

Municipal Storm Water Program Evaluation MS4 Maintenance Component Worksheet

Date of Evaluation Tuesday, July 24, 2012
Evaluator Name, Title Kelly McVay, DSW, NEDO
MS4 Permittee City of Middleburg Heights 3GQ00026*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
James Herron Director of Public Service	City of Middleburg Heights	(440) 234-2216 jherron@middleburgheights.com
Marty Kramer Facility Maintenance Manager	City of Middleburg Heights	(440) 234-6241
Donnie Cox Foreman	City of Middleburg Heights	(44) 234-2216 ext. 1503

MS4 Mapping			
Interview Questions		Response	
Outfalls and receiving waters mapped?		YES	
Catch basins?		NO	
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 help track problems through the system and find the source.	
Applicable Documents		Reviewed	Obtained
Map(s) of MS4 system		YES	YES

Notes
<p>MS4 Mapping Currently, stormwater management facilities are not labeled on any map and the City is unsure if they have finished mapping all catch basins. Please be aware that 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?		YES The whole City is done once every four years.	
Is cleaning and maintenance of catch basins tracked:		YES The City tracks which basins have been hit and can track material removed by totaling dumpster tickets.	
How are spoils materials disposed of?		Spoils are put on a decanting pad connected to sanitary sewer at the Former Wastewater Treatment Plant with street sweeping spoils. Once dried, they are placed in a dumpster on another pad which is connected to sanitary. The City has a contract with Allied Waste to take these spoils.	
Are storm drain pipes inspected? Proactive or only in response to blockage event?		YES The City has a contract with the Cuyahoga County Department of Public Works to have them inspect and clean storm pipes. This is done proactively.	
Applicable Documents		Reviewed	Obtained
List of active municipal construction projects		NONE	NONE
CHECK DATABASE BEFORE INSPECTION:			
List of municipal projects covered under the Ohio EPA general storm water NPDES permit for construction activities NONE			
NOTE: Permit is only required if project disturbs 1 or more acre (5 or more acres for "routine maintenance")			

Notes

Stormwater Management Facilities Operation and Maintenance	
Interview Questions	Response
Public facilities inspected?	YES
Frequency:	Weekly
Private facilities inspected?	YES
Frequency:	On occasion, typically in response to complaints or problems. The City checks known problem areas about once per month.

Stormwater Management Facilities Operation and Maintenance		
Interview Questions	Response	
Checklist used for inspections?	NO No documentation of inspections is kept.	
Have maintenance standards and procedures been established for these facilities?	YES	
How is maintenance prioritized? Is data evaluated to target maintenance resources?	NO The City periodically checks facilities to mow the grass and keep them functional. They typically need to address private ones more frequently because they usually aren't as well maintained by owners.	
Applicable Documents	Reviewed	Obtained
Inspection checklist	NONE	NONE

Notes
<p>Inspections of Stormwater Management Facilities</p> <p>The City of Middleburg Heights indicated there are four publicly-owned stormwater management facilities, at Middlebrook, Kline, Englewood, and the Service Department. These facilities are inspected weekly; however, no documentation of such inspections is kept and no checklist is used so we were unable to verify that the expected long-term maintenance program has been developed and implemented.</p> <p>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:</p> <ol style="list-style-type: none"> 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. <i>A checklist is recommended to perform inspections and should be reflective of the operation and maintenance standards established by the City.</i> 5. Taking enforcement action against the responsible party if they fail to maintain the BMP as required. <p>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)</p> <p>As a reminder, Ohio EPA has required a long-term maintenance plan for all post-construction BMPs since</p>

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? Frequency:	YES Each street is swept about 8 times per year
Frequency based on water quality factors (e.g. proximity to streams)?	NO
How are spoils disposed of?	Street sweeping spoils are disposed of with the catch basin cleanings 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 Carcasses are put in the general trash dumpster at the Service Department.
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 Leaves are collected and stored at the Former Wastewater Treatment Plant surrounded by block walls in a segregated area. Leaves are picked up by a contractor fairly often. They never sit on site for more than a week and no leftover leaves were observed on site at the time of inspection.
BMPs used during road maintenance activities? Describe types of road maintenance conducted by community staff and the BMPs used	YES The City does concrete and asphalt, curb, and catch basin repairs in-house. They contract out larger projects such as resurfacing. The City implements practices to keep sites clean such as removing debris from the site via vacuum or backhoe and sweeping up cutting debris.
BMP guidance available to field staff?	YES Training sessions provide some material and some information sheets are posted around the Service Department.

Road Maintenance		
Interview Questions	Response	
Deicers used by MS4?	YES	
Type and amount of deicer and additives tracked? What measures are being taken to minimize the application of deicers?	YES Salt is the only deicer used. The City calibrates the trucks and tells drivers to move at reduced speeds to get better spread and less bouncing. The City is also trying a new brand of salt which is supposed to have reduced bounce. The City still salts all roads.	
Sand/salt swept up after application? How soon?	YES At the end of the storm event.	
Does your community operate a snow stockpile yard to store snow that has been removed from community streets and parking lots? If YES, location of the yards: Has your community considered implementing best management practices to control the discharge of pollutants from snowmelt associated with snow storage yards? If YES, what BMPs have you implemented?	NO N/A	
Applicable Documents	Reviewed	Obtained
BMP guidance	YES	YES
Street sweeping records	NO	NO
Deicer application records	YES	YES

Notes
<p><u>Street Sweeping Records</u> Please be aware that the City needs to <i>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</i>. Please be sure to report the totals 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><u>Deicer Usage</u> 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 on how to reduce pollution from</p>

Notes
<p>road deicing activities.</p> <p>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.</p>

Flood Management			
Interview Questions	Response		
Inventory of flood management structures completed?	NO		
Structures been assessed for stormwater retrofit?	YES		
	The basin on Kline Road has been retrofitted and designed to include water quality consideration.		
New structures include water quality considerations?	YES		
Applicable Documents		Reviewed	Obtained
Inventory		YES	YES

Notes
<p><u>Inventory</u> A list of Detention/Retention basins owned by the City was provided; however, privately owned facilities should also be inventoried as well. An inventory of public/private-owned stormwater management facilities built since April 21, 2003 is part of the new mapping requirements of NPDES permit #OHQ000002. This inventory must be completed by the end of your next permit term, i.e., June 2014.</p> <p><u>Stormwater Retrofits</u> 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 1 or more acre of land. This program will not create BMPs in previously-developed areas unless they are being redeveloped and the 1-acre threshold is met. As such, US EPA is evaluating whether retrofits should be required in future generations of the MS4 permit.</p> <p>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.</p>

Facilities Operation & Maintenance

Interview Questions	Response																			
Inventory of MS4 facilities complete (i.e. facilities owned and operated by the MS4)?	YES																			
<p>Types of facilities included <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 	<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	<table border="1"> <thead> <tr> <th align="center">SWP3 Developed?</th> </tr> </thead> <tbody> <tr> <td align="center">N/A</td> </tr> </tbody> </table>	SWP3 Developed?	N/A	N/A	N/A	N/A	N/A
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<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 <p align="center">Former Wastewater Treatment Plant 18825 Sheldon Road</p> <ul style="list-style-type: none"> • Maintenance Yards <ul style="list-style-type: none"> ➢ How many do they operate? <u> 1 </u> ➢ List facility names/locations: <p align="center">Service Department 7375 Engle Road</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">NO</td> </tr> </tbody> </table>	Response	SWP3 Developed?	NO	N/A	YES	N/A	YES	NO	<table border="1"> <thead> <tr> <th align="center">SWP3 Developed?</th> </tr> </thead> <tbody> <tr> <td align="center">N/A</td> </tr> <tr> <td align="center">N/A</td> </tr> <tr> <td align="center">NO</td> </tr> </tbody> </table>	SWP3 Developed?	N/A	N/A	NO						
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<ul style="list-style-type: none"> • 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 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 	<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	<table border="1"> <thead> <tr> <th align="center">SWP3 Developed?</th> </tr> </thead> <tbody> <tr> <td align="center">N/A</td> </tr> <tr> <td align="center">N/A</td> </tr> </tbody> </table>	SWP3 Developed?	N/A	N/A									
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Facilities Operation & Maintenance		
Interview Questions	Response	
<ul style="list-style-type: none"> • Parks & Cemeteries <ul style="list-style-type: none"> ➢ How many in UA? <u>4</u> ➢ List facility names/locations: <p>Community Center 16000 Bagley Road</p> <p>Newton Park 14101-14139 Newton Road</p> <p>Uhlin Park 14301 Uhlin Drive</p> <p>Middleburg Commons 16699 Bagley Road</p> • Parking Lots <ul style="list-style-type: none"> ➢ How many do they operate? _____ ➢ List facility name/locations: • Bus Terminals • Vehicle Maintenance Garages <ul style="list-style-type: none"> ➢ How many do they operate? <u>2</u> ➢ List facility name/locations: <p>Service Department 7375 Engle Road</p> <p>Fire Station 15800 Bagley Road</p> 	<p>YES</p> <p>NO</p> <p>NO</p> <p>YES</p>	<p>N/A</p> <p>N/A</p> <p>N/A</p> <p>NO</p> <p>Only have lots at listed parks and City buildings</p> <p>N/A</p> <p>NO</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>The Service Department is the only facility which has documented inspections. These inspections are conducted annually.</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>A checklist is only used at the Service Department</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>Inspections at the Service Department are broken up among the management team and are typically conducted by :</p> <p>Marty Kramer, Facility Maintenance Manager or Don Cox, Foreman</p>	

Facilities Operation & Maintenance	
Interview Questions	Response
	<p>These inspectors have attended the annual training session with the Cuyahoga County Board of Health and have met with the Cuyahoga Soil and Water Conservation District in the past.</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 is SWP3 should match name given. If not, SWP3 must be updated.</p>	<p style="text-align: center;">YES</p> <p>Marty Kramer would be the contact for each facility and James Herron would be the overall contact. No SWP3 has been created to formally document these contacts.</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 would follow union rules. They have not had to deal with any such issues thus far. They would follow normal disciplinary procedures laid out for the City should a problem occur.</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>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 style="text-align: center;">YES</p> <p>Parking lots are swept at the same frequency as the streets, typically once per month if not more.</p> <p style="text-align: center;">YES</p> <p style="text-align: center;">NO</p> <p>Latex-based sealants are 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 style="text-align: center;">NO</p> <p style="text-align: center;">N/A</p> <p style="text-align: center;">YES</p> <p>The City is working with the Building Division to go through the legal process to get homeowners to reconnect. The City is aware of one illicit discharge currently which was identified by CCBH in their outfall inspections. They are actively working to resolve this issue.</p>
<p>Have you investigated the extent of infiltration and</p>	<p style="text-align: center;">YES</p>

Facilities Operation & Maintenance		
Interview Questions	Response	
inflow into storm sewer system?		
What methods have been used to conduct this investigation?	Cameras are used and flooding has led to intensive investigations in some areas in conjunction with the County. Dye testing is also used.	
What are your plans to repair and eliminate this source of illicit discharge?	The City is working with the Department of Public Works and homeowners to fix all sources of illicit discharge.	
Sewer spill and cleanup procedures in place?	NO	
Applicable Documents	Reviewed	Obtained
Facility inventory	YES	YES
Facility SWPPP	NONE	NONE

Notes
<p><u>Storm Water Pollution Prevention Plans (SWP3s)</u> A Storm Water Pollution Prevention Plan (SWP3) must be developed and implemented for the following facilities:</p> <ul style="list-style-type: none"> • Service Department • Former Wastewater Treatment Plant • Fire Station <p>Middleburg Heights to develop and begin implementing the SWP3 for these facilities within 2 years of permit renewal, i.e., by June 2011.</p> <p>The City indicated that vehicle washing occurs at the Fire Station which would require a SWP3 to be developed for these facilities. However, it appeared that the Fire Station 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 Station is 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. More information on this can be found on the field inspection worksheets for these facilities.</p> <p>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</p>

Pesticides, Herbicides & Fertilizers			
Interview Questions	Response		
Certified applicators used?	YES		
Integrated Pest Management (IPM) practices used?	N/A		
Storage location of pesticides, herbicides, and fertilizers:	None stored at City facilities.		
BMPs used during application:	N/A		
Fertilizer/pesticide application plan utilized?	N/A		
Applicable Documents		Reviewed	Obtained
Fertilizer/pesticide application plan		N/A	N/A

Notes
<p><u>Pesticide, Herbicide and Fertilizer Application</u> The City of Middleburg Heights does not apply any pesticides, herbicides, or fertilizers themselves. All of this type of work is contracted out to Brookside.</p>

Standards, BMPs, & Outreach			
Interview Questions	Response		
BMP technical guidance document available to maintenance staff?	YES		
MS4 use contractual staff to complete MS4 maintenance activities?	YES Larger road projects and fertilizer application is contracted out.		
BMP guidance materials provided to contracted staff?	NO		
Requirement to consider stormwater impacts and utilize appropriate BMPs in contracts?	NO Fertilizer contracts may require the applicator to blow fertilizer off sidewalks but construction contracts probably do not contain any such language.		
Materials used to educate the public regarding stormwater impacts on MS4 property (if applicable, i.e. public spaces):	<p>Pet waste: Pick up after your pet stations signs saying to clean up after your pet are in place. The City Community Center also has flyers with more information on this topic. It was suggested that the City add signage to relate this issue to storm water pollution.</p> <p>Litter reduction: There are "Do Not Litter" signs are in place at the parks. It was suggested that signage be added to trash bins to tie the problem into water quality.</p>		
Applicable Documents		Reviewed	Obtained
BMP manual or guidance document		YES	YES
Contract language for MS4 operation and maintenance activities		NONE	NONE

Notes

Technical Guidance and Specifications for Maintenance Staff

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 Department, Fire Station, and Former Wastewater Treatment Plant 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., *prohibiting the Fire Department from washing vehicles outside and providing inlet protection at parks with baseball diamonds etc.*). 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.

Contracted Staff

Contracted staff include those who do road maintenance and pesticide/herbicide/fertilizer application. 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.

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:	Annual training is done with the Cuyahoga County Board of Health. The City also plans on having a presentation done by the new salt provider about their new salt.				
Materials used to train staff:	CCBH used videos and PowerPoints. Todd Hauser with CSWCD has come in before to help train and the City is in works of bringing him back again this year.				
Applicable Documents					
Training materials	<table border="1"> <thead> <tr> <th align="center">Reviewed</th> <th align="center">Obtained</th> </tr> </thead> <tbody> <tr> <td align="center">YES</td> <td align="center">YES</td> </tr> </tbody> </table>	Reviewed	Obtained	YES	YES
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Notes

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

Permittee: City of Middleburg Heights – Service Department	
Address of facility: 7375 Engle Road	Size of facility: 5-6 acres
Date of visit: 7/24/12	Time of visit: 10:15am
Provide the name(s) and title(s) of permittee staff present during inspection	
Name	Title
<i>James Herron</i>	<i>Service Director</i>
<i>Marty Kramer</i>	<i>Facility Maintenance Manager</i>
<i>Don Cox</i>	<i>Foreman</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 has been developed.
Does the permittee conduct and document periodic inspections of the facility?	YES , annual inspections are conducted. The completed inspection form from February 28, 2012 was reviewed. Reports should be filled out with more detail on the findings in the future.
Are storm drains labeled and free of debris?	Storm drains are not labeled. A drain in the gravel lot by the salt storage area had some sediment accumulation and old dried paint on the grate. Inlet protection should be added or sediment should be prevented from entering the drain, e.g. via re-stoning, paving. A drain by the general trash dumpster had trails of staining leading up to it. These dumpsters must be covered to prevent the release of leachate. Dumpsters must be inspected to ensure there are no holes which would allow for materials to be released. It is recommended that these dumpsters not be kept so close to a storm drain if possible. A drain near the material storage area had some sediment buildup. This area should be swept more frequently and inlet protection be added to this drain or a small berm or roof be added to the bins of uncovered materials to better prevent the release of sediment to the MS4.
Vehicle maintenance, fueling and washing	
Are vehicle maintenance activities conducted in a designated place not exposed to stormwater?	YES , all vehicle maintenance activities are conducted indoors where drains are connected to an oil water separator which discharges to sanitary sewer.
Are fueling stations properly designed with spill kits nearby?	The fueling station was equipped with an emergency shut off and auto shut off valves. The station was covered by a roof and the two trench drains by the pumps are connected to sanitary sewer. A spill kit was located inside the building near the pump. It was recommended that a spill kit be stored right at the pump to make it easier and faster to respond to a spill.
Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer?	YES , vehicles are either washed in the bay indoors or in the covered outdoor bay. Both areas have drains which are connected to sanitary sewer.

Material storage	
Are all materials that are potential stormwater contaminants stored under cover or in secondary containment?	Materials such as dirt, sand, and gravel are stored in three walled bins. Some signs of sediment trailing were observed. It was recommended that these materials be covered, a berm be added to each bin, or inlet protection be added to the nearby storm drain to better prevent sediment from being discharged to the MS4.
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?	General trash dumpsters must be covered and inspected for holes so that water does not accumulate and leachate is not formed and released.
How is landscape waste stored?	N/A
Spill response	
Does the facility have a spill response plan, and are spill kits readily available?	YES , spill kits are stored throughout the building. It was recommended that one be moved to the fueling station.
Employee training	
What type of stormwater training does maintenance staff receive?	Employee training on storm water pollution prevention practices and identifying pollution sources must be provided.
Notes or additional information:	
<p>Storm Water Pollution Prevention Plan (SWP3) The City of Middleburg Heights 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.</p>	

INSPECTION PHOTOS
Service Department
City of Middleburg Heights
Photos Taken: July 24, 2012



Fig. 1 & 2: General trash and animal carcasses are thrown in these dumpsters, which were not covered. Further, it was evident that pollutants had spilled into the storm drain.



Fig. 3 & 4: Sediment had entered this storm drain and paint on the grate indicated something had been poured directly down the drain by the salt storage area.



Fig. 5: Extra salt was stored under a tarp surrounded by hay bales. The area was kept tidy.

Fig. 6: The fueling station



Fig. 7 & 8: Materials are stored in bins in this area. Some signs of trailing to the storm drain were observed.

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

Permittee: City of Middleburg Heights – Former Wastewater Treatment Plant	
Address of facility: 18825 Sheldon Road	Size of facility: 11 acres total (most wetlands/unused)
Date of visit: 7/24/12	Time of visit: 10:35am
Provide the name(s) and title(s) of permittee staff present during inspection	
Name	Title
<i>James Herron</i>	<i>Service Director</i>
<i>Marty Kramer</i>	<i>Facility Maintenance Manager</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 has been developed.
Does the permittee conduct and document periodic inspections of the facility?	NO
Are storm drains labeled and free of debris?	Many storm drains were in need of maintenance and had a build-up of sediment. As shown in the pictures below, one drain needed to have the inlet protection replaced as it was full of sediment, one drain did not have inlet protection which covered the whole drain, and one drain was completely clogged with sediment. These areas should be inspected and maintained more frequently. The source of this sediment build-up should also be investigated and remediated. It was suggested that a vegetated berm be added around the materials storage area to help better contain sediment from this area.
Vehicle maintenance, fueling and washing	
Are vehicle maintenance activities conducted in a designated place not exposed to stormwater?	No vehicle maintenance activities are conducted at this site.
Are fueling stations properly designed with spill kits nearby?	No fueling stations are located at this site.
Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer?	No vehicles area washed on this site.
Material storage	
Are all materials that are potential stormwater contaminants stored under cover or in secondary containment?	A general trash dumpster was left uncovered. This dumpster should be covered to prevent the accumulation of water and release of leachate. The dumpsters containing the catch basin cleanings and street sweeping spoils was also uncovered. These dumpsters are stored on a pad which drains to sanitary sewer; however, it was still recommended that these dumpsters be covered to prevent the materials from getting wet again and releasing leachates. The material storage area needs to be better stabilized, e.g. re-stoning, paving, vegetating.
Hazardous waste management	
Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff?	N/A

Waste management	
Are waste bins covered with waste properly disposed in containers?	
How is landscape waste stored?	These materials are kept in piles in bins. This material never stays on site for more than a week and is picked up frequently.
Spill response	
Does the facility have a spill response plan, and are spill kits readily available?	NO
Employee training	
What type of stormwater training does maintenance staff receive?	Employee training is provide annually as described in the Interview Worksheet.
Notes or additional information:	
<p>Storm Water Pollution Prevention Plan (SWP3) The City of Middleburg Heights 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.</p>	

INSPECTION PHOTOS
Former Wastewater Treatment Plant
City of Middleburg Heights
Photos Taken: July 24, 2012



Fig. 1: A storm drain on the entrance drive had been provided with inlet protection; however, was in need of maintenance. These drains should be inspected regularly to replace the fabric and to remove accumulated material.

Fig. 2: Another storm drain on the entrance drive had not been provided adequate inlet protection, as the entire drain was not covered.



Fig. 3: A drain on the drive at the facility which was clogged with sediment. This drain should have all sediment removed. Actions must either be taken to permanently cap this drain or provide inlet protection to prevent the release of sediment to your MS4 and clogging of the drain. Sources of such sediment buildup should also be remediated to help alleviate this issue.

Fig. 4: Yard waste material storage



Fig. 5: A general trash dumpster was left uncovered.

Fig. 6: The dewatering pad for catch basin cleanings and street sweeping spoils.



Fig. 7 & 8: A dumpster containing the catch basin cleanings and street sweeping spoils after they have been dewatered is kept on a pad which has a drain that is connected to sanitary sewer. These dumpsters were uncovered. They should be kept covered to prevent the recollection of water and release of leachates.

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

Permittee: City of Middleburg Heights – Fire Station	
Address of facility: 15800 Bagley Road	Size of facility: 1500 ft ²
Date of visit: 7/24/12	Time of visit: 11:00am
Provide the name(s) and title(s) of permittee staff present during inspection	
Name	Title
<i>James Herron</i>	<i>Service Director</i>
<i>Marty Kramer</i>	<i>Facility Maintenance Manager</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 has been developed.
Does the permittee conduct and document periodic inspections of the facility?	NO
Are storm drains labeled and free of debris?	YES
Vehicle maintenance, fueling and washing	
Are vehicle maintenance activities conducted in a designated place not exposed to stormwater?	No maintenance activities are conducted at this site.
Are fueling stations properly designed with spill kits nearby?	The fueling station is not equipped with automatic shutoff valves and does not have an emergency shutoff button. No spill kit was located at the pump. A kit should be placed at this pump and it was recommended that the aforementioned precautionary tools be added.
Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer?	YES , vehicles are all washed in the garage 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?	YES
How is landscape waste stored?	N/A
Spill response	
Does the facility have a spill response plan, and are spill kits readily available?	Recommended that a spill kit be added near the fuel pump.
Employee training	
What type of stormwater training does maintenance staff receive?	It did not appear that any storm water specific training had been provided to the Fire Station employees. 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 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 Middleburg Heights 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.