



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

July 10, 2012

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

Gerald Wise
Storm Water Program Coordinator
City of Brecksville
9069 Brecksville Road
Brecksville, OH 44141

Dear Mr. Wise:

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 June 26, 2012, Ohio EPA met with you and other representatives of the City of Brecksville 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 provide controls for reducing or eliminating the discharge of pollutants from the Service Department.** This is a violation of Part III.B.6.d.iii.2 of the Small MS4 NPDES Permit #OHQ000002 and Ohio Revised Code (ORC) 6111.04 and 6111.07. This violation was noted for the following operations at Service Department:
 - Failure to provide containment for the used oil tank and antifreeze drum stored outside of the garage. The leakage that has already occurred must be cleaned up and the area remediated.

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.

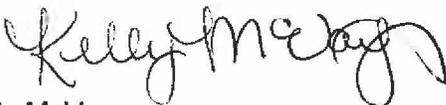
Deficiencies

- 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 New Annual Report form. In addition, the amount of street sweepings should be tracked separately from the amount of catch basin cleanings.
- 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 grounds maintenance, pesticide application, etc., 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 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 road maintenance staff, which is directly related to the jobs they perform and can be taken out with them in the field. By making materials available to staff at the field level, implementation of storm water BMPs should improve.

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.

Sincerely,



Kelly McVay
Assistant to the District Engineer
Division of Surface Water

KM/cs

cc: Ron Weidig, Director of Public Service, City of Brecksville
Sally Becker, City of Brecksville

ec: Dan Bogoevski, Ohio EPA, DSW, NEDO

Municipal Storm Water Program Evaluation

MS4 Maintenance Component Worksheet

Date of Evaluation	Tuesday, June 26, 2012
Evaluator Name, Title	Kelly McVay, DSW, NEDO
MS4 Permittee	City of Brecksville 3GQ00085*BG

Instructions: Use this worksheet as a guide for questioning MS4 staff and reviewing applicable documents. Keep in mind that additional questions may be necessary based on local regulations, MS4 permit requirements, implementation strategies, or water quality issues. Remember to obtain copies of any applicable documents or files, which may assist in writing the MS4 evaluation report.

Staff Interviewed		
Name	Department/Agency	Phone Number/Email
Gerry Wise City Engineer	City of Brecksville	sbecker@brecksville.oh.us
Ron Weidig Director of Public Service	City of Brecksville	rweidig@brecksville.oh.us
Sally Becker	City of Brecksville	Gwise@DGBAssoc.com

MS4 Mapping			
Interview Questions	Response		
Outfalls and receiving waters mapped?	YES		
Catch basins?	YES		
Pipes, ditches, other conduits?	YES		
Public stormwater facilities (BMPs)?	NO		
Private stormwater facilities (BMPs)?	NO		
How are maps used (i.e. tracking illicit discharges)?	The Board of Health screens outfalls for illicit discharges, then the City can go to their GIS mapping and print a map of the area to give to inspectors and the Building Department to track and find the illicit discharge.		
Applicable Documents		Reviewed	Obtained
Map(s) of MS4 system		YES	YES

Notes
<p>MS4 Mapping</p> <p>To meet the mapping obligations of NPDES Permit #OHQ000002, i.e., the MS4 permit in effect from 2009-2014, the map must show catch basins and publicly-owned storm sewers, ditches, conduits and storm water management facilities (including publicly-owned post-construction BMPs and underground retention). 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.</p>

Catch Basin Cleaning		
Interview Question	Response	
Schedule established for inspections and cleaning?	<p style="text-align: center;">YES</p> <p>The Service Department cleans the catch basins and tracks the streets which were done and how much material is removed. In 2011 they hit 310 of 1300 catch basins. The City tries to clean each basin once every 5 years.</p>	
Is cleaning and maintenance of catch basins tracked:	YES	
How are spoils materials disposed of?	<p>Spoils are taken to the Vehicle Storage building at the Service Center where they are decanted in the building. The drain in this building goes to sanitary sewer. All remaining material is then taken to Rumpke to go to a sanitary landfill.</p> <p>NOTE: Please ensure that these wastes are disposed at a solid waste landfill and not a construction and demolition debris landfill.</p>	
Are storm drain pipes inspected?	YES	
Proactive or only in response to blockage event?	The County repairs and cleans storm drain pipes occasionally, mainly in response to problems.	
Applicable Documents	Reviewed	Obtained
List of active municipal construction projects	YES	YES
<p>CHECK DATABASE BEFORE INSPECTION:</p> <p>List of municipal projects covered under the Ohio EPA general storm water NPDES permit for construction activities</p> <p style="text-align: center;">NONE</p> <p>NOTE: Permit is only required if project disturbs one or more acre (five or more acres for "routine maintenance")</p>		

Stormwater Management Facilities Operation and Maintenance			
Interview Questions	Response		
Public facilities inspected?	YES		
Frequency:	The City has three public facilities which are inspected on a yearly basis.		
Private facilities inspected?	YES		
Frequency:	Private facilities are inspected every other year. (Commercial one year, residential the next)		
Checklist used for inspections?	YES		
Have maintenance standards and procedures been established for these facilities?	YES Letters are issued to inform the owner of problems and necessary corrections. The City is working with residential facilities to improve enforcement and upkeep of these facilities.		
How is maintenance prioritized? Is data evaluated to target maintenance resources?	YES Typically the City just goes down the list to inspect these facilities. Maintenance would be prioritized by age of the online structure and by acreage.		
Applicable Documents		Reviewed	Obtained
Inspection checklist		YES	YES

Road Maintenance		
Interview Questions	Response	
Streets regularly swept?	YES	
Frequency:	The City tries to sweep each road at least three times per year.	
Frequency based on water quality factors (e.g. proximity to streams)?	NO	
How are spoils disposed of?	Same as catch basin cleanings described above.	
Does the community collect road kill?	YES	
What do they do with the carcasses?	Carcasses are taken straight to the sanitary landfill as soon as they are picked up.	
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.		

Road Maintenance	
Interview Questions	Response
<p>Does the community have a leaf collection program?</p> <p>What do they do with the collected leaves?</p> <p>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.</p>	<p>YES</p> <p>All leaves and yard wastes are taken directly to Rumpke. Rumpke transfer this material to Boyas for recycling. There is no leaf or yard waste storage on City property.</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>YES</p> <p>The City does minor curb repairs, apron repairs, paving, catch basin repairs, and saw cutting activities. The City contracts out larger projects. The City sweeps up after projects and tries to keep the site clean in general.</p>
<p>BMP guidance available to field staff?</p>	<p>YES</p> <p>Posters are hung in the back of the building and training materials are provided. The Rainwater Manual is also used by the City as a guidance tool.</p>
<p>Deicers used by MS4?</p>	<p>YES</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>YES</p> <p>Salt and brine are used as deicers. CaCl is used if the temperature gets low enough for it to be necessary, however, this is very rare.</p> <p>The City uses Sensible Salting practices, limits salt usage during the night shift and starts salting at rush hour, and only applies salts on curbs, hills, and intersections to minimize usage.</p>
<p>Sand/salt swept up after application?</p> <p>How soon?</p>	<p>YES</p> <p>The City uses newer equipment, so spills occur less at stops and intersections. As soon as a salt spill is noticed it is swept up and placed back in the shed.</p>
<p>Does your community operate a snow stockpile yard to store snow that has been removed from community streets and parking lots?</p>	<p>YES</p>

Road Maintenance			
Interview Questions		Response	
If YES, location of the yards:		Snow may be stockpiled at the Stadium Drive facility, where it is placed on cinder base of grindings, in a large snow event.	
Has your community considered implementing best management practices to control the discharge of pollutants from snowmelt associated with snow storage yards?		NO	
If YES, what BMPs have you implemented?		Because snow stockpiling is rarely done and the stockpiling yard rarely used, not many BMPs have been considered yet.	
Applicable Documents		Reviewed	Obtained
BMP guidance		YES	YES
Street sweeping records		YES	YES
Deicer application records		YES	YES

Notes
<p>Deicer Usage</p> <p>Please be aware that the Annual Report requires deicer usage 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, on a calendar year basis.</p>

Flood Management			
Interview Questions		Response	
Inventory of flood management structures completed?		YES	
Structures been assessed for stormwater retrofit?		The City only has one facility which is located on Edgerton Road and has included water quality considerations.	
New structures include water quality considerations?		YES	
Structures been assessed for stormwater retrofit?		The City is looking at some structures that are not theirs currently in hopes of taking them over and retrofitting them. The City is currently looking at retrofitting an existing lake and obtaining two private lakes to retrofit.	
Applicable Documents		Reviewed	Obtained
Inventory		YES	YES

Facilities Operation & Maintenance

Interview Questions	Response																										
Inventory of MS4 facilities complete (i.e. facilities owned and operated by the MS4)?	YES																										
<p><u>Types of facilities included</u> <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"> • Landfills Type: _____ • Airports • Shipping Ports or Marinas • Steam Electric Power Plants • Wastewater Treatment Plants ≥ 1 MGD or with a pretreatment program <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"> • Impound Lots • Leaf Collection Yards <ul style="list-style-type: none"> ✓ No discharge of leachate permitted • Maintenance Yards <ul style="list-style-type: none"> ➤ How many do they operate? <u> 3 </u> ➤ List facility names/locations: <div style="margin-left: 40px;"> <p>Service Department 9023 Brecksville Road</p> <p>Stadium Drive Service Facility 6916 Stadium Drive</p> <p>Blossom Hill Service Facility 4400 Oakes Road</p> </div> • Composting Operations <ul style="list-style-type: none"> ✓ No discharge of leachate permitted • Solid Waste Transfer Stations or Operations <ul style="list-style-type: none"> ✓ Under landfill permit if community owns the transfer station and the 	<table border="0" style="width: 100%;"> <thead> <tr> <th align="center"><u>Response</u></th> <th align="center"><u>SWP3 Developed?</u></th> </tr> </thead> <tbody> <tr> <td align="center">NO</td> <td align="center">N/A</td> </tr> </tbody> </table> <p>NOTE: No permit or SWP3 required if facility has no exposure. However, even if a No Exposure Certification has been submitted for the facility, inspect to verify validity.</p> <table border="0" style="width: 100%;"> <thead> <tr> <th align="center"><u>Response</u></th> <th align="center"><u>SWP3 Developed?</u></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> <tr> <td align="center">YES</td> <td align="center">YES</td> </tr> </tbody> </table> <table border="0" style="width: 100%;"> <thead> <tr> <th align="center"><u>Response</u></th> <th align="center"><u>SWP3 Developed?</u></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>	<u>Response</u>	<u>SWP3 Developed?</u>	NO	N/A	<u>Response</u>	<u>SWP3 Developed?</u>	NO	N/A	NO	N/A	YES	YES	<u>Response</u>	<u>SWP3 Developed?</u>	NO	N/A	NO	N/A								
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Facilities Operation & Maintenance

Interview Questions	Response
<p>landfill where waste will be taken</p> <p>✓ If not, then SWP3 is only needed if 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"> • Parks & Cemeteries <ul style="list-style-type: none"> ➢ How many in UA? <u> 8 </u> ➢ List facility names/locations: <p style="padding-left: 40px;">Cemetery at 9012 Highland Dr.</p> <p style="padding-left: 40px;">Cemetery at 8789 Riverview Rd.</p> <p style="padding-left: 40px;">Barr Road Cemetery</p> <p style="padding-left: 40px;">Fitzwater Road Cemetery</p> <p style="padding-left: 40px;">Blossom Hill Park 4400 Oakes Road</p> <p style="padding-left: 40px;">City Hall Park 9069 Brecksville Road</p> <p style="padding-left: 40px;">Community Center Park 1 Community Drive</p> <p style="padding-left: 40px;">Public Square Park</p> <ul style="list-style-type: none"> • Parking Lots <ul style="list-style-type: none"> ➢ How many do they operate? <u> 2 </u> ➢ List facility name/locations: <p style="padding-left: 40px;">9009 Brecksville Road Lot</p> <p style="padding-left: 40px;">3 Public Square Lot</p> <ul style="list-style-type: none"> • Bus Terminals • Vehicle Maintenance Garages <ul style="list-style-type: none"> ➢ How many do they operate? 3 ➢ List facility name/locations: 	<p align="center">YES</p> <p align="center">N/A</p> <p>All mower washing or maintenance is done at the Service Department for these facilities.</p> <p align="center">YES</p> <p align="center">N/A</p> <p align="center">NO</p> <p align="center">YES</p> <p align="center">N/A</p> <p align="center">YES</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>

Facilities Operation & Maintenance	
Interview Questions	Response
See Maintenance Yards list above.	
<p>Facilities inspected?</p> <p>NOTE: Go through list above where YES is response and write in answers for each activity.</p> <p>Frequency:</p> <p>NOTE: Go through list above where YES is response and write in answers for each activity.</p>	<p>YES</p> <p>Monthly visual inspections and an annual comprehensive inspection are done for each facility.</p>
<p>Checklist used?</p> <p>NOTE: Go through list above where YES is response and write in answers for each activity. Checklist should be part of SWP3.</p>	<p>YES</p>
<p>Staff which perform the inspections (department or agency):</p> <p>NOTE: Go through list above where YES is response and write in answers for each activity. Checklist should document name of inspector.</p>	<p>Blossom: Cite Manager (Jamie Still) Stadium: City Arborist (Charles Owen) Service Center: Assistant Foreman (Matt Thomas)</p> <p>All of the employees listed above have attended the yearly training and a couple of them have been sent to local good housekeeping workshops.</p>
<p>Is there a designated stormwater contact person for each facility?</p> <p>NOTE: 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>YES</p> <p>The three employees listed above are the contacts for their respective facilities. This matches the names in the SWP3.</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>Disciplinary action would be taken if someone was found to be in noncompliance. The enforcement procedure would go by the City's written policy.</p>
<p>Parking lots owned/operated by the permittee swept?</p>	<p>YES</p> <p>Parking lots are swept on the same cycle as the streets and sometimes before and after City events.</p>

Facilities Operation & Maintenance	
Interview Questions	Response
<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>NOTE: Some MS4s have banned the use of coal tar-based sealants in their communities. Research from the University of New Hampshire Stormwater Center and by the City of Austin, TX, has shown these sealants contaminate soil and runoff with PAHs and benzo(a)pyrene, a known carcinogen. If a sealant must be used, asphalt-based sealants are preferred.</p>	<p>YES</p> <p>NO</p> <p>No sealants used.</p>
<p>Do you have any combined sewer systems?</p> <p>If yes, do you have any combined sewer overflows?</p> <ul style="list-style-type: none"> ➤ How many? _____ ➤ Do you track frequency and volume? <p>Are you aware of any illicit cross connections between your sanitary sewer and MS4?</p> <p>If so, what is your plan to eliminate this illicit discharge?</p>	<p>NO</p> <p>NO</p> <p>YES</p> <p>The City has tried to eliminate all of the illicit discharges from the 2011 report. They plan to eliminate any which are remaining and are currently still being addressed as the City works with the Health Department to narrow down the investigation areas. Any cross connections which are found are fixed by order of the Building Department.</p>
<p>Have you investigated the extent of infiltration and inflow into storm sewer system?</p> <p>What methods have been used to conduct this investigation?</p> <p>What are your plans to repair and eliminate this source of illicit discharge?</p>	<p>NO</p> <p>The City has lined some sanitary sewers for this issue, but they have not investigated further than this. Repairs are generally made when problems arise and not proactively.</p>

Facilities Operation & Maintenance			
Interview Questions		Response	
Sewer spill and cleanup procedures in place?		YES There are two sewer discharges that the City is aware of. Both belong to the County and are in the process of being abandoned.	
Applicable Documents		Reviewed	Obtained
Facility inventory		YES	YES
Facility SWPPP		YES	YES

Pesticides, Herbicides & Fertilizers			
Interview Questions		Response	
Certified applicators used?		YES	
Integrated Pest Management (IPM) practices used?		YES	
Storage location of pesticides, herbicides, and fertilizers:		All of these materials are stored at the Stadium Drive Service Facility in a locked area.	
BMPs used during application:		Minimal application is done by the City. They blow loose material back onto area where it was meant to be applied if they miss and only use pesticides for harmful species.	
Fertilizer/pesticide application plan utilized?		NO	
Applicable Documents		Reviewed	Obtained
Fertilizer/pesticide application plan		NONE	NONE

Notes
<p>Application Plan</p> <p>There are 3 certified applicators in the Horticulture Department. The City does very little fertilizing and prefers to contract most fertilizing out. Pesticides are used by the City only selectively on harmful species to minimize usage. The most appropriate technique is used given the type of pest and application occurs at a specific point in the pest's lifecycle which is determined to be the most effective time to apply to minimize usage and do the job.</p> <p>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 <i>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.</i></p> <p>Please provide me with a copy of the City's pesticide, herbicide and fertilizer application plan.</p>

Notes

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; and
- 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; and
- 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. 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?	YES The Rainwater Manual and brochures from CSWCD are available for reference.
MS4 use contractual staff to complete MS4 maintenance activities?	YES



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- 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 road maintenance staff, which is directly related to the jobs they perform and can be taken out with them in the field. By making materials available to staff at the field level, implementation of storm water BMPs should improve.

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.

Sincerely,



Kelly McVay
Assistant to the District Engineer
Division of Surface Water

KM/cs

cc: Ron Weidig, Director of Public Service, City of Brecksville
Sally Becker, City of Brecksville

ec: Dan Bogoevski, Ohio EPA, DSW, NEDO