp.org/Resource\\_Library/Controlling\\_Runoff\\_and\\_Discharges/sm.htm](http://www.cwp.org/Resource_Library/Controlling_Runoff_and_Discharges/sm.htm).

(\*\***Tool 6:** Plan Review, BMP Construction, and Maintenance Checklists)

As a reminder, Ohio EPA has required a long-term maintenance plan for all post-construction BMPs since April 21, 2003. Although it must be a stand-alone document, it is part and parcel of the Storm Water Pollution Prevention Plan (SWP3) required by the Ohio EPA General Storm Water NPDES Permit for Construction Activities. The goal of the MS4 program is to develop a local review and approval program for the SWP3. *This includes post-construction BMPs and their long-term maintenance plans.* These plans are required to provide a schedule for routine and non-routine maintenance tasks to be undertaken. Please ensure that long-term maintenance plans are being submitted as part of the SWP3 review and approval process.

<b>Road Maintenance</b>	
<b>Interview Questions</b>	<b>Response</b>
Streets regularly swept?  Frequency:	<b>YES</b>  The City tries to sweep each street as often as possible. They typically try to have a sweeper running every day and send sweepers out behind garbage trucks to pick up any trash spilled as well.
Frequency based on water quality factors (e.g. proximity to streams)?	<b>NO</b>
How are spoils disposed of?	The City tries to sort through spoils and pick out any large branches and trees to put through the chipper. They take out bottles and plastics to recycle as well. The spoils are stored behind service building in the yard. The City might use some of this material for fill if it is clean and not oily. According to the annual report for 2011, the City takes what isn't used to Boyas Excavating to landfill.
Does the community collect road kill?	<b>YES</b>

<b>Road Maintenance</b>	
<b>Interview Questions</b>	<b>Response</b>
<p>What do they do with the carcasses?</p> <p><b>NOTE:</b> 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.</p>	<p>Carcasses are bagged and put in with garbage for disposal.</p>
<p>Does the community have a leaf collection program?</p> <p>What do they do with the collected leaves?</p> <p><b>NOTE:</b> 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.</p>	<p style="text-align: center;"><b>YES</b></p> <p>Leaves, yard wastes, and wood chips are piled behind the Old Service Garage. Wood chips are picked up by Benson (a landscaping company) if the City has too many. Community members come and pick up leaves and chips for gardening purposes as well. What is left in the yard could be left for a month or two.</p>
<p>BMPs used during road maintenance activities?</p> <p>Describe types of road maintenance conducted by community staff and the BMPs used</p>	<p style="text-align: center;"><b>YES</b></p> <p>The City mainly does crack filling, pothole repair, curb replacements, and other small tasks. Most work is done in-house but they do contract out bigger jobs such as entire street paving. They try to sweep up right after any maintenance activity and be mindful of the storm drains.</p>
<p>BMP guidance available to field staff?</p>	<p style="text-align: center;"><b>NO</b></p>
<p>Deicers used by MS4?</p>	<p style="text-align: center;"><b>YES</b></p>
<p>Type and amount of deicer and additives tracked?</p> <p>What measures are being taken to minimize the application of deicers?</p>	<p style="text-align: center;"><b>NO</b></p> <p>Salt is the only deicer used. The City plows and salts every road once after being an initial snow storm event, and then they only salt main areas during smaller snow events from that point on. Mr. Sims believes that the City tracks this information but no records could be produced.</p>
<p>Sand/salt swept up after application?</p> <p>How soon?</p>	<p style="text-align: center;"><b>YES</b></p> <p>Salt is swept up right away if it is spilled on the roads. Salt residue and trailing at the service facilities showed that this practice may not be utilized all the time.</p>
<p>Does your community operate a snow stockpile yard to</p>	<p style="text-align: center;"><b>NO</b></p>

Road Maintenance		
Interview Questions	Response	
store snow that has been removed from community streets and parking lots?	N/A	
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?		
Applicable Documents	Reviewed	Obtained
BMP guidance	NONE	NONE
Street sweeping records	NONE	NONE
Deicer application records	NO	NO

Notes
<p><b>Street Sweeping Disposal</b></p> <p>Sweeping spoils are currently piled with dirt in the yard of the Old Service Facility. The stockpiling of waste removed from the City's MS4 is considered open dumping of solid wastes and this is a violation of ORC 3734.03 and OAC 3745-27-05(C). Some of these street sweeping spoils are re-used as road fill. Although our Division of Materials and Waste Management (DMWM) is currently considering an exemption that would approve certain beneficial reuses of street sweepings, the effective rules at this time qualify street sweepings as a solid waste. You may not continue to re-use these spoils without permission from our Division of Materials and Waste Management. In addition, there is no containment of the pile, which allows for an illegal discharge of leachate. This is a violation of Part III.B.6.d.iii.3 of the NPDES permit #OHQ000002 and Ohio Revised Code 6111.04 and 6111.07. The City must find an alternative storage method for handling street sweepings</p> <p>*Also, the City needs to track the amount of material removed from the City's streets so the total amount can be placed in the City's annual report for 2012. Please be sure to report the total per calendar year (January to December) in the annual report for 2012 as stated in Part IV.C.2 on reporting of the Ohio EPA General Storm Water NPDES Permit for small MS4s #OHQ000002.</p> <p><b>Leaf Collection and Composting</b></p> <p>Through inspection of the Old Service Garage it was revealed that the leaves and yard wastes are being stored for periods of time exceeding seven days. There are no controls to prevent the discharge of leachate to waters of the state or the MS4. The Ohio EPA recommends the City establish berms around leaf storage areas to contain any leachate that is produced. If leachate must be disposed, it must be treated as waste water.</p> <p>At the time of inspection, Mr. Sims was not sure if the City was actually composting or not. Community members sometimes pick up leaves from this facility to use for gardening purposes, which is a sign of composting operations occurring; however, yard wastes rather than leaves were seen on site during the inspection which did not appear as if they were being composted purposely. If the City is composting or wishes to in the future, they must obtain a Class IV compost license from the CCBH to operate a composting operation. If the City is not composting and does not wish to in the future, the area needs to be cleaned up and all composting leaves must be removed and the leachate collected and disposed of properly.</p>

**Notes**

Should you have further questions on this topic, please contact Clarissa Gereby, of our office's Division of Materials and Waste Management, at (330) 963-1224.

**Road Maintenance**

The City must incorporate the use of storm water BMPs during road maintenance activities. Possible BMPs include the use of storm drain inlet protection to keep sediment out of the storm sewer system when saw cutting for curb replacements and checking the weather forecast before road striping to be sure that paint can dry before it rains. The NPDES permit requires road maintenance crews and third-party contractors that conduct road maintenance on your behalf to implement storm water pollution prevention practices at the work site.

Road maintenance crews should be trained in all sediment and erosion controls and controls for other wastes that are commonly implemented at construction sites. No specific informational brochures or training materials have been provided for road crews. There is no active employee training program for storm water pollution prevention at this time. Failure to provide storm water pollution prevention training to road maintenance crews is a violation of the pollution prevention and good housekeeping program. Part III.B.6.e of the NPDES Permit #OHQ000002 requires the City to conduct employee training on storm water program issues at least once annually.

**Deicer Usage**

Mr. Sims says that salt is tracked; however, no records could be produced which lead us to think otherwise. Tracking road salt usage is one BMP that can help reduce the use of deicers. By tracking this information more closely, you may spot abnormalities in salt usage that can indicate when equipment maintenance is needed, when staff may not be following salt application guidelines and when inventory loss occurs. Other practices that can reduce the use of road salt include regular calibration of salt spreaders and developing a deicer application policy that identifies the level of service to be provided, where "bare pavement" is desired, how quickly streets are to be cleared, what percentage of streets are to get priority and in what areas snow may be hauled away. Priority can be assigned based on the number of vehicles per day, traffic patterns, accident records, school zones, and commercial and industrial areas. Ohio EPA urges you to adopt the sensible salting policies recommended by the Cuyahoga County Engineer or the Salt Institute. A wealth of information is available at [www.saltinstitute.org](http://www.saltinstitute.org) on how to reduce pollution from road deicing activities.

Finally, be aware that the Annual Report requires information to be reported on a January to December calendar year basis. This may require you to adjust how you summarize salt usage data, as most communities have typically been tracking usage on a winter season basis. Please keep in mind that the City is required to track salt usage as well as the use of additives, i.e., grit.

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

**Notes**

**Flood Management**

The City does have some flood areas which have been identified by the engineering department and the county. Residents have been made aware but no flood management structures have been put in place at this time.

**Facilities Operation & Maintenance**

Interview Questions	Response													
Inventory of MS4 facilities complete (i.e. facilities owned and operated by the MS4)?	YES													
<p><b><u>Types of facilities included</u></b>  <i>These need their own NPDES storm water permit for industrial activities, if there is a discharge of runoff from these operations:</i></p> <ul style="list-style-type: none"> <li>• Landfills Type: _____</li> <li>• Airports</li> <li>• Shipping Ports or Marinas</li> <li>• Steam Electric Power Plants</li> <li>• Wastewater Treatment Plants ≥ 1 MGD or with a pretreatment program</li> </ul>	<table border="1"> <thead> <tr> <th align="center">Response</th> <th align="center">SWP3 Developed?</th> </tr> </thead> <tbody> <tr> <td align="center">NO</td> <td align="center">N/A</td> </tr> </tbody> </table>	Response	SWP3 Developed?	NO	N/A	NO	N/A	NO	N/A	NO	N/A	NO	N/A	
Response	SWP3 Developed?													
NO	N/A													
NO	N/A													
NO	N/A													
NO	N/A													
NO	N/A													
<p><i>These do not need their own permit, but do have to develop an SWP3 unless noted as N/A:</i></p> <ul style="list-style-type: none"> <li>• Impound Lots</li> <li>• Leaf Collection Yards                             <ul style="list-style-type: none"> <li>✓ No discharge of leachate permitted</li> </ul> </li> <li>• Maintenance Yards                             <ul style="list-style-type: none"> <li>➤ How many do they operate? <u>  2  </u></li> <li>➤ List facility names/locations:</li> </ul> </li> </ul> <p align="center"> <b>Service Department</b>  <b>19700 Miles Road</b> </p> <p align="center"> <b>Old Service Garage</b>  <b>18909 Miles Road</b> </p>	<table border="1"> <thead> <tr> <th align="center">Response</th> <th align="center">SWP3 Developed?</th> </tr> </thead> <tbody> <tr> <td align="center">NO</td> <td align="center">N/A</td> </tr> <tr> <td align="center">YES</td> <td align="center">N/A</td> </tr> <tr> <td align="center">YES</td> <td align="center">YES</td> </tr> </tbody> </table>	Response	SWP3 Developed?	NO	N/A	YES	N/A	YES	YES					
Response	SWP3 Developed?													
NO	N/A													
YES	N/A													
YES	YES													
<ul style="list-style-type: none"> <li>• Composting Operations                             <ul style="list-style-type: none"> <li>✓ No discharge of leachate permitted</li> </ul> </li> <li>• Solid Waste Transfer Stations or Operations                             <ul style="list-style-type: none"> <li>✓ Under landfill permit if community owns the transfer station and the landfill where waste will be taken</li> <li>✓ If not, then SWP3 is only needed if</li> </ul> </li> </ul>	<table border="1"> <thead> <tr> <th align="center">Response</th> <th align="center">SWP3 Developed?</th> </tr> </thead> <tbody> <tr> <td align="center">NO</td> <td align="center">N/A</td> </tr> <tr> <td align="center">NO</td> <td align="center">N/A</td> </tr> </tbody> </table>	Response	SWP3 Developed?	NO	N/A	NO	N/A	<p>*See notes below</p>						
Response	SWP3 Developed?													
NO	N/A													
NO	N/A													

**Facilities Operation & Maintenance**

Interview Questions	Response	
<p>vehicle maintenance, equipment washing or fueling activities occur at the transfer station, or if a portion of the facility is involved with recycling or composting</p> <ul style="list-style-type: none"> <li>• Parks &amp; Cemeteries               <ul style="list-style-type: none"> <li>➢ How many in UA? <u>  9  </u></li> <li>➢ List facility names/locations:</li> </ul> </li> </ul> <p><b>Glenview Mini Park</b></p> <p><b>Parkton Mini Park</b></p> <p><b>Eastwood Mini Park</b></p> <p><b>Harvard Mini Park</b></p> <p><b>Off Street (corner of Ridgewood)</b></p> <p><b>Gladstone Mini Park</b></p> <p><b>South Miles Mini Park</b></p> <p><b>Green &amp; Miles Mini Park</b></p> <p><b>Green Road Park</b></p>	<p><b>YES</b></p>	<p><b>N/A</b></p> <p>Mowers are stored at some of the parks, but no washing or maintenance occurs there.</p>
<ul style="list-style-type: none"> <li>• Parking Lots               <ul style="list-style-type: none"> <li>➢ How many do they operate? _____</li> <li>➢ List facility name/locations:</li> </ul> </li> </ul>	<p><b>NO</b></p>	<p><b>N/A</b></p>
<ul style="list-style-type: none"> <li>• Bus Terminals</li> <li>• Vehicle Maintenance Garages               <ul style="list-style-type: none"> <li>➢ How many do they operate? <u>  1  </u></li> <li>➢ List facility name/locations:</li> </ul> </li> </ul> <p><b>Service Department</b> <b>19700 Miles Road</b></p>	<p><b>NO</b> <b>YES</b></p>	<p><b>N/A</b> <b>YES</b></p> <p>*SWP3 (or, in case of airport and shipping port, NPDES permit for industrial storm water) required only if vehicle maintenance, equipment cleaning or deicing operations occur.</p>

<b>Facilities Operation &amp; Maintenance</b>	
<b>Interview Questions</b>	<b>Response</b>
<p>Facilities inspected?</p> <p><b>NOTE:</b> Go through list above where YES is response and write in answers for each activity.</p> <p>Frequency:</p> <p><b>NOTE:</b> Go through list above where YES is response and write in answers for each activity.</p>	<p><b>NO</b></p> <p>Both facilities are inspected casually as Ted or other employees walk through. However, there are no formal inspections or documentation of any inspections.</p>
<p>Checklist used?</p> <p><b>NOTE:</b> Go through list above where YES is response and write in answers for each activity. Checklist should be part of SWP3.</p>	<p><b>NO</b></p>
<p>Staff which perform the inspections (department or agency):</p> <p><b>NOTE:</b> Go through list above where YES is response and write in answers for each activity. Checklist should document name of inspector.</p>	<p>Ted Sims is currently the one who would conduct casual walk through inspections.</p>
<p>Is there a designated stormwater contact person for each facility?</p> <p><b>NOTE:</b> Go through list above where YES is response and write in answers for each activity. Name in SWP3 should match name given. If not, SWP3 must be updated.</p>	<p><b>NO</b></p> <p>The SWP3 lists Mr. A.C. Williams as the primary contact for both facilities. Since Mr. Williams is no longer there, this should be updated to include Ted Sims.</p>
<p>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?:</p>	<p>There is no formal procedure related to storm water noncompliance. The City follows the union contract for all enforcement actions.</p>
<p>Parking lots owned/operated by the permittee swept?</p> <p>Frequency?</p> <p>Do you operate any asphalt parking lots?</p> <p>Do you use any coal tar-based sealants on those asphalt parking lots?</p> <p><b>NOTE:</b> Some MS4s have banned the use of coal tar-based sealants in their communities. Research from the University of New Hampshire Stormwater Center</p>	<p><b>NO</b></p> <p><b>N/A</b></p> <p><b>NO</b></p> <p><b>NO</b></p>

<b>Facilities Operation &amp; Maintenance</b>		
<b>Interview Questions</b>	<b>Response</b>	
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.		
Do you have any combined sewer systems?	NO	
If yes, do you have any combined sewer overflows? ➤ How many? _____ ➤ Do you track frequency and volume?	N/A	
Are you aware of any illicit cross connections between your sanitary sewer and MS4?	NO	
If so, what is your plan to eliminate this illicit discharge?		
Have you investigated the extent of infiltration and inflow into storm sewer system?	NO	
What methods have been used to conduct this investigation?	There have been no issues that Mr. Sims knows of at this point.	
What are your plans to repair and eliminate this source of illicit discharge?	No plans at this time since there are not any problems that the City is aware of.	
Sewer spill and cleanup procedures in place?	NO	
	There are no SSO's in the City that Mr. Sims is aware of.	
<b>Applicable Documents</b>	<b>Reviewed</b>	<b>Obtained</b>
Facility inventory	YES	YES
Facility SWPPP	YES	YES

<b>Notes</b>
<p><b><u>Composting Operations:</u></b> The City is not sure if they are composting or not at the Old Service Garage. Action needs to be taken to obtain a permit if composting is to be done here or yard wastes must have a quicker turnover rate and sit at the facility for less time. For further information, see notes of Road Maintenance Section and the Old Service Garage Facility Inspection Worksheet.</p>

<b>Pesticides, Herbicides &amp; Fertilizers</b>	
<b>Interview Questions</b>	<b>Response</b>
Certified applicators used?	YES

Integrated Pest Management (IPM) practices used?	YES	
Storage location of pesticides, herbicides, and fertilizers:	These items are stored in containers at the service department.	
BMPs used during application:	The City does not spray when it is windy and try to spray when it is hot. They don't apply weed killer or fertilizer very often. It is mostly for small touch ups at the service facilities. They are currently in the process of contracting out weed killing and fertilizing to another company.	
Fertilizer/pesticide application plan utilized?	NO	
	<b>Applicable Documents</b>	
	<b>Reviewed</b>	<b>Obtained</b>
Fertilizer/pesticide application plan	NONE	NONE

#### Notes

##### **Pesticide, Herbicide and Fertilizer Storage Requirements**

Please be aware, pesticides cannot be stored above or against medicines, foods, feeds or toys. They cannot be stored in a room where a spill would result in a release to the environment (such as a room with a floor drain connected to the storm sewer...if you run across this, the floor drain should be capped or the pesticide should be in secondary containment). Containers must be labeled to identify the material they contain. Products with a skull and cross bones on the label cannot be stored in an area that can be accessed by children. The Department of Agriculture recommends these products be stored in a locked cabinet. Pesticides must be stored in a room (or cabinet) that is capable of being locked when not attended. The Dept. of Agriculture also recommends that a spill kit and fire extinguisher be kept nearby and that personal protective equipment is available for use if necessary.

##### **BMPs for Pesticide, Herbicide and Fertilizer Application**

Pesticides, herbicides and fertilizers should not be applied when the forecast calls for rain. The label of most products will provide guidance on when and how much of these materials should be applied. Do not exceed manufacturers' recommendations. In addition, crews must be trained to avoid overspray and to implement dry clean-up methods, e.g., sweep up, should spills occur. Under no circumstance should crews hose spilled materials into storm drains. Storm drains near application areas can be temporarily covered to prevent overspray or spills from entering the MS4. The usage of fertilizers can also be reduced by replacing typical lawn-type grasses with natural, slow-growing grass species that require less or no fertilizers to be sustained. The City of Cleveland is using this method to revegetate neighborhoods where blighted homes have been razed. The City of Twinsburg recently planted a field with native vegetation at their Stone House park. This will reduce costs to these cities to maintain these new greenspaces.

Integrated Pest Management (IPM) is an effective and environmentally sensitive approach to pest management that relies on a combination of common-sense practices. IPM programs use current, comprehensive information on the life cycles of pests and their interaction with the environment. This information, in combination with available pest control methods, is used to manage pest damage by the most economical means, and with the least possible hazard to people, property, and the environment. For further information, please refer to <http://www.epa.gov/pesticides/factsheets/ipm.htm>.

Example pesticide, herbicide and fertilizer application plans are available from our MS4 education workshops. Information is archived at [www.epa.ohio.gov/ocapp/storm\\_water.aspx](http://www.epa.ohio.gov/ocapp/storm_water.aspx).

## Notes

### **Application Plan**

The City does not have a documented pesticide, herbicide and fertilizer application plan. The application records should keep track of the name of the substance being applied and the type of chemical, amount used and time the material is being applied as well as who the applicator was. If a contractor is being used as well, the *City needs to include language into the contract that requires the contractor to consider pollution controls where the activities undertaken are a potential source of storm water pollution.*

Please provide me with a copy of the City's pesticide, herbicide and fertilizer application plan.

### **NPDES Permits for Pesticide Application**

On October 31, 2012, Ohio EPA issued a general NPDES permit for the discharge of biological pesticides and those chemical pesticides that leave a residue (NPDES permit #OHG870001). MS4s that apply such pesticides in, over or near waterways, e.g., as part of golf course or green space management, are subject to the requirements of this NPDES permit. Most situations are covered by rule meaning submittal of an NOI (permit application) is typically not required. However, an NOI is required if pesticides are applied:

- Directly to public water supply reservoirs
- To very high quality waters (outstanding national resource waters, outstanding state waters or superior high quality waters other than Lake Erie)
- To waters to control non-native fish populations
- To more than 80 acres of wetlands per year
- To forests, or applied aurally to Lake Erie

The best way for MS4s to avoid a permit violation is to leave a buffer around surface waters (lakes, ponds, wetlands, rivers, streams and ditches that connect to surface waters or ground water) when applying pesticides. Ohio EPA has not set technical criteria for the term "near water" because doing so would not limit an applicator's liability under the federal Clean Water Act. If you must apply pesticides to surface waters, e.g., mosquito control, it must occur in compliance with the NPDES permit. If the treatment area exceeds certain thresholds, there are additional documentation and reporting requirements. Those thresholds are:

- 6400 acres for mosquito/insect control
- 80 acres for wetland and lake application
- 20 linear miles for stream/ditch bank application or intrusive vegetation control

Communities with populations less than 10,000 are not required to implement Integrated Pest Management (IPM) and do not have to prepare a Pesticide Discharge Management Plan, even if thresholds are exceeded. However, they must still submit the annual report required by NPDES permit #OHG870001 to Ohio EPA.

All applications of pesticides and herbicides "in, over or near" surface waters are covered, including small-scale uses. A fact sheet on the new permit can be found on the Ohio EPA website at [http://www.epa.ohio.gov/portals/35/permits/Pesticide\\_Final\\_FS\\_oct11.pdf](http://www.epa.ohio.gov/portals/35/permits/Pesticide_Final_FS_oct11.pdf). If you need more information about this program, please contact Eric Nygaard in our Central Office at (614) 644-2024.

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 Health Department and County are used along with contracted road maintenance crews for large projects. May have contracted fertilizer applicators in the future.	
BMP guidance materials provided to contracted staff?	NO	
Requirement to consider stormwater impacts and utilize appropriate BMPs in contracts?	NO Mr. Sims is not sure if they have language in the contracts. but they haven't had much contracted work in the past to show for.	
Materials used to educate the public regarding stormwater impacts on MS4 property (if applicable, i.e. public spaces):	Pet waste: There are pick up pet waste signs at the park. It was suggested that the City add signage to relate this issue to storm water pollution.  Litter reduction: No, it was suggested that signage be added to trash bins to tie the problem into water quality.	
	<b>Applicable Documents</b>	<b>Reviewed</b> <b>Obtained</b>
	BMP manual or guidance document	NONE    NONE
	Contract language for MS4 operation and maintenance activities	NONE    NONE

Notes
<p><b>Technical Guidance and Specifications for Maintenance Staff</b></p> <p>The City needs to improve the dissemination of technical guidance to its maintenance staff on storm water pollution prevention matters. The City should look for posters that can be hung in work areas or lunchrooms, or guidebooks that can be taken out into the field with maintenance crews. This will help reinforce employee training. The City needs to train staff on the SWP3 for the Service Garage and the Old Service Garage and should look to adopt standards and specifications for storm water pollution prevention implementation in all its municipal operations with the potential to ease pollutants in storm water runoff. Existing guidance manuals you may find useful to meet this goal include the <b>Rainwater and Land Development</b> manual (ODNR, 2006) and the <b>Municipal Pollution Prevention/Good Housekeeping Manual #9</b> (Center for Watershed Protection, September 2008). This manual is available as a free download on their website at <a href="http://www.cwp.org/formmaker/Download-Form_RedirectFormPage.html">http://www.cwp.org/formmaker/Download-Form_RedirectFormPage.html</a>.</p> <p><b>Contracted Staff</b></p> <p>Contracted staff include: road paving and repairs, fertilizing, storm sewer cleaning, etc. Please be sure to include language requiring pollution controls in all contracts and requests for proposal (RFPs) where the activities are a potential source of storm water pollution. The operations of third party service providers should be reviewed periodically by the City to ensure that the required pollution controls are being implemented.</p>

**Notes**

**Public Education and Outreach**

Please be aware that the performance standards established in NPDES permit #OHQ000002 require the City to use more than 1 mechanism and target at least 5 different storm water themes or messages over the permit term. In addition, you must provide at least 5 public involvement opportunities over the permit term. Certain activities, such as stream clean-ups or storm drain stenciling projects with local boy scout troops, can count toward both requirements because they involve the public as well as educate them on storm water pollution issues.

Further, please be aware that NPDES permit #OHQ000002 requires at least one of your public education themes or messages to be targeted to the development community, i.e., contractors and developers. You may wish to work with the Cuyahoga Soil & Water Conservation District (SWCD) or neighboring communities to sponsor a regional event to satisfy this requirement. Other possibilities to meet this requirement: (a) include a brochure on sediment and erosion control practices with building permits when they are issued, (b) provide posters with storm water do's and don'ts that can be hung on trailers at construction sites, (c) give a presentation about your erosion and sediment control requirements at a local homebuilders association meeting or (d) provide training on erosion and sediment control as part of a contractor licensing program and require attendance to maintain the license.

**Staff Education and Training**

Interview Questions	Response	
Staff trained to identify potential storm water pollution sources which would result in an illicit discharge?  Frequency:	NO  Mr. Sims has been to storm water workshops in Toledo and Tri-C along with Mr. A.C. Williams, who is no longer with the department.  There is no training for other employees in place and no meetings have been held to pass on the information learned at the aforementioned workshops.	
Materials used to train staff:	NONE	
Applicable Documents	Reviewed	Obtained
Training materials	NONE	NONE

**Notes**

**MS4 Staff Training**

The first generation of the MS4 permit required the City to develop an employee training program to prevent and reduce storm water pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances and storm water system maintenance.

*Please note that NPDES permit #OHQ000002 requires the City to conduct at least one employee training event on these topics per year. If key management staff attends a storm water education event, it is expected that the information learned will be shared with the appropriate staff so that they*

### Notes

can conduct their job duties without causing storm water pollution. The City should also look to incorporate training on storm water pollution prevention in any new employee training program that may exist if that employee's job duties have the potential to create storm water pollution or include illicit discharge identification and elimination.

For training that the City organizes for its staff, please retain: (1) the agenda for the training session, including the date that training was provided and names/organizations of the speakers, (2) an attendance list with the signatures of attendees and (3) one copy of the materials used for training. For outside training attended, include an agenda (if available) or a list of topics, the names of attendees, date attended and a copy of any attendance certificate issued by the training organization.

The following materials may help with developing a training program:

Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) has 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](http://epa.ohio.gov/ocapp/storm_water.aspx) and can be used to provide training to your staff. Future training events involving Ohio EPA are listed on this site as well.

ODOT's Local Technical Assistance Program (LTAP) maintains a library of training videos, including videos on storm water pollution prevention that can be borrowed at no cost. Adrienne LaFavre of Ohio EPA's OCAPP program also has training videos available for loan at no cost. Adrienne can be contacted at (330) 963-1250.

US EPA has 2 to 3 webcasts per minimum control measure that can be viewed at any time over the internet at [www.epa.gov/npdes/training](http://www.epa.gov/npdes/training).

The Center for Watershed Protection also has information available for training in their Manual #9: Municipal Pollution Prevention/Good Housekeeping Practices.

The Lake County (OH) Stormwater Management Department has developed a series of Toolbox Talks that can be used during staff meetings to train maintenance staff on a single storm water pollution prevention topic at a time. This tool is intended to provide training by eliciting discussion amongst the staff and can be completed in less than 15 minutes per topic. Please contact Tim Miller, Director of the LCSMD at (440) 350-5900 for further information.

# FIELD INSPECTION WORKSHEET

## MS4 SWMP Evaluation

### MS4 Maintenance Facility Field Inspection Worksheet

<b>Permittee:</b> City of Warrensville Heights – Service Garage	
<b>Address of facility:</b> 19700 Miles Road	<b>Size of facility:</b> About 3 acres
<b>Date of visit:</b> 6/13/12	<b>Time of visit:</b> 10:00am
<b>Provide the name(s) and title(s) of permittee staff present during inspection</b>	
<b>Name</b>	<b>Title</b>
<b>Ted Sims</b>	<b>Service Director</b>
<b>Evaluator Observations:</b>	
<b>SWPPP or stormwater plan</b>	
Has the maintenance facility developed a SWPPP or stormwater plan?	<b>YES</b>
Does the plan include a site map, list of pollutant sources, BMPs, and maintenance procedures?	<b>YES</b>
Does the permittee conduct and document periodic inspections of the facility?	<b>NO</b>
Are storm drains labeled and free of debris?	Not labeled.
<b>Vehicle maintenance, fueling and washing</b>	
Are vehicle maintenance activities conducted in a designated place not exposed to stormwater?	<b>YES</b>
Are fueling stations properly designed with spill kits nearby?	<b>N/A</b>
Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer?	Yes, washing occurs on-site. Cars are washing indoors, sometimes with soap, over a drain. It has not been confirmed where this drain goes. Trucks are sometimes washed outside but no soaps or detergents are used.
<b>Material storage</b>	
Are all materials that are potential stormwater contaminants stored under cover or in secondary containment?	<p>Empty, or nearly empty, road paint buckets were left outside of the building. Paint was observed on the ground in the area indicating spills have occurred. These materials should be moved indoors or placed within secondary containment of a tray.</p> <p>The mulch and recycling storage area was uncovered and not graded to contain any leachates or contact water. Recycling is picked up weekly or bi-weekly usually. These bins should be covered to prevent any leachate formation. As discussed, a berm could also be added to prevent any liquids from recyclables from being released to your MS4. Further, mulch was spilled around the bin which should be swept up and returned to the containment of the bin.</p>

<b>Hazardous waste management</b>	
Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff?	<b>YES.</b> Aerosols, solvents, motor oils, batteries, and car parts are stored indoors in a material storage area.
<b>Waste management</b>	
Are waste bins covered with waste properly disposed in containers?	<b>NO.</b> One waste bin was observed outside of the service department but was left uncovered and was missing the drain plug.
How is landscape waste stored?	<b>N/A</b>
<b>Spill response</b>	
Does the facility have a spill response plan, and are spill kits readily available?	They have a spill response plan; spill kits were located inside on the east end of the building. More kits should be located closer to areas where they might be needed, such as by the area where vehicles are staged for repairs and near the maintenance garage. Staining observed on site might indicate that spill kits are not being used every time a spill occurs.
<b>Employee training</b>	
What type of stormwater training do maintenance staff receive?	<b>NONE.</b> Employee training on storm water pollution prevention practices and identifying pollution sources must be provided.
<b>Notes or additional information:</b>	
<b><u>Interior Drains</u></b>	
Mr. Sims was unsure as to whether drains inside of the building were connected to storm or sanitary sewer. The SWP3 for the facility indicated that dye testing was an action item which was to be completed to determine where these drains go. Verification, via dye or smoke testing, should be provided to show where these drains go and to determine what changes might need to be made to ensure non storm water discharges are not being made to your MS4.	
<b><u>Vehicle Washing</u></b>	
Currently vehicle washing occurs both inside and outside a bay on the east side of the building. Typically cars are washing inside and larger trucks are washed outside. At the time of inspection it was not clear whether the floor drain in the inside washing area went to storm or sanitary sewer. Water from washing activities is considered waste water and cannot be discharged to your MS4. Vehicle washing cannot continue to be done outdoors. All washing must occur in the indoor wash bay which drains to sanitary sewer or at a commercial car wash. If the drain in the wash area goes to storm sewer, it must be redirected to sanitary or cease to be used as a wash area.	
<b><u>Salt Storage</u></b>	
At the time of inspection salt residue was spread across the ground in front of the storage bin and a couple of small piles were left outside of the bin as well. Salt trailing was evident around the paved areas. All salt must be swept up and removed from this area and placed in the dome or stored per the guidance provided at <a href="http://www.epa.ohio.gov/portals/35/storm/Interim_Salt_Storage_Guidance.pdf">http://www.epa.ohio.gov/portals/35/storm/Interim_Salt_Storage_Guidance.pdf</a> . Any spilled salt around the area must be swept up. Good housekeeping methods should be used to consistently clean up salt spills once they occur during the season to prevent buildup of salt around the dome.	

If you must store salt outside the salt storage dome when it is delivered, please check our website at [www.epa.ohio.gov/dsw/storm/index.aspx](http://www.epa.ohio.gov/dsw/storm/index.aspx) to see if the final salt storage guidance document has been released. If released, storage practices should be in accordance with the final guidance document rather than the interim document.

### Yard Storage

Plows, bins waiting for repair, and various other materials were stored in the yard area. Although no obvious staining or signs of contaminated run off were present, this area should be monitored and maintained to ensure that it does not become a junkyard. Items which are becoming rusty should either be repaired or disposed of. Unused items could be disposed of as well. Any drums, vehicles, or other materials stored outside should remain in good condition if they are to be kept outside for any period of time.

## INSPECTION PHOTOS

### Service Garage

City of Warrensville Heights

Photos Taken: June 13, 2012



**Fig. 1 & 2:** Both images are of drains located in the east side of the building. It was not clear at the time of inspection whether these drains go to storm or sanitary sewer. Verification, through dye or smoke testing for example, should be provided to ensure that these drains go to sanitary sewer. If they are connected to storm sewer, they must be permanently capped or redirected to sanitary.



**Fig. 3:** Another drain in the east side of the building with staining all around the area. If this drain goes to storm it must be capped or redirected to sanitary. Spill kits should be placed nearby and used to clean up spills as soon as they occur.

**Fig. 4:** Household items dropped off by residents are stored just inside of a bay on the east side of the building. These items should be placed in secondary containment (via berming the area, containment trays, etc.).



**Fig. 5 & 6:** Salt stored at the facility was not kept contained to the bin. Piles of salt were left outside and salt residue covered the area in front of the bin. All salt should be swept or moved back into the bin and any contaminated ground removed.



**Fig 7:** It appeared that some yellow road paint had been spilled behind the building. Make sure spill kits are kept nearby and used when spills occur. This area should be cleaned up and contaminated soils removed.

**Fig. 8:** Some old bins were being stored in the yard waiting to be repaired to reuse or scrapped. Make sure materials are not sitting in the yard for extensive periods of time, allowing for rusting and accumulation of debris.



**Fig. 9 & 10:** Mulch which is used by the City and recyclables dropped off by residents are stored on concrete pads behind the facility. More containment must be provided for these areas.



**Fig. 11:** Rusty and unused snow plows were stored behind the facility. These parts did not seem to show any signs of leakage of hydraulic fluids at the time of inspection, but should be monitored frequently or have their hydraulic fittings bagged to prevent any leaks in the future. Any materials that are not intended to be used in the future should be gotten rid of to minimize potential pollutant sources.

**Fig. 12:** The concrete outside of the maintenance bays was stained from vehicles being staged in the area. Spill kits should be placed nearby so spills and leaks can be cleaned up immediately and drip pans used to catch any leaks.



**Fig. 13 & 14:** Drains in the maintenance area. If they are storm drains they must be capped or redirected.



**Fig. 15:** Drain in the maintenance area. If they are storm drains they must be capped or redirected.

**Fig. 16:** Drums of material inside the maintenance garage. Be aware that all containers which are to be used for used oil must be labeled as "Used Oil".



**Fig. 17:** Several drums were stored outside of the maintenance area. As long as these drums stay labeled, in good condition, and closed they may remain outside. It is always preferable to keep such materials inside and on secondary containment if possible.

**Fig. 18:** A dumpster outside of the office area used for general trash was left uncovered. This dumpster must be kept covered to prevent the formation of leachate.



**Fig. 19:** The dumpster mentioned above also was missing its drain plug. This plug should be replaced to keep any liquids from escaping.



**Fig. 20:** Mostly empty road paint containers were left behind the building. Paint was observed on the ground in this area indicating spills or leaks had occurred. This material should be placed indoors or within secondary containment.

# FIELD INSPECTION WORKSHEET

## MS4 SWMP Evaluation

### MS4 Maintenance Facility Field Inspection Worksheet

<b>Permittee:</b> City of Warrensville Heights – Old Service Garage	
<b>Address of facility:</b> 18909 Miles Road	<b>Size of facility:</b> About 2 acres
<b>Date of visit:</b> 6/13/2012	<b>Time of visit:</b> 10:45am
<b>Provide the name(s) and title(s) of permittee staff present during inspection</b>	
<b>Name</b>	<b>Title</b>
<b>Ted Sims</b>	<b>Service Director</b>
<b>Evaluator Observations:</b>	
<b>SWPPP or stormwater plan</b>	
Has the maintenance facility developed a SWPPP or stormwater plan?	<b>YES</b>
Does the plan include a site map, list of pollutant sources, BMPs, and maintenance procedures?	<b>YES</b>
Does the permittee conduct and document periodic inspections of the facility?	<b>NO</b>
Are storm drains labeled and free of debris?	Not labeled.
<b>Vehicle maintenance, fueling and washing</b>	
Are vehicle maintenance activities conducted in a designated place not exposed to stormwater?	<b>N/A</b>
Are fueling stations properly designed with spill kits nearby?	Fuel stations had automatic shut off valves and an emergency shut off button was properly labeled. Staining indicated spills had occurred and a spill kit was not observed on site. Spill kits should be located at the fuel station and any spills cleaned up immediately.
Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer?	<b>NO</b>
<b>Material storage</b>	
Are all materials that are potential stormwater contaminants stored under cover or in secondary containment?	Some salt was stored in a secondary area which was not completely covered. Traces of salt and smalls piles were seen all around the site.  Old rusty drums were stored outside of the building. Mr. Sims said they have plans to have them picked up and disposed of. Some of these drums had rust holes and water accumulation inside. These drums and the liquids inside must be disposed of properly as soon as possible.
<b>Hazardous waste management</b>	
Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff?	Three unlabeled drums were in another uncovered area next to the secondary salt pile. One of these drums had an opening and was filled to the brim.

	<p>Dark staining indicated overflow or spillage of some sort had occurred in this area. These drums must be removed immediately. All drums must be labeled and if they are stored outside they must be kept closed.</p> <p>Other drums of material were found inside of the building near a garage door on the north side. There were signs of leakage in this area and staining showed that liquids had potentially escaped the area and went out the edge of the garage door. These drums should be placed on secondary containment or further from the door to prevent any material from leaving the premises and contaminating storm water.</p>
<b>Waste management</b>	
Are waste bins covered with waste properly disposed in containers?	No waste bins were observed.
How is landscape waste stored?	
<b>Spill response</b>	
Does the facility have a spill response plan, and are spill kits readily available?	They have a spill response plan but no spill kits were observed on site.
<b>Employee training</b>	
What type of stormwater training does maintenance staff receive?	<b>NONE.</b> Employee training on storm water pollution prevention practices and identifying pollution sources must be provided.
<p><b>Notes or additional information:</b></p> <p><b><u>Salt Storage</u></b>  Salt had accumulated around the front of the main salt storage building and traces of salt were evident in a large area in front of the building as well as in a spot behind the building. Further, more salt was being stored in another secondary area which was merely covered by a few beams rather than a full roof. Traces of salt were prevalent around this area as well. All salt must be kept in a completely covered area or under cover of a tarp which is secured around the sides. As discussed, it appeared that there was plenty of room left in the primary salt building for the secondary pile to be moved inside. All salt must be swept up and removed from this uncovered area and placed in the dome or stored per the guidance provided at <a href="http://www.epa.ohio.gov/portals/35/storm/Interim_Salt_Storage_Guidance.pdf">http://www.epa.ohio.gov/portals/35/storm/Interim_Salt_Storage_Guidance.pdf</a>. Good housekeeping methods should be used to consistently clean up salt spills once they occur during the season to prevent buildup of salt around the dome.</p> <p>If you must store salt outside the salt storage dome when it is delivered, please check our website at <a href="http://www.epa.ohio.gov/dsw/storm/index.aspx">www.epa.ohio.gov/dsw/storm/index.aspx</a> to see if the final salt storage guidance document has been released. If released, storage practices should be in accordance with the final guidance document rather than the interim document.</p>	

### **Street Sweeping Spoils**

Street sweeping spoils were placed in a pile with what looked like dirt or excavated materials behind the main salt building. This is a violation of Part III.B.6.d.iii.3 of the NPDES permit and Ohio Revised Code 6111.04 and 6111.07. Street sweepings are a solid waste and any liquids which are decanted from such materials, as well as storm water which contacts stockpiles of this material is leachate, a wastewater which must be managed accordingly. The City must implement best management practices (BMPs) to prevent the discharge of this leachate such as installing a dewatering pad connected to sanitary sewer to store spoils on, storing spoils indoors where floor drains go to sanitary, outside in a berm area where storm water and leachate are properly managed and the pile is covered to minimize runoff, or by using a covered dumpster which is in good condition and will not allow leaks to store street sweepings in until they can be disposed of at a licensed Municipal Solid Waste Landfill.

Street sweepings, which are not oily or from spill clean ups, are sometimes used for road fill. The Ohio EPA is currently working on developing a guidance document evaluating alternate management options such as this; however, you may not re-use this material at this time without written permission from the Ohio EPAs Division of Materials and Waste Management (DMWM). The City may not continue to re-use street sweeping spoils unless permission from DMWM is obtained.

### **Yard Waste**

During the interview portion of the inspection, Mr. Sims indicated that collected leaves are stored in this yard for extensive periods of time and that community members sometimes pick them up to use for gardening purposes. During the inspection it was observed that most of the material was yard waste and not just leaves. It was estimated that this material may have been on site for a couple months or so. Ohio Administrative Code 3745-27-03(A) (2) states that the temporary storage of yard wastes in excess of seven days is considered open dumping.

The City was unsure if they were actually composting leaves and yard waste or not. Because some yard waste is given away to use in gardens and these wastes are kept on site for long periods of time, this could be a possibility. Be aware that failure to obtain an operating license for leaf composting activities associated with the municipal leaf collection program is a violation of Part V.N of the NPDES permit and ORC 6111.04 and 6111.07. In order to compost at this facility, the City must obtain a Class IV Compost Facility License from the Cuyahoga County Board of Health and comply with the stipulations that come with obtaining this license. If the City does not wish to obtain this licensure and compost yard wastes materials themselves, they must take any yard waste material to a Class IV Licensed Facility within seven days of receiving said materials. Regardless of the path chosen, this material and any leachate it produces must be contained to minimize its risk as a storm water pollutant while on site.

### **Material Stockpiles**

On the west side of the yard there was a pile of construction and demolition debris. This pile should be removed and landfilled or placed in a covered dumpster to prevent leachate from forming and being released to your MS4.

Piles of yard waste, wood chips, and various other materials were also stored in this area. Some of these piles were beginning to get pushed into surrounding areas and off of the intended storage area. As discussed, the addition of a vegetated berm around the area could be beneficial in keeping material contained to the yard and out of surrounding grass and flow areas. Make sure materials placed in this area are kept on the cleared area and are not getting pushed off the edges.

**INSPECTION PHOTOS**  
**Old Service Garage**  
City of Warrensville Heights  
Photos Taken: June 13, 2012



**Fig. 1 & 2:** The fueling station had staining which trailed towards a storm drain in the gravel area. Spill kits must be placed nearby and used as soon as a spill occurs.



**Fig. 3 & 4:** Unused drums were stored along the edge of the building. Rusting and holes have formed causing some to fill up with liquid. These drums must be removed and disposed of properly to prevent more accumulation of water which could be discharged to the MS4, as it can contain contaminants from whatever was in the drum previously.



**Fig. 5:** Salt was trailing out of the salt storage building and piled up along the front of the building. All salt should be contained in the building and any spills swept up and disposed of.

**Fig. 6:** More salt residue was on the ground behind the salt storage building. Salt should only be stored in the building and any spills or salt residue must be cleaned up and kept contained.



**Fig. 6 & 7:** Behind the salt storage building dirt and other materials were stored in a pile. Street sweeping were dumped on this pile as well. This is not an acceptable practice.



**Fig. 8 & 9:** Construction and demolition debris was piled in the yard area. This should be removed.



**Fig. 10 & 11:** Materials being stored in the back of the yard were starting to be pushed into surrounding areas. The addition of a berm was suggested to keep stockpiles and material contained to the yard.



**Fig. 12 & 13:** Yard waste piles stored on site must be turned over to a composting facility at a quicker rate. This material was starting to be pushed into the surrounding grass as well.



**Fig. 14:** This secondary salt storage bin is not acceptable. The pile was not completely covered by a roof and salt was spilling out everywhere. This salt should be moved into the primary salt storage building and all remaining matter cleaned up from this area.

**Fig. 15:** Four unlabeled drums were left in a partially covered area next to the secondary salt storage bin. Staining indicated leakage had occurred.



**Fig. 16:** One of the drums pictured in Figure 15 was open and filled to the brim. This drum may have overflowed causing some of the staining.

**Fig. 17:** Staining outside of the area where these drums were stored was very dark and covered a large area. All drums should be labeled of their contents to ensure proper disposal and open drums cannot be stored outside.



**Fig. 18 & 19:** It was unclear whether these drains in the building are connected to storm or sanitary sewer. The drain pictured on the right had a grate which said that it drained to waterways. If these are storm drains, they must be either permanently capped or redirected to sanitary sewer.



**Fig. 20:** Drums of material stored inside the building showed signs of leakage. Due to their close proximity to the doorways and some staining which showed liquids may have traveled outside, these materials should be moved further from the door or placed on secondary containment to catch and leaks or spills.