



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

July 10, 2012

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

Gary Kopchak
Storm Water Program Coordinator
City of Brook Park
19065 Holland Road
Brook Park, OH 44142

Dear Mr. Kopchak:

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 Monday, July 2, 2012, Ohio EPA met with you and Brian McTaggart of the City of Brook Park to determine compliance with the NPDES permit and the 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 submit a Notice of Termination (NOT) within 45 days of reaching final stabilization on municipal construction projects.** This is a violation of Part IV.A of NPDES permit #OHC000003. Our records show that the City of Brook Park has three active projects permitted under the Ohio EPA General Storm Water NPDES Permit for Construction Activities but it was indicated during the interview that two of these three projects were completed and have reached final stabilization. Please submit an NOT for both of these completed projects (see attachments for the list of projects).
- **Failure to develop and implement a Storm Water Pollution Prevention Plan (SWP3) for the Service Center, Main Fire Station, and Fire Station #2 (West End).** This is a violation of Part III.B.6.d.iii.2 of the NPDES Permit and Ohio Revised Code (ORC) 6111.04 and 6111.07. The NPDES permit #OHQ000002 required SWP3s to be developed and implemented at these facilities within two years of NPDES permit renewal, i.e., June 3, 2011. The SWP3s need to include a comprehensive site

evaluation to be completed at least once a year. Any deficiencies in the SWP3 or in the implemented BMPs revealed by the inspection should be recorded and the SWP3 must be revised to correct the problems. The SWP3 should also identify the responsible party for site inspections, and designate a storm water contact person for the facility. A site map is also part of an industrial SWP3, identifying the drainage of all storm water as well as any potential pollutant sources. The NPDES permit #OHQ000002 required SWP3s to be developed and implemented at these facilities within two years of NPDES permit renewal, i.e., June 3, 2011.

- **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. The City has not developed or adopted checklists for inspections of other types of post-construction BMPs. 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.
- **Failure to provide controls for reducing or eliminating the discharge of pollutants from the Service Center.** 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 the Service Center:
 - Failure to prevent the discharge of wastewater from the washing of painting materials for the ball fields.
 - Failure to implement sediment controls around material stockpiles, e.g. sand, topsoil, mulch, stone, and grinding piles throughout the service yard.
 - Failure to provide containment for hazardous materials, e.g. full barrels, paint buckets, old kerosene tanks and open asphalt sealer containers, all stored outside the Service Center, exposed to the elements. Any leakage, which has already occurred, must be cleaned up and the area remediated.

Further, the City was noted for failure to prevent the discharge of wastewater from vehicle washing to the MS4 at the Main Fire Station, as they indicated that they sometimes wash vehicles outdoors.

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 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 a consulting engineer to conduct parts of the Construction, Post-Construction and Illicit Discharge programs and the Cuyahoga County Board of Health to conduct parts of the Construction, Illicit Discharge, and Pollution Prevention/Good Housekeeping programs for municipal operations on its behalf. During our interview, the City could not produce any written agreements with the consulting engineer or the Board of Health. 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 has not developed checklists to inspect the Service Center or Fire Stations. 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 needs to track salt usage 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.
- 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 fertilizer/herbicide/pesticide application, 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 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.

CITY OF BROOK PARK
JULY 10, 2012
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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,

A handwritten signature in black ink that reads "Kelly McVay". The signature is written in a cursive style with a large, looping "K" and "M".

Kelly McVay
Assistant to the District Engineer
Division of Surface Water

KM/cs

cc: Mark J. Elliot, Mayor, City of Brook Park
Brian McTaggart, Deputy Service Director, City of Brook Park

ec: Dan Bogoevski, Ohio EPA, DSW, NEDO

Municipal Storm Water Program Evaluation

MS4 Maintenance Component Worksheet

Date of Evaluation Monday, July 2, 2012
Evaluator Name, Title Kelly McVay, DSW, NEDO
MS4 Permittee City of Brook Park 3GQ00115*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
Gary Kopchak Acting Service Director	City of Brook Park	(216) 433-7187 gkopchak@cityofbrookpark.com
Brian C. McTaggart Deputy Service Director	City of Brook Park	(216) 433-7188 bmctaggart@cityofbrookpark.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)?	Maps are used to find problems. The maps help to track and storm water issues at outfalls upstream to find their origins.	
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 <i>catch basins</i> and <i>publicly-owned storm sewers, ditches, conduits</i> and storm water management facilities (including <i>publicly-owned post-construction BMPs and underground retention</i>). In addition, the map must show <i>privately-owned storm water management facilities</i> constructed as post-construction BMPs for new development or redevelopment which has occurred since April 21, 2003.</p>

Notes

Illicit Discharge Detection

The City purchased a camera truck but has not yet found any illicit connections from sanitary to storm sewer. The City is reminded that any illicit cross-connections which are discovered, but not yet eliminated, must be reported to Ohio EPA each year in the MS4 Annual Report. In addition, the City must provide a plan with timetable for the elimination of illicit cross-connections that have not yet been eliminated.

On the 2011 Annual Report, the City states that there were 5 identified illicit discharges in 2011. The City believes that all but one of these discharges has been eliminated. The remaining case is related to a residential basement drain which is connected to storm. The City is working on obtaining permission to enter in order to dye test this drain and disconnect it if it is found to connect to storm sewer.

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 HSTSs 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?	YES The entire City was gone over last year.
Is cleaning and maintenance of catch basins tracked:	YES The City started tracking and recording what is removed from catch basins and City streets this year.
How are spoils materials disposed of?	Spoils are placed on a decanting pad at the Service Department. Republic hauls these spoils off site from there. NOTE: 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? Proactive or only in response to blockage event?	YES Only in response to blockage events.

Applicable Documents	Reviewed	Obtained
List of active municipal construction projects	YES	YES
CHECK DATABASE BEFORE INSPECTION:		
List of municipal projects covered under the Ohio EPA general storm water NPDES permit for construction activities		

3GC05464*AG - Heatherwood Drive Reconstruction Project *NOT	DONE - FILE NOT
3GC03377*AG - CUY-West 150 th Street *active	DONE - FILE NOT
3GC03134*AG - Snow Road/CSX Grade Separation *NOT	ACTIVE
NOTE: Permit is only required if project disturbs 1 or more acre (5 or more acres for "routine maintenance")	

Notes
<u>MS4 System Repair and Maintenance</u> 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.
<u>Municipal Construction Projects</u> If construction is complete or the project is no longer viable, please submit Notices of Termination (NOTs) for these projects to close out NPDES permit coverage. The NOT and instructions can be obtained on the Ohio EPA Storm Water Program webpage at www.epa.ohio.gov/dsw/storm/stormform.aspx . As a reminder, coverage under the Ohio EPA General Storm Water NPDES Permit for Construction Activities is to be terminated within 45 days of when the project reaches final stabilization. Please be sure to incorporate this requirement into your procedures on all future projects.

Stormwater Management Facilities Operation and Maintenance		
Interview Questions	Response	
Public facilities inspected? Frequency:	NO	
Private facilities inspected? Frequency:	NO	
Checklist used for inspections?	NO	
Have maintenance standards and procedures been established for these facilities?	NO	
How is maintenance prioritized? Is data evaluated to target maintenance resources?	NO	
Applicable Documents	Reviewed	Obtained
Inspection checklist	NONE	NONE

Notes
<u>Inventory</u> Most drainage from the City goes downstream to a large retention basin in the City of Cleveland. The City of Brook Park initially indicated that they did not have any storm water

management facilities. However, upon further discussion during the field inspections, we found that at least one private storm water management facility exists. An inventory of public/private-owned stormwater management facilities built since April 21, 2003 is part of the mapping requirements of NPDES permit #OHQ000002. This inventory must be completed by the end of this permit term, i.e., January 2014.

Inspections of Stormwater Management Facilities

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>.

(**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.

Road Maintenance	
Interview Questions	Response
Streets regularly swept?	YES

Road Maintenance	
Interview Questions	Response
Frequency:	Each street is swept at least 3-4 times per year. The City just got rid of their sweeper and is now sharing a vehicle with the City of Berea and the City of Parma Heights, so availability for sweeping varies.
Frequency based on water quality factors (e.g. proximity to streams)?	NO
How are spoils disposed of?	Spoils are kept separate from the catch basin cleanings, but disposed of in the same way as described above.
Does the community collect road kill? What do they do with the carcasses? 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.	YES Western Farm Burial removes deer carcasses and disposes of them for City as needed. Smaller animal carcasses, which are managed by the Animal Warden, are frozen and stored in a freezer until they can be picked up by Western Farm Burial.
Does the community have a leaf collection program? What do they do with the collected leaves? NOTE: Landfills have been banned from accepting yard waste, so MS4 cannot place leaves and yard waste in dumpster. Must be composted at a licensed Class IV composting facility. Communities may temporarily store leaves awaiting transport to a composting facility but leachate must be prevented from discharging.	YES The leaf collection program is a joint venture with Middleburg Heights. Collected leaves are stored at a facility in Middleburgh Heights on Sheldon Road. Leaves are taken to Kurtz Brothers from there for composting.
BMPs used during road maintenance activities? Describe types of road maintenance conducted by community staff and the BMPs used	YES The City does asphalt repairs, small concrete repairs, and water breaks along with other small repairs. The City contracts out larger projects in a bidding process. Some BMPs used in City projects include providing inlet protection for nearby catch basins and sweeping up after any cutting processes.
BMP guidance available to field staff?	NO Only verbal guidance has been provided to maintenance staff.

Road Maintenance		
Interview Questions	Response	
Deicers used by MS4?	YES	
Type and amount of deicer and additives tracked?	YES	
What measures are being taken to minimize the application of deicers?	Salt is the only deicer used by the City. To minimize application the City spot salts. They only salt at stop signs and intersections typically. The City has noticeably reduced their salt usage in recent years by not salting every road after every storm.	
Sand/salt swept up after application?	YES	
How soon?	At the end of the day spills are swept up.	
Does your community operate a snow stockpile yard to store snow that has been removed from community streets and parking lots?	NO	
If YES, location of the yards:	N/A	
Has your community considered implementing best management practices to control the discharge of pollutants from snowmelt associated with snow storage yards?	N/A	
If YES, what BMPs have you implemented?	N/A	
Applicable Documents	Reviewed	Obtained
BMP guidance	NONE	NONE
Street sweeping records	YES	YES
Deicer application records	YES	YES

Notes

Deicer Usage

Please be aware that the Annual Report requires information to be reported on a January to December calendar year basis. Please be sure to report the total salt used 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. 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.

Flood Management		
Interview Questions	Response	
Inventory of flood management structures completed?	YES Storage tanks are used as flood management. A list of these tanks was provided.	
Structures been assessed for stormwater retrofit?	NO	
New structures include water quality considerations?	The City was unsure whether or not the Shelby Road basin, which is in the planning stages, is considering water quality.	
Applicable Documents	Reviewed	Obtained
Inventory	YES	YES

Notes

Stormwater Retrofits

The City has storage tanks throughout the City to manage floodwater. These tanks are pumped out once the storm event is over so that the system is not taxed.

The City is currently considering installing a retention basin off of Shelby Road to help with flooding problems. This project is still in the planning stages and the City did not know whether water quality was being considered in the design or not.

The City's public stormwater management facilities should be looked at for possible retrofit opportunities so that they treat the Water Quality Volume (WQv). The current MS4 permit (OHQ000002) does not require the City to implement retrofit projects, but they are an important piece of the storm water management puzzle for older, developed parts of the community. Current post-construction requirements only affect areas where new development or redevelopment disturbs one or more acre of land. This program will not create BMPs in previously-developed areas unless they are being redeveloped and the one-acre threshold is met. As such, US EPA is evaluating whether retrofits should be required in future generations of the MS4 permit.

It is important to look for retrofit opportunities by making a list of potential water quality enhancement projects and focusing on the implementation of green infrastructure. Typically, retrofitting the outlet structures of existing detention and retention basins to provide extended detention of the WQv is the easiest and most feasible type of retrofit project. However, **preferred retrofit projects include installing bioretention cells in existing parking lots or along residential streets, resurfacing with permeable pavement and establishing incentive programs for rain gardens, rain barrels and other forms of downspout disconnection in residential neighborhoods.**

Facilities Operation & Maintenance

Interview Questions

Response

Inventory of MS4 facilities complete (i.e. facilities owned and operated by the MS4)?

YES

Types of facilities included

These need their own NPDES storm water permit for industrial activities, if there is a discharge of runoff from these operations:

- Landfills
Type: _____
- Airports
- Shipping Ports or Marinas
- Steam Electric Power Plants
- Wastewater Treatment Plants ≥ 1 MGD or with a pretreatment program

<u>Response</u>	<u>SWP3 Developed?</u>
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NO	N/A

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.

These do not need their own permit, but do have to develop an SWP3 unless noted as N/A:

- Impound Lots
- Leaf Collection Yards
 - ✓ No discharge of leachate permitted
- Maintenance Yards
 - How many do they operate?
1
 - List facility names/locations:

<u>Response</u>	<u>SWP3 Developed?</u>
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NO	N/A
NO	N/A
YES	NO

Service Center
19065 Holland Rd.

<u>Response</u>	<u>SWP3 Developed?</u>
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- Composting Operations
 - ✓ No discharge of leachate permitted
- Solid Waste Transfer Stations or Operations
 - ✓ Under landfill permit if community owns the transfer station and the landfill where waste will be taken
 - ✓ 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

NO	N/A
NO	N/A
YES	N/A

Facilities Operation & Maintenance	
Interview Questions	Response
<p><u>3</u></p> <p>➤ List facility name/locations:</p> <p>Service Center 19065 Holland Rd.</p> <p>Main Fire Station 17401 Holland Rd.</p> <p>Fire Station #2 (West End) 22530 Ruple Parkway</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>
<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>NO</p> <p>No formal inspections have been conducted.</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>NO</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>No inspections performed.</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>NO</p> <p>No SWP3s exist.</p>
<p>Describe enforcement procedures used to address noncompliance on a MS4-owned facility, i.e., what disciplinary measures are taken against those that do not implement standard operating procedures?</p>	<p>The City goes by union rules. This includes a verbal and written warning before further action.</p>

Facilities Operation & Maintenance	
Interview Questions	Response
<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>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>Parking lots attached to City buildings are swept 3-4 times a year.</p> <p>YES</p> <p>YES</p> <p>The City uses Kold Flo sealant when they do asphalt repairs to seal joints. The City believes that this is a coal tar based product. It was suggested that this sealant no longer be used if it is coal tar-based. However, upon doing some research on the product, their website says:</p> <p>"Kold Flo is an asphalt emulsion based material modified with latex and fillers. KoldFlo can be used on asphalt or concrete pavement as a asphalt crack filler material."</p> <p>This indicates that it is asphalt, not coal tar based.</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>N/A</p> <p>NO</p> <p>No illicit cross connections have been found involving sanitary lines being connected to storm sewer. There have been some connections found between downspouts and the sanitary sewer, which are being corrected. The City plans to eliminate any illicit discharges in the future using dye and smoke tests.</p>
<p>Have you investigated the extent of infiltration</p>	<p>YES</p>

Facilities Operation & Maintenance			
Interview Questions		Response	
and inflow into storm sewer system?			
What methods have been used to conduct this investigation?		The City recently purchased a camera truck, which they have used to camera the main sewer lines for inspection of cracks and other problems.	
What are your plans to repair and eliminate this source of illicit discharge?		Replace pipes if needed.	
Sewer spill and cleanup procedures in place?		NO	
Applicable Documents		Reviewed	Obtained
Facility inventory		YES	YES
Facility SWPPP		NONE	NONE

Notes

Storm Water Pollution Prevention Plans (SWP3s)

A Storm Water Pollution Prevention Plan (SWP3) must be developed and implemented for the following facilities:

- Service Center
- Main Fire Station
- Fire Station #2 (West End)

The Ohio EPA General Storm Water NPDES Permit for Small MS4s #OHQ000002 requires the City of Brook Park to develop and begin implementing the SWP3 for these facilities within 2 years of permit renewal, i.e., by June 2011.

The City indicated that vehicle washing occurs at the Fire Stations which would require a SWP3 to be developed for these facilities. However, it appeared that the Fire Stations may be eligible to obtain No Exposure status as long as all washing activities occur inside where water is discharged to sanitary sewer. If the Fire Stations are deemed as eligible No Exposure sites, no SWP3 is required and a No Exposure Certification form must be filled out and kept in the City's files. More information on this can be found on the field inspection worksheets for these facilities.

The above facilities must be inspected at a frequency specified in the SWP3. Ohio EPA recommends that facilities be inspected monthly. A comprehensive site evaluation must be conducted at least once per year and a record of that inspection and its findings must be kept with the SWP3. If this annual inspection reveals deficiencies in the SWP3 or BMPs that are ineffective, the SWP3 must be revised to correct the problems. The SWP3 should contain a checklist to provide consistency to facility inspections. The SWP3 should also identify who is responsible for facility inspections as well as a storm water contact person for the facility. For guidance on developing a **site map**, please reference Ohio EPA General Storm Water NPDES Permit for Industrial Activities #OHR000005 **Part 5.1.2s**. Also refer to the following website for information on developing SWP3s for these facilities:
http://www.epa.ohio.gov/dsw/permits/GP_IndustrialStormWater.aspx

Pesticides, Herbicides & Fertilizers			
Interview Questions		Response	
Certified applicators used?		YES	
Integrated Pest Management (IPM) practices used?		YES	
Storage location of pesticides, herbicides, and fertilizers:		No pesticides, herbicides, or fertilizers are stored at City facilities.	
BMPs used during application:		The City does not apply any pesticides, herbicides, or fertilizers. It is all contracted out.	
Fertilizer/pesticide application plan utilized?		N/A	
Applicable Documents		Reviewed	Obtained
Fertilizer/pesticide application plan		N/A	N/A

Notes

Pesticide, Herbicide and Fertilizer Application

The City of Brook Park contracts out all pesticide, herbicide, and fertilizer application to Meehan's Lawn Service and the County. No chemical storage or application of this nature is done by the City.

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 The City contracts out larger construction projects and fertilizing.
BMP guidance materials provided to contracted staff?	NO
Requirement to consider stormwater impacts and utilize appropriate BMPs in contracts?	NO
Materials used to educate the public regarding stormwater impacts on MS4 property (if applicable, i.e. public spaces):	Pet waste: No dogs are allowed at City parks. Litter reduction: The parks have signs notifying citizens of the fines for littering. It was suggested that signage be added to trash bins to tie the problem into water quality.

Standards, BMPs, & Outreach		
Interview Questions	Response	
Applicable Documents	Reviewed	Obtained
BMP manual or guidance document	NONE	NONE
Contract language for MS4 operation and maintenance activities	NONE	NONE

Notes
<p>Technical Guidance and Specifications for Maintenance Staff</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. Once prepared, the City will need to train staff on the SWP3 for the Service Center and Fire Stations 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 (e.g., <i>prohibiting the Fire Department from washing vehicles outside and providing inlet protection at parks with baseball diamonds etc.</i>). Existing guidance manuals you may find useful to meet this goal include the Rainwater and Land Development manual (ODNR, 2006) and the Municipal Pollution Prevention/Good Housekeeping Manual #9 (Center for Watershed Protection, September 2008). This manual is available as a free download on their website at http://www.cwp.org/formmaker/Download-Form_RedirectFormPage.html.</p> <p>Contracted Staff</p> <p>Contracted staff include fertilizing and road construction crews. 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. The contracts, with Meehan's Lawn Service and for a construction project, provided did not specifically address storm water impacts or the requirements for pollution controls.</p>

Staff Education and Training		
Interview Questions	Response	
Staff trained to identify potential storm water pollution sources, which would result in an illicit discharge?	YES	
Frequency:	Training is done annually for all Service Department staff.	
Materials used to train staff:	The County Board of Health does a complete presentation on storm water with a video and verbal instruction.	
Applicable Documents	Reviewed	Obtained
Training materials	YES	YES

Notes

FIELD INSPECTION WORKSHEET
 MS4 SWMP Evaluation
 MS4 Maintenance Facility Field Inspection Worksheet

Permittee: City of Brook Park – Service Center	
Address of facility: 19065 Holland Road	Size of facility: 9 acres
Date of visit: 7/2/2012	Time of visit: 10:00am
Provide the name(s) and title(s) of permittee staff present during inspection	
Name	Title
<i>Brian McTaggart</i>	<i>Deputy Service Director</i>
Evaluator Observations:	
SWPPP or stormwater plan	
Has the maintenance facility developed a SWPPP or stormwater plan?	NO
Does the plan include a site map, list of pollutant sources, BMPs, and maintenance procedures?	No plan provided.
Does the permittee conduct and document periodic inspections of the facility?	NO
Are storm drains labeled and free of debris?	Drains were not labeled.
Vehicle maintenance, fueling and washing	
Are vehicle maintenance activities conducted in a designated place not exposed to stormwater?	YES , all vehicle maintenance is done in the garage where drains lead to an oil water separator, which is connected to sanitary sewer.
Are fueling stations properly designed with spill kits nearby?	The fueling station was equipped with automatic shutoff valves and an emergency shut off button. It was recommended that a sign be added labeling the emergency shut off button. There was no spill kit nearby. A spill kit should be assembled and placed near this fueling station.
Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer?	Vehicles are washed in a bay in the main service garage where the drain goes to sanitary sewer. Painting machinery from the ball fields had been washed outside of the main service garage and had left white stains on the cement. This is not an acceptable practice. Wash water is a wastewater and cannot be discharged to your MS4. These materials must be washed indoors where the drains are connected to sanitary sewer.
Material storage	
Are all materials that are potential stormwater contaminants stored under cover or in secondary containment?	Some staining was present around the snow plow storage area. Hydraulic lines should be bagged or connected together to prevent any leakage of fluids. Salt and other materials stored on the northwest side of the facility appeared to have trailed to the nearby store drain in the past.

Hazardous waste management	
Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff?	<p>Most hazardous materials are stored inside the main service garage in an explosion room. They are kept off the ground and where there is no exposure to storm water runoff.</p> <p>Drums of Kold-Flo, pain, and kerosene were open and outdoors, exposed to the elements. Some of these items appeared to have had overflows in the past. These items cannot be stored outside. Only closed drums which are in good condition may be kept outdoors. Any open drums must be put indoors within secondary containment and all spills cleaned up appropriately.</p>
Waste management	
Are waste bins covered with waste properly disposed in containers?	No waste bins were seen on site. Trash removal occurs nearly daily so no dumpsters area necessary.
How is landscape waste stored?	No landscape waste is stored on site. All landscape waste is taken to Kurtz Brothers.
Spill response	
Does the facility have a spill response plan, and are spill kits readily available?	Spill kits should be placed in more areas where they may be needed, such as by the fueling station and household waste drop off area.
Employee training	
What type of stormwater training does maintenance staff receive?	Employees take part in the annual training held by the Board of Health as described in the interview worksheet.
Notes or additional information:	
<p><u>Road Paint Storage and Cleanout</u> Empty drums from road paint were stored outside of the maintenance garage. As long as these drums are closed and in good condition, they may be stored outside. Open drums or buckets of paint should be stored within secondary containment or indoors to prevent the accumulation of water and potential of overflow.</p> <p>Further, it appeared that paint machines may have been emptied out behind the maintenance garage parking lot, as paint was splattered on the earthen ground. Excess paint cannot be sprayed out onto the ground. As discussed, this material could be sprayed into a bin or drum to better contain the paint and reduce the potential for runoff to be contaminated.</p>	
<p><u>Spill Kits</u> Oil dry material was available inside the service garage. It was recommended that spill kits be placed near the fueling station and household waste drop off areas as these are high traffic areas with a high risk of spills. A mat should be provided in this kit to cover the nearby storm drains should a spill occur.</p>	
<p><u>Materials Storage</u> Sand, gindings, and mulch were all stored on the northwest side of the facility. Some signs of sediment trailing to the nearby storm drain were visible. These materials should be covered or bermed to prevent the discharge of sediment laden runoff or leachate. Also, a small amount of staining from salt runoff was present although all materials seemed to be kept under cover fairly well. It was recommended that a berm</p>	

or hay bails be used to better contain salt to its building.

Storm Water Pollution Prevention Plan (SWP3)

The City of Brook Park is required to develop a SWP3 for this facility. The SWP3 must contain a map indicating the location of potential pollutant sources, the control measures (best management practices) implemented to minimize or eliminate the discharge of pollutants, and the drainage systems and patterns. The City should show all catch basins, storm sewers and points of discharge for storm water from this facility and delineate drainage areas to each outfall. Refer to Part 5.1 of the Ohio EPA General NPDES Permit for Industrial Activities #OHR000005 to determine other required content of the SWP3. This permit can be downloaded from our website at http://www.epa.ohio.gov/dsw/permits/GP_IndustrialStormWater.aspx. In developing the SWP3, the City must evaluate where all water is draining throughout the facility, including an assessment of non-storm water discharges. The goal is to certify that there are no illicit discharges from the facility to the MS4.

INSPECTION PHOTOS

Service Center

City of Brook Park

Photos Taken: July 2, 2012



Fig. 1: Oil and paint staining appeared on the cement behind the main service garage building and trailed towards a storm drain in the parking lot. Painting machinery from the ball fields was washed out in this area. This is not an acceptable practice.



Fig. 2: Empty drums from road paint were stored outside while waiting for pick up. Some open buckets were seen in this area and cannot be kept exposed.



Fig. 3: Some signs of leakage were present around the snow plow storage area.

Fig. 4: Road paint spilled on the earth behind the maintenance garage.



Fig. 5 & 6: This drum was open and uncovered in the southwest corner of the facility. Water had accumulated inside and no containment was provided.



Fig. 7: Used kerosene drums were left open and exposed to the elements. Water had collected in these drums due to this. This is not an acceptable storage practice.

Fig. 8: Staining on the cement around the facility indicated vehicles and equipment have leaked. Be sure to clean up any spills or leaks as soon as they are noticed and implement the use of drip pans to help collect such fluids.



Fig. 9: Small amounts of salt were starting to trail out of their containment areas and some white trailing indicated runoff containing salt had reached the nearby storm drain. As discussed, it would be a good BMP to add a berm or hay bails to better confine the salt to its covered area.

Fig. 10: Grindings and sand were stored in these bays. Some sediment trailing was seen leading to the nearby storm drain. It is recommended that these piles be covered to prevent the discharge of sediment to your MS4.



Fig. 11 & 12: Piles of mulch and other materials should be covered to prevent the discharge of sediment laden runoff or leachate.



Fig. 13: Some sediment had accumulated around the storm drain near the materials and salt storage area. Better secondary containment and covering of this material should alleviate this issue.

Fig. 14: These are the household waste drop off bins. It was suggested that a spill kit be added to this area.



Fig. 14 & 15: The decanting pad where catch basin cleanings and street sweeping spoils are placed. As discussed, the roll-off bins of this material should be covered to prevent the formation of leachate.



Fig. 16 & 17: The drum of Kold Flo, used for road patching, was open and exposed to the elements. Staining indicated a spill or overflow had occurred. Open drums must be stored indoors or within secondary containment.

FIELD INSPECTION WORKSHEET
 MS4 SWMP Evaluation
 MS4 Maintenance Facility Field Inspection Worksheet

Permittee: City of Brook Park – Main Fire Station	
Address of facility: 17401 Holland Road	Size of facility: 1 acre
Date of visit: 7/2/2012	Time of visit: 11:00am
Provide the name(s) and title(s) of permittee staff present during inspection	
Name	Title
<i>Brian McTaggart</i>	<i>Deputy Service Director</i>
Evaluator Observations:	
SWPPP or stormwater plan	
Has the maintenance facility developed a SWPPP or stormwater plan?	NO
Does the plan include a site map, list of pollutant sources, BMPs, and maintenance procedures?	No plan provided.
Does the permittee conduct and document periodic inspections of the facility?	NO
Are storm drains labeled and free of debris?	Drains were not labeled.
Vehicle maintenance, fueling and washing	
Are vehicle maintenance activities conducted in a designated place not exposed to stormwater?	No maintenance is done on site. All maintenance is done at the Service Center.
Are fueling stations properly designed with spill kits nearby?	No fueling stations on site. All fueling is done at the Service Center.
Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer?	Vehicles are washed mainly in the building where drains are connected to sanitary sewer. Vehicles are sometimes washed outside over a storm drain. This wash water is a wastewater which cannot be discharged to the MS4. Vehicles must be washed indoors where water can drain to sanitary sewer.
Material storage	
Are all materials that are potential stormwater contaminants stored under cover or in secondary containment?	YES
Hazardous waste management	
Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff?	YES
Waste management	
Are waste bins covered with waste properly disposed in containers?	No waste bins were seen on site. Trash removal occurs nearly daily so no dumpsters area necessary.
How is landscape waste stored?	No landscape waste is stored on site. All landscape waste is taken to Kurtz Brothers.
Spill response	
Does the facility have a spill response plan, and are spill kits readily available?	YES
Employee training	
What type of stormwater training does maintenance staff receive?	The Fire Stations do their own training which is not with the Service Department. Mr. McTaggart was unsure whether or not they did any storm water specific training and no documentation could be

provided proving otherwise. Employee training on storm water pollution prevention practices and identifying pollution sources must be provided to these employees.

Notes or additional information:

No Exposure Exemption

The City indicated that vehicle washing occurs at this facility, which would require a SWP3 to be developed. However, it appeared that the Main Fire Station may be eligible to obtain No Exposure status, as long as all washing activities occur inside. If deemed as an eligible No Exposure site, no SWP3 is required and a No Exposure Certification form must be filled out and kept in the City's files. This form, which includes a checklist of requirements, and more information can be found at:

http://epa.ohio.gov/dsw/storm/stormform.aspx#no_exposure_certification

Storm Water Pollution Prevention Plan (SWP3)

If not eligible for No Exposure status or if the City does not wish to obtain this certification, the City of Brook Park is then required to develop a SWP3 for this facility. The SWP3 must contain a map indicating the location of potential pollutant sources, the control measures (best management practices) implemented to minimize or eliminate the discharge of pollutants, and the drainage systems and patterns. The City should show all catch basins, storm sewers and points of discharge for storm water from this facility and delineate drainage areas to each outfall. Refer to Part 5.1 of the Ohio EPA General NPDES Permit for Industrial Activities #OHR000005 to determine other required content of the SWP3. This permit can be downloaded from our website at http://www.epa.ohio.gov/dsw/permits/GP_IndustrialStormWater.aspx. In developing the SWP3, the City must evaluate where all water is draining throughout the facility, including an assessment of non-storm water discharges. The goal is to certify that there are no illicit discharges from the facility to the MS4.

FIELD INSPECTION WORKSHEET
 MS4 SWMP Evaluation
 MS4 Maintenance Facility Field Inspection Worksheet

Permittee: City of Brook Park – Fire Station #2 (West End)	
Address of facility: 22530 Ruple Parkway	Size of facility: ½ acre
Date of visit: 7/2/2012	Time of visit: 10:45am
Provide the name(s) and title(s) of permittee staff present during inspection	
Name	Title
<i>Brian McTaggart</i>	<i>Deputy Service Director</i>
Evaluator Observations:	
SWPPP or stormwater plan	
Has the maintenance facility developed a SWPPP or stormwater plan?	NO
Does the plan include a site map, list of pollutant sources, BMPs, and maintenance procedures?	No plan provided.
Does the permittee conduct and document periodic inspections of the facility?	NO
Are storm drains labeled and free of debris?	Drains were not labeled.
Vehicle maintenance, fueling and washing	
Are vehicle maintenance activities conducted in a designated place not exposed to stormwater?	No maintenance is done on site. All maintenance is done at the Service Center.
Are fueling stations properly designed with spill kits nearby?	No fueling stations on site. All fueling is done at the Service Center.
Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer?	YES , all vehicles are washed inside the building where drains are connected to sanitary sewer.
Material storage	
Are all materials that are potential stormwater contaminants stored under cover or in secondary containment?	YES
Hazardous waste management	
Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff?	YES
Waste management	
Are waste bins covered with waste properly disposed in containers?	No waste bins were seen on site. Trash removal occurs nearly daily so no dumpsters area necessary.
How is landscape waste stored?	No landscape waste is stored on site. All landscape waste is taken to Kurtz Brothers.
Spill response	
Does the facility have a spill response plan, and are spill kits readily available?	YES
Employee training	
What type of stormwater training does maintenance staff receive?	The Fire Stations do their own training which is not with the Service Department. Mr. McTaggart was unsure whether or not they did any storm water specific training and no documentation could be provided proving otherwise. Employee training on storm water pollution prevention practices and identifying pollution sources must be provided to these employees.

Notes or additional information:

No Exposure Exemption

The City indicated that vehicle washing occurs at this facility, which would require a SWP3 to be developed. However, it appeared that the West End Fire Station may be eligible to obtain No Exposure status, as long as all washing activities occur inside. If deemed as an eligible No Exposure site, no SWP3 is required and a No Exposure Certification form must be filled out and kept in the City's files. This form, which includes a checklist of requirements, and more information can be found at:

http://epa.ohio.gov/dsw/storm/stormform.aspx#no_exposure_certification

Storm Water Pollution Prevention Plan (SWP3)

If not eligible for No Exposure status or if the City does not wish to obtain this certification, the City of Brook Park is then required to develop a SWP3 for this facility. The SWP3 must contain a map indicating the location of potential pollutant sources, the control measures (best management practices) implemented to minimize or eliminate the discharge of pollutants, and the drainage systems and patterns. The City should show all catch basins, storm sewers and points of discharge for storm water from this facility and delineate drainage areas to each outfall. Refer to Part 5.1 of the Ohio EPA General NPDES Permit for Industrial Activities #OHR000005 to determine other required content of the SWP3. This permit can be downloaded from our website at http://www.epa.ohio.gov/dsw/permits/GP_IndustrialStormWater.aspx. In developing the SWP3, the City must evaluate where all water is draining throughout the facility, including an assessment of non-storm water discharges. The goal is to certify that there are no illicit discharges from the facility to the MS4.