



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

May 15, 2013

RE: PORTAGE COUNTY  
CITY OF RAVENNA  
PERMIT NO. 3GQ00041\*AG  
MUNICIPAL STORM WATER  
PROGRAM INSPECTION

Patrick Jeffers  
Storm Water Manager  
530 N. Freedom Street  
Ravenna, OH 44266

Dear Mr. Jeffers:

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 Thursday, February 7, 2013, Ohio EPA met with you, Robert Finney and Kelly Engelhart of the City of Ravenna, as well as Eric Long and James Bierlair of Portage Soil and Water Conservation District, 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 update post-construction ordinance(s) within two years of permit renewal.** This is a violation of Part III.B.5.c of the Ohio EPA General Storm Water NPDES permit #OHC000002. The City was required to revise their ordinances to be equivalent with the technical requirements set forth in the Ohio EPA NPDES General Storm Water Permits for Construction Activities, which include the following EPA NPDES Permits: OHC000004. This was to be completed within two years of when the City's coverage under the MS4 general permit was granted (June 24, 2009). Sections 1052.08(f)(14),(g)(2)B of the City Ordinance only requires structural post-construction BMPs for "development" and "disturbed area" that is 5 or more acres, whereas post-construction water quality treatment is required for any site greater than one acre or part of a larger common plan of development or sale. Please ensure that Section 1052.08(e)(2) also meets or exceeds the requirements of Ohio EPA.

- **Failure to develop and implement a Storm Water Pollution Prevention Plan (SWP3) or ensuring that their contractor implements adequate controls for the Compost Facility.** 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 Compost Facilities are required to have a SWP3 in accordance with Ohio EPA industrial storm water regulations, which includes 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 2 years of NPDES permit renewal. If the operator, Ready to Haul is the responsible party for the SWP3, they must also obtain an industrial storm water permit.
  
- **Failure to provide controls for reducing or eliminating the discharge of pollutants from the facilities.** 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:
  - City Park: Failure to prevent the discharge of wastewater from the power washing of the garage floor. Failure to implement sediment controls around material stockpiles. Failure to properly label and dispose of fluorescent bulbs and label gasoline and used oil.
  - Streets Department: Failure to implement sediment controls around stockpile, e.g. sand, topsoil, mulch, stone, and grinding piles throughout the service yard. Failure to properly label fluorescent bulbs and label gasoline/used oil.
  - Wastewater Treatment Plant: This site does not meet the “no exposure” criteria. Failure to label used oil as “USED OIL.” Please confirm that drains in building where polymers are used in sludge management are directed back to the plant and to where floor drains in maintenance building connect.

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 the Portage Soil and Water Conservation District to implement portions of the program for municipal operations on its behalf. During our interview, the City was unable to produce written agreements. If these do not yet exist, please develop a written agreement for services provided by these entities in regards to MS4 program implementation and submit a copy with your response to this letter. **NOTE:** As the City of Ravenna is under permit with Portage County and Others, it is difficult to decipher what parts of the annual report are pertinent to the City. Please try to separate each municipality in future annual reports.

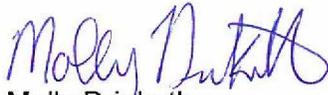
### Deficiencies

- The City needs to track salt usage, catch basin cleaning and street sweeping on a January-to-December calendar basis rather than a seasonal total as stated in Part IV.C of the Small MS4 NPDES Permit #OHQ000002 for reporting with the New Annual Report form. All maintenance logs should be kept for records. In addition, the amount of street sweepings should be tracked separately from the amount of catch basin cleanings and storm sewer debris must be collected NOT flushed out to the storm sewer.
- The City did not know if drains inside Building #10 of the Streets Department and at the Wastewater Treatment Plant went to storm or sanitary sewer. This is important information which must be researched through building plans and dye or smoke tests. If these indoor drains are connected to a storm sewer, they must be capped or redirected to a sanitary sewer.
- While the City has an inventory of all privately-owned post-construction BMPs installed since April 21, 2003 and all public storm water 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 and that the City develop/adopt checklists as a standard for conducting the annual inspections. This will ensure that all facilities are inspected and that all BMPs are constructed and maintained according to the City's adopted standards. Ohio EPA also recommends that the type of BMP is clearly identified within the inventory.
- The City was unaware whether any sewer spill and cleanup procedures are in place. If these do not yet exist, please develop written procedures and submit a copy with your response to this letter.
- The City's storm water public education and outreach program should include more than one mechanism and target at least five different storm water themes over the permit term. At least one of the themes should *target the development community*, as required by Part III.B.1.c of the NPDES permit. ***This is a reminder that this requirement must be met no later than January 29, 2014.***
- The City must educate Park & Rec Staff in order to maintain no exposure. Refer to the *MS4 Maintenance Facility Field Inspection Worksheets* for other areas of improvement. 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.
- The City has not developed contract language to require storm water BMP implementation when a third-party provides municipal operations on behalf of the City. Contract language must be added to all contracts with such parties, e.g., operators that provide car impoundment, herbicide/ pesticide application and mulching services, as well as road maintenance activities and emergency repairs. Further, we recommend periodic inspection of their operations to assure that they are implementing BMPs.

Please review my comments, as well as the attached interview and field review, 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 June 17, 2013.** We recognize that ordinances take time to enact due to procedural constraints. You are requested to provide in writing to this office an acceptable time frame to enact the post construction ordinance update. Please note that this response does not replace the requirement to submit an Annual Report. Your annual report for 2013 will be due on April 1, 2014.

If you have any questions, please contact me via email at [molly.drinkuth@epa.ohio.gov](mailto:molly.drinkuth@epa.ohio.gov) or at (330) 963-1215.

Sincerely,



Molly Drinkuth  
Environmental Engineer  
Division of Surface Water

MD:ddw

Enclosure

cc: Robert Finney, City Engineer  
Kelly Engelhart, Service Director

ec: Eric Long, Portage SWCD ([elong@portageswcd.org](mailto:elong@portageswcd.org))  
James Bierlair, Portage SWCD ([jbierlair@portageswcd.org](mailto:jbierlair@portageswcd.org))

## Municipal Storm Water Program Evaluation MS4 Maintenance Component Worksheet

<b>Date of Evaluation</b>	<b>February 7, 2013</b>
<b>Evaluator Name, Title</b>	<b>Dan Bogoevski &amp; Molly Drinkuth, DSW</b>
<b>MS4 Permittee</b>	<b>City of Ravenna Portage County: #3GQ00041*AG</b>

**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
Patrick Jeffers	Assistant City Engineer Storm Water Manager	330.296.5666 Patrick.Jeffers@ci.ravenna.oh.us
Robert Finney	City Engineer Building Department	Bob.Finney@ci.ravenna.oh.us
Kelly Engelhart	Service Director	Kelly.Engelhart@ci.ravenna.oh.us
Eric Long	Portage SWCD Storm Water Engineer	(330) 297-7633 ext. 120 elong@portageswcd.org
James Bierlair	Portage SWCD District Coordinator	jbierlair@portageswcd.org

MS4 Mapping		
Interview Questions	Response	
Outfalls and receiving waters mapped? Catch basins? Pipes, ditches, other conduits? Public stormwater facilities (BMPs)? Private stormwater facilities (BMPs)?	<b>YES</b> <b>YES</b> <b>YES - See Note #1 on Page 1</b> <b>N/A</b> <b>YES</b>	
How are maps used (i.e. tracking illicit discharges)?	Used to track illicit discharges and for maintenance.	
Applicable Documents	Reviewed	Obtained
Map(s) of MS4 system	YES	YES: See Note #2 on Page 1
Notes		
<p>1.) Piping is currently 80% mapped and must be completed by June 2014. Approximately 98% of the MS4 is piped vs. open ditch. The City does not own any storm water management structures and have mapped privately-owned structures going back to 1982 (list was provided). Ohio EPA suggested that they be clear about type of BMP and utilize terminology in the NPDES permit for construction.</p> <p>2.) Please submit a copy of MS4 map in pdf or other such electronic format for future annual reports.</p>		

Catch Basin Cleaning			
Interview Question	Response		
Schedule established for inspections and cleaning?	<p><b>NO</b></p> <p>Typically at the end of the year, the Streets Department sends Engineering a report to show what they have done, but do not appear to have a schedule or measurable goal.</p>		
Is cleaning and maintenance of catch basins tracked:	<p><b>Yes but records aren't kept</b></p> <p>Chuck provides map to crews, use the maps to track the cleaning of catch basins. <b>The City should keep these maps on file as record.</b></p>		
How are spoils materials disposed of?	<p>Vactor truck to dumpster (15 yard container) at Streets Garage from April to September and then taken to landfill. See Note #1 on Page 2.</p>		
Are storm drain pipes inspected?	<p><b>YES</b></p> <p>No proactive program, but will inspect in response to blockage or as needed to address an issue. Do have capability to camera, clean, jet out, etc.</p>		
Proactive or only in response to blockage event?			
Applicable Documents		Reviewed	Obtained
List of active municipal construction projects		No projects	N/A
Notes			
<p>1. Currently the City does not vacuum clean the storm sewer; the storm is flushed out to the stream. Ohio EPA instructed City to implement the procedure of vacuuming out and collect the debris. It was also recommended that the City build a dewatering pad and direct the leachate to sanitary (to prevent leachate leakage from occurring with the current setup) or to take the cleanout material to the WWTP.</p> <p>2. Waterline repairs, street rebuilds, salt shed built in 2012. City states that none of these projects have disturbed 1 or more acres of land, therefore no NOIs were submitted. City Hike &amp; Bike Trail was a project in 2009, approximately 15,000' x 10.' No post-construction water quality practices were provided on that project. May not be construction activity due to no earth disturbance. <b>Please submit a copy of plans to Ohio EPA.</b></p> <p>3. <b>There is no current formal agreement between Portage SWCD and the City of Ravenna for 2012 or 2013.</b> Portage SWCD provided a signed copy of the MOU for 2011 (copy obtained). Portage SWCD says they do not have an agreement because it would have shown a surplus of funds to the commissioners and could have cut funding to SWCD. So, they couldn't give a signed, officially-executed MOU with City. This was a way for SWCD to ensure funding for the future. <b>Please provide a current MOU.</b></p> <p>4. Agreement between City and Portage SWCD is for plan review for disturbances of 1 or more acre, but the City ordinance sets threshold at 15,000 SF for ESC. Engineering Department reviews projects 15,000 SF to 1 acre.</p> <p>5. City ordinance, Section 1052.08(g)(2)B only requires post-construction BMPs for "development" and "disturbed area" that is <b>5 or more acres.</b> <b>This is a violation of Part III.B.5.a,c of the MS4 Permit OHQ000002.</b> The City was required to update their ordinance to meet or exceed Ohio EPA standards within 2 years of the renewal date of their MS4 permit, 6/24/2011.</p>			

Stormwater Management Facilities Operation and Maintenance	
Interview Questions	Response
Public facilities inspected?	<b>NO</b>
Frequency:	They do not own any storm water management facilities.

Stormwater Management Facilities Operation and Maintenance		
Interview Questions	Response	
Private facilities inspected?  Frequency:	<p><b>YES</b></p> <p>Usually inspected every March to ensure that they are operating properly. Some were to ensure that post-construction BMPs were installed. Did find some errors in installation and got them corrected.</p>	
Checklist used for inspections?	<p><b>Not Sure</b></p> <p>Mark Bowen conducts the inspections, not sure if he uses a checklist. Ohio EPA recommends that the City uses an inspection checklist.</p>	
Have maintenance standards and procedures been established for these facilities?	<p><b>YES</b></p> <p>When new development is approved, City requires the submittal of a long-term maintenance plan. Ordinance references the Ohio Rainwater &amp; Land Development Manual.</p>	
How is maintenance prioritized? Is data evaluated to target maintenance resources?	<p>MS4 system maintenance typically occurs when a problem occurs. So priority is to address the specific problem that occurred.</p>	
Applicable Documents	Reviewed	Obtained
Inspection checklist	Does not exist	

Road Maintenance		
Interview Questions	Response	
Streets regularly swept?  Frequency:	<p><b>YES</b></p> <p>May through October. The City runs street sweeper every day to do the initial spring cleanup and then every Friday to maintain. Downtown is done weekly and then pick up on street left off previous week (log kept in truck seasonally and then thrown away – keep copy of log in records).</p> <p>2,000-2,400 CY of sweepings per year on average. *Ohio EPA was given 7 street sweeping pickup slips for the 15 CY container for 2012.</p>	
Frequency based on water quality factors (e.g. proximity to streams)?	N/A	
How are spoils disposed of?	<p>Stored in dumpster (15 yard container) at Streets Garage from April to October and hauled away to a landfill. If the same dumpster is used for catch basin cleanings (see Note #1 on Page 2), street sweepings will be comingled with catch basin cleanings, so the City cannot ask for beneficial reuse of street sweepings should that become an option in the future.</p>	

<b>Road Maintenance</b>	
<b>Interview Questions</b>	<b>Response</b>
<p>Does the community collect road kill?</p> <p>What do they do with the carcasses?</p>	<p style="text-align: center;"><b>NO</b></p> <p>City uses private contractor, R&amp;R Sanitation. Ohio EPA suggested the City reviews the contracts to ensure R&amp;R Sanitation require proper disposal.</p>
<p>Does the community have a leaf collection program?</p> <p>What do they do with the collected leaves?</p> <p><b>NOTE:</b> Landfills have been banned from accepting yard waste, so MS4 cannot place leaves and yard waste in dumpster. Must be composted at a licensed Class IV composting facility. Communities may temporarily store leaves awaiting transport to a composting facility but leafate must be prevented from discharging.</p>	<p style="text-align: center;"><b>YES</b></p> <p>Two crews collect from October to December. The leaves are taken to the compost facility. City owns the facility, but it is leased out to a private operator, Ready-to-Haul. Please provide a copy of the contract to demonstrate that the private operator is responsible for operations. Refer to the inspection worksheet for compost facility.</p>
<p>BMPs used during road maintenance activities?</p> <p>Describe types of road maintenance conducted by community staff and the BMPs used</p>	<p style="text-align: center;"><b>YES</b></p> <p>City does annual storm water management training of Streets Department and they are expected to use BMPs. Waterline breaks, reasphalting after repair, grind and overlay on road surfaces, sweeping, plowing, striping, etc.</p>
<p>BMP guidance available to field staff?</p>	<p style="text-align: center;"><b>YES</b></p> <p>Annual training. Used StormWatch videos and utilize the pamphlets that come with the DVDs, but not sure if they are circulated to staff. May have something hanging in the break room (posters were not hanging in Streets Garage break room at visit).</p>
<p>Deicers used by MS4?</p>	<p style="text-align: center;"><b>YES</b></p> <p>CaCl, NaCl, salt brine was started this past year, beet juice was used but may not be continued as it foams up.</p>
<p>Type and amount of deicer and additives tracked?</p> <p>What measures are being taken to minimize the application of deicers?</p>	<p style="text-align: center;"><b>YES</b></p> <p>City has a scale and computerized system to track salt usage. Beet juice is supposed to allow reduced application of salt. Don't believe there is a written "sensible salting policy," but have purchased equipment that dispenses salt more efficiently.</p> <p>They share a 7000 ton salt storage facility with ODOT on Oakwood Street. This facility was just built in 2012 and is big enough to load under cover. Some remaining salt at facility in Spruce Street, but this belongs to Ravenna Twp. It was their temporary storage location due to the mild winter in 2011-2012 season.</p> <p>City was reporting on a seasonal basis but was told to report for the calendar year.</p>

Road Maintenance		
Interview Questions	Response	
Sand/salt swept up after application? How soon?	N/A since loading now occurs indoors.	
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?	<p><b>YES</b></p> <p>Compost facility on Lake Avenue. Location may change in the future to behind the salt storage on Oakwood Avenue.</p> <p><b>NO</b></p> <p>Ohio EPA recommended storing at the bottom topography first and a berm.</p>	
Applicable Documents	Reviewed	Obtained
BMP guidance	YES – Ohio EPA provides the training DVDs	
Street sweeping records	Records N/A	Disposal slips
Deicer application records	Yes	Sample

Flood Management		
Interview Questions	Response	
Inventory of flood management structures completed?	<p><b>N/A</b></p> <p>City does not own any flood management structures.</p>	
Structures been assessed for stormwater retrofit?	<p><b>N/A</b></p> <p>Did not do it to address issue from 2003. See Notes.</p>	
New structures include water quality considerations?	<p><b>YES</b></p> <p>Required by the post-construction ordinance for new development and redevelopment of 1 or more acre.</p>	
Applicable Documents	Reviewed	Obtained
Inventory	N/A	

Notes
<p>In 2003, City deepened stream channels to alleviate flooding concerns. Haven't had problems since that time. Discussed that Ohio EPA wants to see the green infrastructure solutions and water quality enhancements incorporated into future flood management projects. Incorporate storm water into planning and zoning codes.</p> <p>Pizza Hut installed rain garden. Sheetz will be installing bioretention.</p>

**Facilities Operation & Maintenance**

Interview Questions	Response																				
<p>Inventory of MS4 facilities complete (i.e. facilities owned and operated by the MS4)?</p> <p><b>Types of facilities included</b>  <i>These need their own NPDES storm water permit for industrial activities, if there is a discharge of runoff from these operations:</i></p> <ul style="list-style-type: none"> <li>• Landfills Type: _____</li> <li>• Airports</li> <li>• Shipping Ports or Marinas</li> <li>• Steam Electric Power Plants</li> <li>• Wastewater Treatment Plants <math>\geq 1</math> MGD or with a pretreatment program</li> </ul> <p><i>To Verify No Exposure: 3GRN00541 *DG City of Ravenna WWTP, 3722 Hommon Rd, OH 44266, Issued: 10/6/2010</i></p> <p><b>These do not need their own permit, but do have to develop an SWP3 unless noted as N/A:</b></p> <ul style="list-style-type: none"> <li>• Impound Lots</li> <li>• Leaf Collection Yards                             <ul style="list-style-type: none"> <li>✓ No discharge of leafate permitted</li> <li>Ravenna Composting Facility E Lake St., Ravenna, OH</li> </ul> </li> <li>• Maintenance Yards                             <ul style="list-style-type: none"> <li>➤ How many do they operate? <u>1</u>.</li> <li>➤ List facility names/locations:  Streets Garage 705 Oakwood Street, Ravenna, OH</li> </ul> </li> <li>• Composting Operations                             <ul style="list-style-type: none"> <li>✓ No discharge of leachate permitted</li> </ul> </li> <li>• Solid Waste Transfer Stations or Operations                             <ul style="list-style-type: none"> <li>✓ Under landfill permit if community owns the transfer station and the landfill where waste will be taken</li> <li>✓ If not, then SWP3 is only needed if vehicle maintenance, equipment washing or fueling activities occur at the transfer station, <b>or</b> if a portion of the facility is involved with recycling or composting</li> </ul> </li> </ul>	<p align="center"><b>YES</b></p> <p>Streets Garage, Water Treatment Plant, Wastewater Treatment Plant, Parks Department, Police Department and Fire Department</p> <p><b>Compost facility is leased to a private operator.</b></p> <table border="1"> <thead> <tr> <th align="center">Response</th> <th align="center">SWP3 Developed?</th> </tr> </thead> <tbody> <tr> <td align="center">NO</td> <td align="center">N/A</td> </tr> <tr> <td align="center">YES</td> <td align="center">YES</td> </tr> </tbody> </table> <p><b>None of the SWP3s have maps.</b></p> <table border="1"> <thead> <tr> <th align="center">Response</th> <th align="center">SWP3 Developed?</th> </tr> </thead> <tbody> <tr> <td align="center">NO</td> <td></td> </tr> <tr> <td align="center">YES</td> <td align="center">N/A</td> </tr> <tr> <td align="center">YES</td> <td align="center">YES</td> </tr> </tbody> </table> <p>Composting operation is leased. Private operator, Ready to Haul, needs to have IGP and SWP3.                      Jim Ready (330) 562-0550                      9001 SR 14, Streetsboro, OH</p> <p align="center"><b>NO</b></p>	Response	SWP3 Developed?	NO	N/A	NO	N/A	NO	N/A	NO	N/A	YES	YES	Response	SWP3 Developed?	NO		YES	N/A	YES	YES
Response	SWP3 Developed?																				
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YES	YES																				



Facilities Operation & Maintenance			
Interview Questions	Response		
Describe enforcement procedures used to address noncompliance on a MS4-owner facility, i.e., what disciplinary measures are taken against those that do not implement standard operating procedures?	<p>Progressive disciplinary system. Verbal warning (a written document), then written warning for second offense, third offense is time off without pay and fourth offense is termination.</p> <p>No disciplinary actions taken. But, Fire Department kept wanting to wash vehicles at the Fire Department. Took issue up to the Mayor and now they have changed policy. Had to make changes at the wash bay to fit the fire trucks at the Service Garage.</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>NO</p> <p>YES – Corner of Cedar &amp; Meridian</p> <p>NO</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"> <li>➤ How many? _____</li> <li>➤ Do you track frequency and volume?</li> </ul> <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>Dry weather screening is utilized as a tool to determine if illicit cross-connections exist.</p>		
<p>Have you investigated the extent of infiltration and inflow into storm sewer system?</p> <p>What methods have been used to conduct this investigation?</p> <p>What are your plans to repair and eliminate this source of illicit discharge?</p>	<p>NO</p> <p>N/A</p>		
Sewer spill and cleanup procedures in place?	<b>Not Sure – Have WWTP Respond</b>		
	<b>Applicable Documents</b>	<b>Reviewed</b>	<b>Obtained</b>
	Facility inventory	YES	YES
	Facility SWPPP	YES	YES

Pesticides, Herbicides & Fertilizers	
Interview Questions	Response
Certified applicators used?	<p>N/A</p> <p>Not used and no licensed applicator on Staff.</p>
Integrated Pest Management (IPM) practices used?	N/A

Storage location of pesticides, herbicides, and fertilizers:	N/A since do not use.		
BMPs used during application:	N/A since do not use.		
Fertilizer/pesticide application plan utilized?	N/A since do not use.		
<b>Applicable Documents</b>		<b>Reviewed</b>	<b>Obtained</b>
Fertilizer/pesticide application plan		N/A	

<b>Standards, BMPs, &amp; Outreach</b>			
<b>Interview Questions</b>	<b>Response</b>		
BMP technical guidance document available to maintenance staff?	<p style="text-align: center;"><b>YES</b></p> <p>Streets Department does MS4 maintenance. They go through DVD training. Not sure if staff is given a copy of the booklets that come with the DVDs.</p>		
MS4 use contractual staff to complete MS4 maintenance activities?	<b>NO</b>		
BMP guidance materials provided to contracted staff?	<b>N/A</b>		
Requirement to consider stormwater impacts and utilize appropriate BMPs in contracts?	<b>N/A</b>		
Materials used to educate the public regarding stormwater impacts on MS4 property (if applicable, i.e. public spaces):	<p>Pet waste: City put together a pet waste brochure, but it has not yet been distributed. No signage in parks.</p> <p>Litter reduction: Trash cans are provided at the parks. No educational signage.</p> <p>Rain garden installed at Chestnut Hills Park with educational signage. A rain garden was recently installed at Maplewood Park and will also have sign.</p> <p>Parks and Recreation Day Camp for about 400 kids. One educational session each summer discusses storm water.</p> <p>Annual booth at the Balloona Fair. Provide storm water brochure.</p> <p>Education is done jointly between Portage SWCD and City of Ravenna. <b>NO CURRENT MOU.</b></p>		
<b>Applicable Documents</b>		<b>Reviewed</b>	<b>Obtained</b>
BMP manual or guidance document		YES – Ohio EPA provides the DVDs	
Contract language for MS4 operation and maintenance activities		N/A	

<b>Staff Education and Training</b>		
<b>Interview Questions</b>	<b>Response</b>	
Staff trained to identify potential storm water pollution sources which would result in an illicit discharge?  Frequency:	<p><b>YES – Use DVD training.</b></p> <p>Do provide training annually. Rotate and do one of four videos each year. (Collected attendance sheets.)</p>	
Materials used to train staff:	<p>DVD – Storm Watch videos provided from Ohio EPA lending library. No other materials are utilized.</p> <p>Staff attends Ohio EPA workshops done in conjunction with the NE Ohio Storm Water Training Council.</p>	
<b>Applicable Documents</b>	<b>Reviewed</b>	<b>Obtained</b>
Training materials	YES	YES

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

<b>Permittee:</b> City of Ravenna	<b>Facility:</b> RAC / Van Harcom Annex
<b>Address of facility:</b> 530 N. Freedom Street	<b>Size of facility:</b> 2 ac
<b>Date of visit:</b> February 7, 2013	<b>Time of visit:</b> 12:55 PM
<b>Provide the name(s) and title(s) of permittee staff present during inspection</b>	
<b>Name</b>	<b>Title</b>
Patrick Jeffers	Assistant City Engineer / Storm Water Manager
Eric Long	Portage SWCD, Storm Water Engineer
Dan Bogoevski & Molly Drinkuth	Ohio EPA, DSW
<b>Evaluator Observations:</b>	
<b>SWPPP or stormwater plan</b>	
Has the maintenance facility developed a SWPPP or stormwater plan?	Yes – No Exposure situation so no SWP3 is required
Does the plan include a site map, list of pollutant sources, BMPs, and maintenance procedures?	N/A
Does the permittee conduct and document periodic inspections of the facility?	N/A – But yes, they do
Are storm drains labeled and free of debris?	Yes
<b>Vehicle maintenance, fueling and washing</b>	
Are vehicle maintenance activities conducted in a designated place not exposed to stormwater?	Yes – all inside and no floor drains are visible
Are fueling stations properly designed with spill kits nearby?	N/A
Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer?	Do not wash on site
<b>Material storage</b>	
Are all materials that are potential stormwater contaminants stored under cover or in secondary containment?	Yes – all materials of concern are inside
<b>Hazardous waste management</b>	
Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff?	All drums of potassium permanganate (~25) appeared to be empty. No used oil or florescent bulbs
<b>Waste management</b>	
Are waste bins covered with waste properly disposed in containers?	Dumpster is lidded and in good condition but staining from leaks was evident and trash had spilled over onto ground. Please confirm what waste goes to this

	dumpster. In order to maintain no exposure, debris must be cleaned up and dumpster maintained (if accepts RAC waste).
How is landscape waste stored?	N/A
<b>Spill response</b>	
Does the facility have a spill response plan, and are spill kits readily available?	N/A
<b>Employee training</b>	
What type of stormwater training do maintenance staff receive?	Need to train the Parks & Rec staff on how to maintain no exposure.
<b>Notes or additional information:</b> Vehicle storage for Parks & Rec / Water Department.	



Confirm if Dumpster Contains RAC Waste



All Paint Cans Are Stored Inside



All Drums Are Stored Inside



No Floor Drains are Visible

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

<b>Permittee:</b> City of Ravenna	<b>Facility:</b> City Park / John Tontimonia Park
<b>Address of facility:</b> 165 Oakwood Street	<b>Size of facility:</b> 27 ac
<b>Date of visit:</b> February 7, 2013	<b>Time of visit:</b> 1:25 PM
<b>Provide the name(s) and title(s) of permittee staff present during inspection</b>	
<b>Name</b>	<b>Title</b>
Patrick Jeffers	Assistant City Engineer / Storm Water Manager
Gary Livengood & Bob Denison	Parks Supervisor
Eric Long	Portage SWCD, Storm Water Engineer
Dan Bogoevski & Molly Drinkuth	Ohio EPA, DSW
<b>Evaluator Observations:</b>	
<b>SWPPP or stormwater plan</b>	
Has the maintenance facility developed a SWPPP or stormwater plan?	Yes
Does the plan include a site map, list of pollutant sources, BMPs, and maintenance procedures?	No map
Does the permittee conduct and document periodic inspections of the facility?	Twice per quarter
Are storm drains labeled and free of debris?	Storm drains are labeled <b>One was full of snow with murky water in next</b>
<b>Vehicle maintenance, fueling and washing</b>	
Are vehicle maintenance activities conducted in a designated place not exposed to stormwater?	<b>Mower washing occurs outside</b> , all else inside. Ohio EPA recommended using dry method.
Are fueling stations properly designed with spill kits nearby?	Gas cans are stored inside but most fueling occurs outside. Implement Spill Controls.
Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer?	Mower washing occurs outside. It is recommended that accumulated grass is swept off/blown off with air outside away from storm drains. Grass should be swept up and disposed of afterwards. If water is necessary, washing must occur only after grass has been removed and on a grassy area away, from any storm drains. The garage floor was power washed the day before inspection and grit flowed outside. <b>SWP3 procedure of sweeping was NOT followed.</b>
<b>Material storage</b>	
Are all materials that are potential stormwater contaminants stored under cover or in secondary containment?	<b>NO – soil stockpile not fully vegetated/controlled.</b> Other items are stored inside.

<b>Hazardous waste management</b>	
Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff?	No – See Notes on Page 14
<b>Waste management</b>	
Are waste bins covered with waste properly disposed in containers?	Has lid but was open at time of inspection. Bin in good condition – <b>be sure to keep the lid closed.</b>
How is landscape waste stored?	Put in dumpster and taken to compost site.
<b>Spill response</b>	
Does the facility have a spill response plan, and are spill kits readily available?	Yes
<b>Employee training</b>	
What type of stormwater training do maintenance staff receive?	DVD videos; Reviewing the SWP3
<p><b>Notes or additional information:</b>  Gasoline stored in separate room with containment labeled flammable. Oil absorbent drum and spill kit is available, however it <b>needs a more prominent label.</b>  Used oil can continue to be transported to the Streets Department. If more than 55 gallons is transported at a time, other regulatory requirements would have to be met.  Fluorescent bulbs are currently wrapped and disposed of in the dumpster. This is allowed <b>only</b> if every single lamp can be documented as non-hazardous (this is by each manufacturer and model). As this approach is very burdensome, <b>Ohio EPA recommends the City to collect and manage fluorescent bulbs as a universal waste – e.g. collect in labeled, dated, closed boxes and shipped off for recycling.</b></p>	



Ensure the lid of dumpster is closed



Grit from garage had been power washed outside

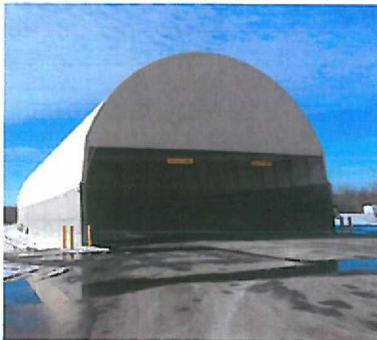
**FIELD INSPECTION WORKSHEET**  
**MS4 SWMP Evaluation**  
**MS4 Maintenance Facility Field Inspection Worksheet**

<b>Permittee:</b> City of Ravenna	<b>Facility:</b> Streets Department
<b>Address of facility:</b> 705 Oakwood Street	<b>Size of facility:</b>
<b>Date of visit:</b> February 7, 2013	<b>Time of visit:</b> 2:05 PM
<b>Provide the name(s) and title(s) of permittee staff present during inspection</b>	
<b>Name</b>	<b>Title</b>
Patrick Jeffers	Assistant City Engineer / Storm Water Manager
Chuck Dowdy	Street Superintendent
Eric Long	Portage SWCD, Storm Water Engineer
Dan Bogoevski & Molly Drinkuth	Ohio EPA, DSW
<b>Evaluator Observations:</b>	
<b>SWPPP or stormwater plan</b>	
Has the maintenance facility developed a SWPPP or stormwater plan?	Yes
Does the plan include a site map, list of pollutant sources, BMPs, and maintenance procedures?	No map
Does the permittee conduct and document periodic inspections of the facility?	Twice per quarter
Are storm drains labeled and free of debris?	<b>May have blockage – need to clean</b>
<b>Vehicle maintenance, fueling and washing</b>	
Are vehicle maintenance activities conducted in a designated place not exposed to stormwater?	Yes – all inside, connected to sanitary
Are fueling stations properly designed with spill kits nearby?	Yes – see photos
Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer?	Yes – wash bay to oil/water separator to sanitary sewer. Has not been cleaned out yet. <b>Add to maintenance schedule.</b>
<b>Material storage</b>	
Are all materials that are potential stormwater contaminants stored under cover or in secondary containment?	<b>NO – soil and spoils are outside</b>
<b>Hazardous waste management</b>	
Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff?	<b>No sticker located on fluorescent bulb storage box.</b> Used oil tank is under roof and double walled but no secondary containment is provided (recommended). <b>Add spill kit to used oil location.</b>

	Fuel tanks are in good condition, nozzle is covered, fill hoses are in containment and spill kit is available; <b>add label to emergency shut off.</b>
<b>Waste management</b>	
Are waste bins covered with waste properly disposed in containers?	Yes
How is landscape waste stored?	N/A
<b>Spill response</b>	
Does the facility have a spill response plan, and are spill kits readily available?	Yes
<b>Employee training</b>	
What type of stormwater training do maintenance staff receive?	DVD videos
<b>Notes or additional information:</b> Floor drains were redirected to sanitary in summer 2012: \$33,000 included pump, piping, concrete flooring. <b>No education posters in break room</b> (during interview they were believed to be hung up). Electrician takes the box of fluorescent bulbs and City Hall has receipts. Salt dome is new structure and in great shape, shared with ODOT – <b>add sign and dust pan with broom to sweep out any salt that gets tracked out of structure.</b> Inside building #10 plates are covering old brick floor – <b>permanently cap off any floor drains (there is at least one).</b> Outside building #10 – <b>clean up salt spills.</b>	



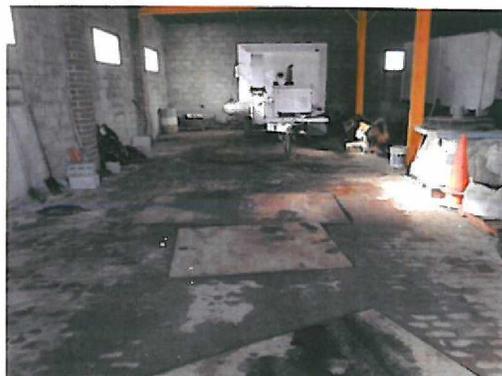
Clean up salt spills as they occur



Add sign and broom to sweep up salt



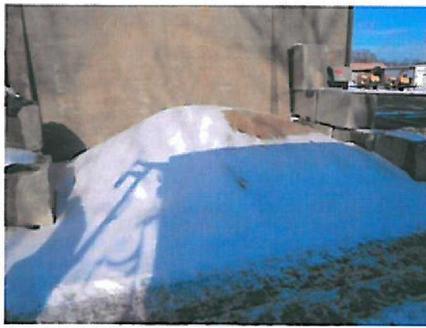
Regularly take scrap to scrap yard



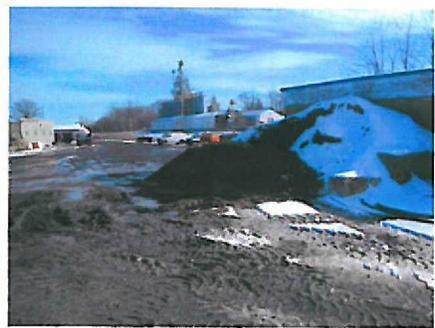
Permanently cap floor drains inside building #10



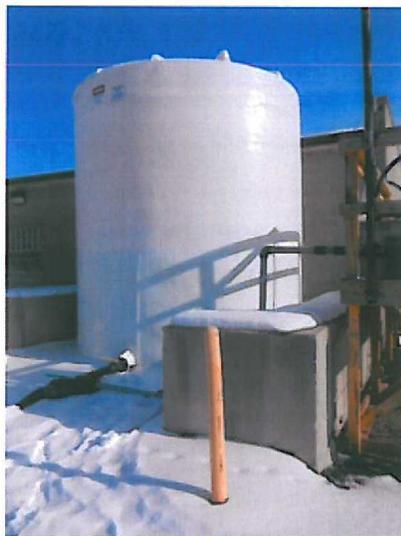
Line ends in bag to prevent leaking



Cover sand and piles with tarp/roof



Need to label emergency shut off



Ensure that gas cans are not left out

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

<b>Permittee:</b> City of Ravenna	<b>Facility:</b> Wastewater Treatment Plant
<b>Address of facility:</b> 3722 Hommon Avenue	<b>Size of facility:</b> 11 ac
<b>Date of visit:</b> February 7, 2013	<b>Time of visit:</b> 3:45 PM
<b>Provide the name(s) and title(s) of permittee staff present during inspection</b>	
<b>Name</b>	<b>Title</b>
Patrick Jeffers	Assistant City Engineer / Storm Water Manager
Bill Bregant	Superintendent
Eric Long	Portage SWCD, Storm Water Engineer
Dan Bogoevski & Molly Drinkuth	Ohio EPA, DSW
<b>Evaluator Observations:</b>	
<b>SWPPP or stormwater plan</b>	
Has the maintenance facility developed a SWPPP or stormwater plan?	Yes
Does the plan include a site map, list of pollutant sources, BMPs, and maintenance procedures?	No map
Does the permittee conduct and document periodic inspections of the facility?	Twice per quarter
Are storm drains labeled and free of debris?	Not labeled
<b>Vehicle maintenance, fueling and washing</b>	
Are vehicle maintenance activities conducted in a designated place not exposed to stormwater?	Unknown whether drains connect to sanitary or storm sewers.
Are fueling stations properly designed with spill kits nearby?	N/A
Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer?	Vehicles are washed in maintenance building. <b>Find out if drains connect to storm or sanitary.</b>
<b>Material storage</b>	
Are all materials that are potential stormwater contaminants stored under cover or in secondary containment?	NO. Verify that drains are connected back to WWTP.
<b>Hazardous waste management</b>	
Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff?	<b>Used oil must be properly labeled.</b>
<b>Waste management</b>	
Are waste bins covered with waste properly disposed in containers?	Yes
How is landscape waste stored?	

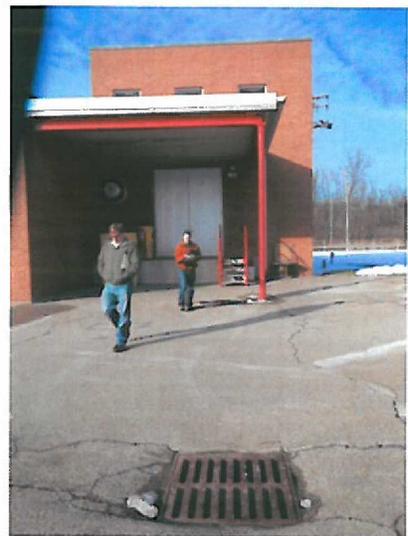
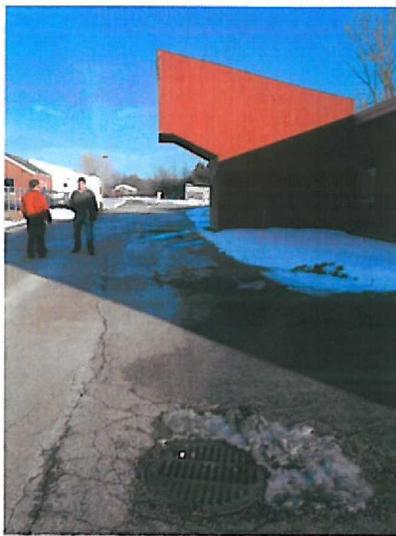
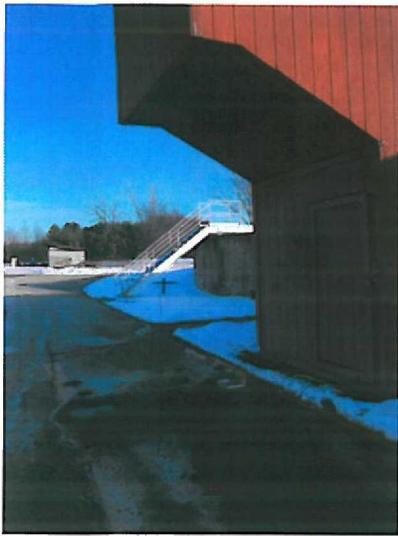
	N/A
<b>Spill response</b>	
Does the facility have a spill response plan, and are spill kits readily available?	<b>Unknown – please submit</b>
<b>Employee training</b>	
What type of stormwater training do maintenance staff receive?	<b>Unknown – please submit</b>
<b>Notes or additional information:</b> This site does not meet the “no exposure” criteria. Verify that the building drains are connected back to the WWTP. Sludge building deposits have been tracked around site.	



Left: Dumpsters lidded and don't appear to be leaking (close proximity to drain). Clean up minor spillage of “rags”  
 Right: Sludge drying bed is full of catch basin and grit cleanings – dispose of at landfill



Implement good housekeeping to limit track out from sludge building



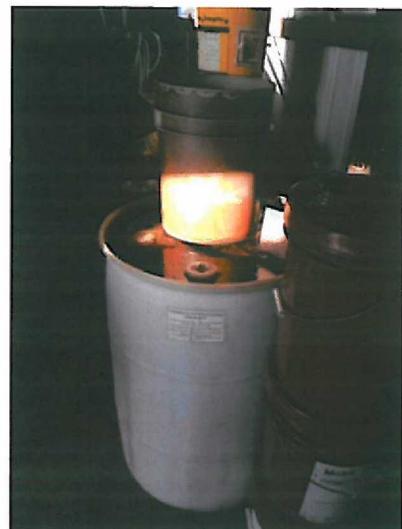
Connection points for loading are not exposed but are located in close proximity to catch basin if spilling occurs



Implement good housekeeping to avoid leaking – take old machinery to scrap yard if not to be used; clean others/cover



Confirm that floor drains are connected to sanitary or cap



Used Oil must be properly labeled "USED OIL"

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

<b>Permittee:</b> No Permit is Currently Held	<b>Facility:</b> Compost Facility
<b>Address of facility:</b> Lake Avenue	<b>Size of facility:</b> 8 ac
<b>Date of visit:</b> February 7, 2013	<b>Time of visit:</b> 4:45 PM
<b>Provide the name(s) and title(s) of permittee staff present during inspection</b>	
<b>Name</b>	<b>Title</b>
Patrick Jeffers	Assistant City Engineer / Storm Water Manager
Eric Long	Portage SWCD, Storm Water Engineer
Dan Bogoevski & Molly Drinkuth	Ohio EPA, DSW
<b>Evaluator Observations:</b>	
<b>SWPPP or stormwater plan</b>	
Has the maintenance facility developed a SWPPP or stormwater plan?	No – site is leased to an operator, Ready to Haul who <b>DOES NOT</b> have an industrial storm water permit.
Does the plan include a site map, list of pollutant sources, BMPs, and maintenance procedures?	N/A – a SWPPP has not been developed
Does the permittee conduct and document periodic inspections of the facility?	N/A – no permit is currently held
Are storm drains labeled and free of debris?	N/A
<b>Vehicle maintenance, fueling and washing</b>	
Are vehicle maintenance activities conducted in a designated place not exposed to stormwater?	N/A
Are fueling stations properly designed with spill kits nearby?	N/A
Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer?	No
<b>Material storage</b>	
Are all materials that are potential stormwater contaminants stored under cover or in secondary containment?	<b>NO – the site is encircled with mulch socks which do NOT prevent the discharge of leachate.</b> Off-site discharge of leaves and leachate is evident along Lake Road and along leaf collection area. Pictures on following page.
<b>Hazardous waste management</b>	
Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff?	N/A
<b>Waste management</b>	
Are waste bins covered with waste properly disposed in containers?	N/A
How is landscape waste stored?	N/A

<b>Spill response</b>	
Does the facility have a spill response plan, and are spill kits readily available?	N/A
<b>Employee training</b>	
What type of stormwater training do maintenance staff receive?	Unknown
<b>Notes or additional information:</b>	
<p>Please send a copy of the contract so that we can confirm that the City of Ravenna is the license holder and Ready-to-Haul is the operator. <b>Ready-to-Haul has been in contact with Ohio EPA and is process of developing the SWPPP for the industrial storm water permit.</b> They are proposing to create a berm around the entire site and use an inner ring of compost sock in adjacent to the berm, to absorb water which will be incorporated into the compost. A tank will be available to pump water into and recirculate into the compost. A contingency plan of taking the water to the WWTP will be included in case of a heavy rainfall.</p> <p>If an industrial permit thru Ready-to-Haul is not upheld, the City will be obligated to develop/implement a SWPPP under the MS4 permit because it is a municipal operation.</p>	

