



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

August 27, 2013

RE: SUMMIT COUNTY
CITY OF CUYAHOGA FALLS
MUNICIPAL STORM WATER
MCM #6 INSPECTION
3GQ00065*BG

Russell Kring
Sewer Collections Manager
City of Cuyahoga Falls
2560 Bailey Road
Cuyahoga Falls, OH 44221

NOTICE OF VIOLATION

Dear Mr. Kring:

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

On June 12, 2013, Ohio EPA met with you to determine compliance with the NPDES permit and the 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.

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

Violations:

- **Failure to develop storm water pollution prevention plan (SWPPP) for the Brookledge Golf Course Maintenance Facility.** This is a violation of Part III.B.6.c of the Small MS4 NPDES permit #OHQ000002 and Ohio Revised Code (ORC) 6111.04 and 6111.07. This facility conducts operations described in 40 CFR Part 122.26(b)(14), and as such, must have an SWPPP. The City of Cuyahoga Falls has not developed an SWPPP for this municipal facility. The NPDES permit #OHQ000002 required SWPPPs to be developed and implemented at all such municipal facilities within 2 years of NPDES permit renewal, i.e., June 17, 2011.

- **Failure to implement procedures for the proper disposal of waste removed from your MS4.** This is a violation of Part III.B.6.d.iii.3 of the NPDES permit and Ohio Revised Code 6111.04 and 6111.07. Street sweepings and catch basin cleanings are a solid waste and any liquids which are decanted from such materials, as well as storm water which contacts stockpiles of these materials, is leachate, a wastewater which must be managed accordingly. The City must implement best management practices (BMPs) to prevent the discharge of this leachate. Further, these spoils may not be re-used as fill without explicit permission from Ohio EPA's Division of Materials and Waste Management. See comments in the attached worksheets for suggestions and recommendations.
- **Failure to provide controls (BMPs) for reducing or eliminating the discharge of pollutants from municipal facilities.** This is a violation of Part III.B.6.d.iii.2 of the NPDES permit and ORC 6111.04 and 6111.07. This violation was noted for the following operations at your facilities:
 - Failure to prevent the discharge of pollutants from leaking vehicles and equipment stored outside of the Service Complex and Service Center Annex.
 - Failure to keep dumpsters covered to prevent the discharge of wastewater to the City's MS4.
 - Failure to provide containment for the stockpile of street sweepings at the Service Center Annex. Refer to the Facility Field Inspection Worksheet for the Service Center Annex for more information.
 - Failure to provide secondary containment for brine tanks stored outside at the Service Center Annex and the Ward 8 Maintenance Area, to prevent the discharge of pollutants.
 - Failure to implement sediment controls around material stockpiles throughout the Street Department yard of the Service Complex and a sand stockpile at the Service Center Annex.

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 and lidded dumpsters 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 submit a Notice of Termination (NOT) within 45 days of reaching final stabilization on municipal construction projects.** This is a violation of Part IV.A of the Ohio EPA General Storm Water NPDES permit #OHC000003. Our records show that the City of Cuyahoga Falls still has an active permit under the Ohio EPA General Storm Water NPDES Permit for Construction Activities at five (5) municipal sites, which the City indicated were completed and have reached final stabilization. ***Please submit an NOT for the following projects immediately:***
 - Cuyahoga Falls Tennis Courts
 - Permit No. 3GC04587*AG
 - Chart Road between Keyser Parkway and State Road
 - Permit No. 3GC02750*AG
 - Fire Station #5
 - Permit No. 3GC02050*AG

- Reconstruction of Chart Road Phase 2
 - Permit No. 3GC05226*AG
- Mud Brook Trail
 - Permit No. 3GC03201*AG

Deficiencies:

- The City must enhance their program to ensure long-term operation and maintenance (O&M) of public/ private stormwater management facilities. The City is required to have an inventory of all privately-owned post-construction BMPs installed since April 21, 2003, and public stormwater management facilities. Ohio EPA recommends that each facility be inspected at least once a year either by the City or the party responsible for long-term maintenance. We recommend the City develop checklists or adopt checklists as your standard for conducting these inspections. This will ensure that all facilities are inspected and that all BMPs are constructed and maintained according to the City's adopted standards. The City must establish standards for these maintenance tasks. Most communities reference standards contained in the *Rainwater and Land Development* (ODNR, 2006) manual or the United States Environmental Protection Agency's Menu of BMPs rather than establish their own. Additional information can be found at the Center for Watershed Protection webpage for stormwater management at <http://www.cwp.org/2013-04-05-16-15-03/stormwater-management>.

A program to ensure long term maintenance of post-construction BMPs typically includes (a) maintaining an inventory of all public and those private post-construction BMPs installed since April 21, 2003, (b) maintaining a copy of the long-term maintenance plan for each BMP, (c) establishing a system to track maintenance activities by the responsible party, and (d) taking enforcement action if maintenance is not performed by the responsible party as required by the maintenance plan.

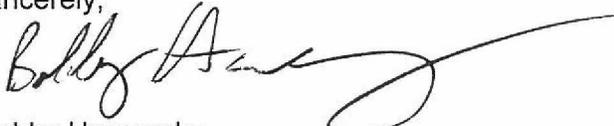
- The City has not included the Brookledge Golf Course Maintenance Facility on its inventory of municipal operations. As long as fueling, vehicle maintenance, or vehicle or equipment washing activities are occurring on these sites, they must be included in your inventory of municipal operations.
- To meet the mapping obligations of NPDES Permit #OHQ000002, the map must be updated to show ditches, conduits and storm water management facilities (including publicly-owned post-construction BMPs). 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. Please ensure that a map of the MS4 is produced no later than January 29, 2014.
- The City has not conducted routine inspections for any of their municipal facilities. Inspections are required to be performed on a routine basis as specified in each facility's SWPPP. The Ohio EPA recommends that facilities be inspected monthly. A comprehensive site evaluation must also be conducted at least once per year. We strongly recommend the use of storm water inspection checklists for these facilities to standardize inspections and remind inspectors of the critical areas that must be reviewed during an inspection. Checklists are included in the SWPPPs for each facility and should be provided for the Golf Course Maintenance Facility as well.

- The City had not been tracking the total amount of catch basin cleanings and street sweepings removed from the MS4. Please be sure to track this amount as it is required to be reported on the Annual Report form that must be submitted to Ohio EPA by April 1st each year. In addition, the City needs to track salt usage, catch basin cleaning, and street sweeping on a January-to-December calendar basis rather than a seasonal total as stated in Part IV.C of the Small MS4 NPDES Permit #OHQ000002 for reporting with the new Annual Report form.
- 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 or have at their work stations. By making materials available to staff at the field level, implementation of storm water BMPs should improve.
- 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 did not provide me with a copy of a pesticide, herbicide and fertilizer application plan. The development of a formal application plan is an important tool in minimizing the application of these storm water pollutants. Please provide an application plan.
- 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 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 September 31, 2013.** 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 at (330) 963-1128 or via e-mail at robert.hrusovsky@epa.ohio.gov.

Sincerely,



Bobby Hrusovsky
Assistant to the District Engineer
Division of Surface Water

BH:ddw

ec: Molly Drinkuth, Ohio EPA, DSW, NEDO

Municipal Storm Water Program Evaluation MS4 Maintenance Component Worksheet

Date of Evaluation	June 12, 2013
Evaluator Name, Title	Bobby Hrusovsky, DSW - NEDO
MS4 Permittee	City of Cuyahoga Falls, 3GQ00065*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
Russell Kring Sewer Collections Manager	Water Utilities Department	(330) 971-8133 kringrw@cityofcf.com

MS4 Mapping			
Interview Questions	Response		
Outfalls and receiving waters mapped?	YES		
Catch basins?	YES		
Pipes, ditches, other conduits?	Only pipes have been mapped.		
Public stormwater facilities (BMPs)?	NO		
Private stormwater facilities (BMPs)?	NO		
How are maps used (i.e. tracking illicit discharges)?	Maps are used for maintenance purposes, complaints concerning illicit discharges, and as an inventory of outfalls.		
Applicable Documents		Reviewed	Obtained
Map of MS4 system		YES	YES

Notes
<p>MS4 Mapping The City did provide us with a map identifying their outfalls, catch basins and publicly-owned storm sewers. No other storm water structures were indicated on this map. Be aware, to meet the mapping obligations of NPDES Permit #OHQ000002, i.e., the MS4 permit in effect from 2009-2014, the map must show 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. Please ensure that you complete these additional mapping requirements by the end of the current permit term, i.e., January 29, 2014.</p>

Catch Basin Cleaning	
Interview Question	Response
Schedule established for inspections and cleaning?	NO
	The City indicated that a road crew has not been available for inspections and cleaning.
Is cleaning and maintenance of catch basins tracked:	YES
	Cleanings are tracked through work orders. Work orders are entered in computer and

How are spoils materials disposed of?	sorted. Materials are dumped at a dump site near Water Works Park where it can dewater. The water is contained on-site. A stockpile is also stored at the Service Center Annex. This stockpile is not contained and leachate is flowing offsite. This is a violation of the NPDES permit.				
Are storm drain pipes inspected?	YES				
Proactive or only in response to blockage event?	Not Proactive, only when there is a complaint or problem.				
Applicable Documents					
List of active municipal construction projects	<table border="1" style="width: 100%;"> <tr> <td style="text-align: center;">Reviewed</td> <td style="text-align: center;">Obtained</td> </tr> <tr> <td style="text-align: center;">YES</td> <td style="text-align: center;">YES</td> </tr> </table>	Reviewed	Obtained	YES	YES
Reviewed	Obtained				
YES	YES				

Notes
<p><u>Municipal Construction Projects</u> Five municipal construction projects still have an active permit according to the Ohio EPA's database: Cuyahoga Falls Tennis Courts (3GC04587*AG), Chart Road between Keyser Parkway and State Road (3GC02750*AG), Fire Station #5 (3GC02050*AG), Reconstruction of Chart Road Phase 2 (3GC05226*AG), Mud Brook Trail (3GC03201*AG). The city noted that all five of these construction projects have been completed and have reached final stabilization. If construction is complete or the project is no longer viable, please submit Notices of Termination (NOTs) for these projects to close out NPDES permit coverage. The NOT and instructions can be obtained on the Ohio EPA Storm Water Program webpage at www.epa.ohio.gov/dsw/storm/stormform.aspx. As a reminder, coverage under the Ohio EPA General Storm Water NPDES Permit for Construction Activities is to be terminated within 45 days of when the project reaches final stabilization. Please be sure to incorporate this requirement into your procedures on all future projects.</p> <p><u>MS4 System Repair and Maintenance</u> Proactive inspections of the City's MS4 system may prevent certain problems from occurring. Ohio EPA would like to see a more proactive inspection of the storm pipes and catch basins to help improve your MS4 program and reduce pollutants.</p>

Stormwater Management Facilities Operation and Maintenance	
Interview Questions	Response
Public facilities inspected?	YES
Frequency:	The frequency of inspections is unknown. Mr. Kring was aware that the Parks Department inspects one detention pond, but is unaware if others are being inspected.
Private facilities inspected?	YES
Frequency:	Only facilities the City has agreements with are inspected. They are inspected by the owner of the facility. LTMA have been required since 2008.
Checklist used for inspections?	The City does not inspect stormwater management facilities.
Have maintenance standards and procedures been established for these facilities?	Yes, in the agreements. The designer of the stormwater management facility is asked to come up with a schedule based on its design.

Stormwater Management Facilities Operation and Maintenance			
Interview Questions		Response	
How is maintenance prioritized? Is data evaluated to target maintenance resources?		Inspection reports are received from each private facility.	
Applicable Documents		Reviewed	Obtained
Inspection checklist		YES, from private facility	YES

Notes
<p>Inspections of Stormwater Management Facilities</p> <p>Please be aware that the City of Cuyahoga Falls is required to ensure long-term maintenance of stormwater management facilities. Ohio EPA requires that this program include all privately-owned facilities constructed since April 21, 2003, and all publicly-owned stormwater management facilities. Stormwater 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).</p> <p>A complete post-construction BMP program includes the following:</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 5. A checklist is recommended to perform inspections and should be reflective of the operation and maintenance standards established by the City. As discussed, a City official does not necessarily have to physically conduct these inspections. Property owners can perform these inspections and report their findings to the City. Regardless of the option chosen, a standardized checklist would be very helpful to ensure thorough and consistent inspections. 6. Taking enforcement action against the responsible party if they fail to install the BMP per the approved plan or fail to maintain the BMP as required. <p>Information on developing an effective long-term maintenance program for post-construction BMPs can be found from the Center for Watershed Protection at http://cwp.org/2013-04-05-16-15-03/stormwater-management.</p> <p>The City indicated that a few publicly-owned stormwater management facilities exist but are not a part of the City's long-term maintenance program. These facilities include a rain garden between 6th and 7th Street, south of Silver Lake Avenue, a detention basin at the tennis courts, and a detention basin by Issaquah Road. A long-term operation and maintenance plan must be developed and implemented for each of these facilities.</p>

Road Maintenance	
Interview Questions	Response
Streets regularly swept?	YES
Frequency:	Try to sweep all streets every month, weather permitting, usually from April to October. Mr.

Road Maintenance	
Interview Questions	Response
	Kring was not sure if there is a log of street sweepings. We recommend a log be kept to report the amount of material being collected.
Frequency based on water quality factors (e.g. proximity to streams)?	NO
How are spoils disposed of?	Spoils are improperly stockpiled at the Service Center Annex where the leachate is not contained. <i>This is a violation of the NPDES permit.</i>
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 Road kill goes into a sanitation packer which is taken to the solid waste transfer station.
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 leafate must be prevented from discharging.	YES The collected leaves are taken to Sagamore Soils in Hudson.
BMPs used during road maintenance activities? Describe types of road maintenance conducted by community staff and the BMPs used	NO Will protect catch basin if needed.
BMP guidance available to field staff?	NO
Deicers used by MS4? Tracked 2011-2012 season should be 2012 Jan-Dec	YES The City uses road salt, brine, Clearlane and beet juice. Brine is produced from the City's water treatment plant.
Type and amount of deicer and additives tracked? What measures are being taken to minimize the application of deicers?	YES Road Salt and Clearlane is tracked by the amount of tons ordered, but not used. Brine is not tracked. E-poke spreaders are used and regulate the amount of salt going on the road.
Sand/salt swept up after application? How soon?	NO Sweepers cannot be out in winter.

Road Maintenance		
Interview Questions	Response	
Does your community operate a snow stockpile yard to store snow that has been removed from community streets and parking lots?	NO	
If YES, location of the yards:		
Has your community considered implementing best management practices to control the discharge of pollutants from snowmelt associated with snow storage yards?	N/A	
If YES, what BMPs have you implemented?		
Applicable Documents	Reviewed	Obtained
BMP guidance	NO	NO
Street sweeping records	NO	NO
Deicer application records	NO	NO

Notes
<p>Street Sweeping and Catch Basin Cleaning Disposal</p> <p>There is no containment of the pile of catch basin cleanings and street sweeping spoils, which allows for an illegal discharge of leachate. This is a violation of Part III.B.6.d.iii.3 of the NPDES permit #OHQ000002. The City of Cuyahoga Falls must find an alternative storage method for handling street sweepings and catch basin cleanings and preventing the leachate from discharging to the nearby storm drain. The City must find an alternative storage method for handling street sweepings and catch basin cleanings. See the Facility Inspection Worksheet for the Service Center Annex for more information on this issue.</p> <p>Also, 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 2013</i>. Please be sure to report the total per calendar year (January to December) in the annual report for 2012 as stated in Part IV.C.2 on reporting of the Ohio EPA General Storm Water NPDES Permit for small MS4s #OHQ000002.</p> <p>Deicer Usage</p> <p>Tracking the amount of deicers used is one BMP that can help reduce the amount applied. 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.</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., brine, beet juice.</p>

Flood Management			
Interview Questions		Response	
Inventory of flood management structures completed?		NO	
Structures been assessed for stormwater retrofit?		NO	
New structures include water quality considerations?		YES Future projects will include water quality considerations.	
Applicable Documents		Reviewed	Obtained
Inventory		NO	NO

Notes
<p>Flood Management Structures The City has identified the detention basin near the tennis courts to be a flood management structure, but it has not been inventoried.</p> <p>Stormwater Retrofits 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)?		NO	
<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 		<p>Response</p> <p>NO NO NO NO NO</p>	<p>SWP3 Developed?</p> <p>N/A N/A N/A N/A N/A</p>
<p>NOTE: No permit or SWP3 required if facility has no exposure. However, even if a No</p>			

Facilities Operation & Maintenance		
Interview Questions	Response	
	Exposure Certification has been submitted for the facility, inspect to verify validity.	
	<u>Response</u>	<u>SWP3 Developed?</u>
<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 	YES	YES
<p>Service Center Annex 2511 Bailey Road</p>		
<ul style="list-style-type: none"> • Leaf Collection Yards: <ul style="list-style-type: none"> ✓ No discharge of leafate permitted • Maintenance Yards <ul style="list-style-type: none"> ➤ How many do they operate? <u> 2 </u> ➤ List facility names/locations: 	NO	N/A
<p>Ward 8 Maintenance Area 851 West Bath Rd</p>		
<p>Service Complex 2560 Bailey Rd</p>		
<ul style="list-style-type: none"> • Composting Operations <ul style="list-style-type: none"> ✓ No discharge of leachate permitted 	NO	N/A
<ul style="list-style-type: none"> • 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 	NO	N/A
<ul style="list-style-type: none"> • Parks & Cemeteries <ul style="list-style-type: none"> ➤ How many in UA? <p style="margin-left: 20px;">3 Cemeteries, 18 Parks (one requires a SWPPP)</p> ➤ List facility names/locations: 	YES	NO
<p>Brookledge Golf Course Maintenance Garage 1621 Bailey Rd</p>		
<ul style="list-style-type: none"> • Parking Lots <ul style="list-style-type: none"> ➤ How many do they operate? <u> 1 </u> ➤ List facility name/locations: 	YES	N/A
<p>City Hall / Natatorium 2310 2nd St</p>		
<ul style="list-style-type: none"> • Bus Terminals 	NO	N/A

Facilities Operation & Maintenance	
Interview Questions	Response
<ul style="list-style-type: none"> • Vehicle Maintenance Garages <ul style="list-style-type: none"> ➤ How many do they operate? <u> 3 </u> ➤ List facility name/locations: <p style="text-align: center;">Ward 8 Maintenance Area Service Complex Brookledge Golf Course – NO SWPPP</p>	YES 2-YES, 1-NO
<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>	NO
<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>	NO
<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>	No inspections have been performed, but Mr. Kring noted he would be inspecting.
<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>	YES
<p>Describe enforcement procedures used to address noncompliance on a MS4-owner facility, i.e., what disciplinary measures are taken against those that do not implement standard operating procedures?</p>	Discipline would be based on a progressive structure, i.e., verbal warning, written warning, additional training, etc.
<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</p>	YES Once per month YES MAYBE

Facilities Operation & Maintenance			
Interview Questions	Response		
asphalt parking lots? 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.	Not sure if coal-based sealants are used. The City contracts out to seal the parking lot. Please refer to the note on the left.		
Do you have any combined sewer systems? If yes, do you have any combined sewer overflows? ➤ How many? _____ ➤ Do you track frequency and volume? Are you aware of any illicit cross connections between your sanitary sewer and MS4? If so, what is your plan to eliminate this illicit discharge?	NO N/A YES The City has a comprehensive map of the Sanitary Sewer Overflows (SSOs) indicating the eliminated and active SSOs.		
Have you investigated the extent of infiltration and inflow into storm sewer system? What methods have been used to conduct this investigation? What are your plans to repair and eliminate this source of illicit discharge?	YES Minor smoke testing. No illicit discharges found.		
Sewer spill and cleanup procedures in place?	YES		
	Applicable Documents	Reviewed	Obtained
	Facility inventory	YES	NO
	Facility SWPPP	YES	YES

Notes
<p>Storm Water Pollution Prevention Plan (SWPPP) A Storm Water Pollution Prevention Plan (SWPPP) must be developed and implemented for the Brookledge Golf Course Maintenance Building.</p> <p>The Ohio EPA General Storm Water NPDES Permit for Small MS4s #OHQ000002 requires the City of Cuyahoga Falls to develop and begin implementing the SWPPP for these facilities within 2 years of permit renewal, i.e., by June 2011.</p>

Notes
<p>The City indicated that no vehicle maintenance or washing occurs at the other cemeteries and parks noted above which would not require an SWPPP to be developed for these facilities. The Golf Course facility must be inspected at a frequency specified in the SWPPP. The SWPPP should contain a checklist to provide consistency to facility inspections. The SWPPP 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 5.1.2. Also refer to the following website for information on developing SWPPP for this facility: http://www.epa.ohio.gov/dsw/permits/GP_IndustrialStormWater.aspx</p> <p><u>Municipal Facility Inspections</u> The City has not conducted storm water inspections of their municipal facilities. 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 SWPPP. If this annual inspection reveals deficiencies in the SWPPP or BMPs that are ineffective, the SWPPP must be revised to correct the problems.</p>

Pesticides, Herbicides & Fertilizers			
Interview Questions		Response	
Certified applicators?		YES The Building & Grounds Department and the Parks Department are applying.	
Integrated Pest Management (IPM) practices used?		NO	
Storage location of pesticides, herbicides, and fertilizers:		The Parks Department stores the materials at the Brookledge Golf Course Maintenance Facility. Mr. Kring was not sure where Building & Grounds stores these materials.	
BMPs used during application:		Applied per manufacturer's directions.	
Fertilizer/pesticide application plan utilized?		NO	
Applicable Documents		Reviewed	Obtained
Fertilizer/pesticide application plan		NO	NO

Notes

Standards, BMPs, & Outreach	
Interview Questions	Response
BMP technical guidance document available to maintenance staff?	NO
MS4 use contractual staff to complete MS4 maintenance activities?	NO
BMP guidance materials provided to contracted staff?	N/A
Requirement to consider stormwater impacts and utilize appropriate BMPs in contracts?	N/A
Materials used to educate the public regarding stormwater impacts on MS4 property (if applicable, i.e. public spaces):	Pamphlets are available at City Hall. Pet waste: Brochures at City Hall, not sure if they are available at parks.

Standards, BMPs, & Outreach			
Interview Questions		Response	
		Litter reduction: Yes, part of the City's recycling program. Trash containers are labeled with information.	
Applicable Documents		Reviewed	Obtained
BMP manual or guidance document		NO	NO
Contract language for MS4 operation and maintenance activities		NO	NO

Notes
<p>Technical Guidance and Specifications for Maintenance Staff</p> <p>The City needs to improve the dissemination of technical guidance to its maintenance staff on storm water pollution prevention matters. The City should look for posters that can be hung in work areas or lunchrooms, or guidebooks that can be taken out into the field with maintenance crews. This will help reinforce employee training. Once prepared, the City will need to train staff on the SWPPP for the Brookledge Golf Course Maintenance Facility 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.</p>

Staff Education and Training			
Interview Questions		Response	
Staff trained to identify potential storm water pollution sources which would result in an illicit discharge?		YES	
Frequency:		Once per year	
Materials used to train staff:		Power-Points, Videos (Storm Watch)	
Applicable Documents		Reviewed	Obtained
Training materials		YES	YES

Notes
<p>The City was made aware that Storm Watch videos can be provided from Ohio EPA lending library and Ohio EPA workshops done in conjunction with the NE Ohio Storm Water Training Council. They were also asked to maintain records of sign in sheets at future training events.</p>

FIELD INSPECTION WORKSHEET
MS4 SWMP Evaluation
Cuyahoga Falls Service Center Annex Field Inspection Worksheet

Permittee: City of Cuyahoga Falls	
Address of facility: 2511 Bailey Road	Size of facility: 4.28 acres
Date of visit: June 12, 2013	Time of visit: 3:30 pm
Provide the name(s) and title(s) of permittee staff present during inspection	
Name	Title
<i>Russ Kring</i>	<i>Sewer Collections Manager</i>
Evaluator Observations:	
SWPPP or stormwater plan	
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?	The plan does include a site map, but must be updated. BMPs are not shown.
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?	N/A. Vehicle maintenance is conducted at the service complex. None is conducted here.
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?	N/A. Vehicles are washed at the service complex.
Material storage	
Are all materials that are potential stormwater contaminants stored under cover or in secondary containment?	NO
Hazardous waste management	
Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff?	NO
Waste management	
Are waste bins covered with waste properly disposed in containers?	One dumpster was not covered.
How is landscape waste stored?	N/A
Spill response	
Does the facility have a spill response plan, and are spill kits readily available?	The facility has a plan, but no spill kits are readily available.
Employee training	
What type of stormwater training do maintenance staff receive?	Annual Training
Notes or additional information:	
<p>SWPPP The Service Center Annex does have an SWPPP, but it needs updated. The site map shows materials that were not being stored at this facility and does not show materials that are currently being stored at this facility (street sweepings/catch basin cleanings, Clearlane). Three catch basins are shown in the site map connecting to each other, but it is not known where the flow discharges. This must be investigated and shown on the site map.</p>	
Snow Plows	

A number of snow plows are stored along the north fence line. A few of the plows were leaking hydraulic oil (Figure 1). To prevent leaking, the hydraulic connectors could be fastened together or, if not, a plastic bag can be secured around the connectors with a rubber band. Routine inspections on the snow plows are necessary to look for any leaks. A spill kit should be available and all staff should know where it is located and how to use it if a spill occurs.

Street Sweepings/Catch Basin Cleanings

This stockpile is located along the north property line near the salt dome (Figure 2). The stockpile is not in containment and has developed a significant amount of leachate (Figure 3) which has flowed northeast and off of the property (Figure 4). The containment wall behind the pile has been pushed back and some cleanings along with leachate has been accumulating (Figure 5). ***This is a violation of Part III.B.6.d.iii.3 of the NPDES permit as a failure to adopt procedures for the proper disposal to waste removed from your MS4.*** Street sweepings and catch basin cleanings are a waste and must be treated like one. The cleanings must be contained and dewatered before proper disposal in a landfill. The cleanings can be dewatered in the sewage sump pit which is already at the facility. The street sweepings and catch basin cleanings procedures must be corrected immediately.

Brine Tanks

Brine storage tanks are stored on the north side of Building D. The brine should be stored in secondary containment in case a spill occurs. A spill kit should also be readily available to address any spill that was to occur.

Sand

A stockpile of sand is stored near the street sweepings and catch basin cleanings (Figure 6). Sand is erodible and must be stored under cover. The stockpile must be stored inside or covered with a tarp.

INSPECTION PHOTOS
Service Center Annex
City of Cuyahoga Falls
Photos Taken: June 12, 2013



Fig. 1: This photo shows a snow plow which has been leaking hydraulic oil.
Fig. 2: This photo shows the street sweepings and catch basin cleanings.



Fig. 3: This photo shows a pool of leachate from the street sweepings and catch basin cleanings stockpile.

Fig. 4: This photo shows the overflow of leachate from the pool shown in Figure 3.



Fig. 5: This photo shows the containment wall behind the street sweepings and catch basin cleanings stockpile. The wall has been pushed back and there is a mixture of cleanings and leachate behind the wall.

Fig. 6: This photo shows a stockpile of sand which must be covered with a tarp or stored under cover.

FIELD INSPECTION WORKSHEET
MS4 SWMP Evaluation
Electric Department Field Inspection Worksheet

Permittee: City of Cuyahoga Falls	
Address of facility: 2550 Bailey Road	Size of facility: 14.8 acres
Date of visit: June 12, 2013	Time of visit: 3:00 pm
Provide the name(s) and title(s) of permittee staff present during inspection	
Name	Title
<i>Russ Kring</i>	<i>Sewer Collections Manager</i>
Evaluator Observations:	
SWPPP or stormwater plan	
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?	YES
Does the permittee conduct and document periodic inspections of the facility?	NO
Are storm drains labeled and free of debris?	Storm Drains are free of debris.
Vehicle maintenance, fueling and washing	
Are vehicle maintenance activities conducted in a designated place not exposed to stormwater?	Vehicle maintenance is not conducted at this department.
Are fueling stations properly designed with spill kits nearby?	N/A. No fuel stations.
Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer?	Vehicles are not washed on-site.
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?	N/A. No hazardous waste stored here.
Waste management	
Are waste bins covered with waste properly disposed in containers?	The general waste dumpster is covered with a lid, but the scrap dumpsters are not covered.
How is landscape waste stored?	Landscape waste is not stored here.
Spill response	
Does the facility have a spill response plan, and are spill kits readily available?	YES
Employee training	
What type of stormwater training do maintenance staff receive?	Annual Training
Notes or additional information:	
<p>Dumpsters The general waste dumpster, located near the garage doors, is covered with a lid. There are three dumpsters located in the southeast yard that are uncovered. These dumpsters hold copper, aluminum and steel scrap separately. These dumpsters must be covered with a lid or tarp to prevent the collection of storm water and the formation of leachates.</p>	

FIELD INSPECTION WORKSHEET
MS4 SWMP Evaluation
Brookledge Golf Course Maintenance Garage Field Inspection Worksheet

Permittee: City of Cuyahoga Falls	
Address of facility: 1621 Bailey Road	Size of facility: 2 acres
Date of visit: June 12, 2013	Time of visit: 4:15 pm
Provide the name(s) and title(s) of permittee staff present during inspection	
Name	Title
<i>Russ Kring</i>	<i>Sewer Collections 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?	N/A
Does the permittee conduct and document periodic inspections of the facility?	NO
Are storm drains labeled and free of debris?	Storm Drains are free of debris.
Vehicle maintenance, fueling and washing	
Are vehicle maintenance activities conducted in a designated place not exposed to stormwater?	Vehicle maintenance is conducted inside. It is not known if the drains are connected to storm or sanitary. The inside drains must be investigated.
Are fueling stations properly designed with spill kits nearby?	NO
Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer?	YES. Vehicles are washed over a designated drain outside which is connected to sanitary.
Material storage	
Are all materials that are potential stormwater contaminants stored under cover or in secondary containment?	NO
Hazardous waste management	
Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff?	NO
Waste management	
Are waste bins covered with waste properly disposed in containers?	NO. The waste dumpster was not covered, but has a lid.
How is landscape waste stored?	Landscape waste is stored in the dumpster.
Spill response	
Does the facility have a spill response plan, and are spill kits readily available?	NO
Employee training	
What type of stormwater training do maintenance staff receive?	Annual Training
Notes or additional information:	
<p>SWPPP An SWPPP is needed for this facility due to the activities exposed to storm water. Routine inspections are also needed for the facility in compliance with the SWPPP.</p> <p>Lawnmower Washing On the southwest corner of the maintenance area, a concrete pad with a drain is used of lawnmower washing (Figure</p>	

1). This drain is connected to the sanitary sewer. A dandy bag is installed in the drain to catch grass clippings. A small pile of grass clippings is stored on the pad so the pile can dewater.

Fuel Tanks

Two fuel tanks are provided secondary containment, but the drains on each containment wall are unplugged (Figure 2). The drains must be plugged at all times so the secondary containment can perform its intended job in case of an accident. Routine inspections should be performed to ensure the control measure is adequate.

Dumpster

The general waste dumpster is uncovered and trash has been spilled around the dumpster (Figure 3). The dumpster has a lid and it must be used to cover the dumpster to prevent the collection of storm water and the formation of leachates. Good housekeeping practices are needed to address the spilled trash around the dumpster.

Oil Drums

A few oil drums are stored outside the north side of the maintenance building near the entrance from Bailey Road. A funnel is on one of the drums, which is evidence that oil is in the process of being poured into the drum. Any drum stored outside must be capped. An open drum must be stored inside or under cover and on secondary containment. A drum containing used oil must be clearly labeled "used oil". A spill kit should be available in the maintenance building in case of any spills or leaks. Staff should be aware of where the spill kit is located and trained on how to use it properly.

INSPECTION PHOTOS
Brookledge Golf Course Maintenance Garage
City of Cuyahoga Falls
Photos Taken: June 12, 2013



Fig. 1: This photo shows the lawnmower wash station. The drain is connected to sanitary sewers.

Fig. 2: This photo shows two fuel tanks kept in secondary containment. Both containments have unplugged drains. The drains must be capped.



Fig. 3: This photo shows the general waste dumpster. Good housekeeping is needed around the dumpster and the dumpster must be kept covered.

FIELD INSPECTION WORKSHEET
MS4 SWMP Evaluation
Cuyahoga Falls Service Complex Field Inspection Worksheet

Permittee: City of Cuyahoga Falls	
Address of facility: 2560 Bailey Road	Size of facility: 14.8 acres
Date of visit: June 12, 2013	Time of visit: 1:30 pm
Provide the name(s) and title(s) of permittee staff present during inspection	
Name	Title
<i>Russ Kring</i>	<i>Sewer Collections Manager</i>
Evaluator Observations:	
SWPPP or stormwater plan	
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?	The plan does include a site map, but needs updated (See Notes). BMPs are not shown.
Does the permittee conduct and document periodic inspections of the facility?	NO
Are storm drains labeled and free of debris?	Storm drains are labeled in the SWPPP. Some drains contain debris.
Vehicle maintenance, fueling and washing	
Are vehicle maintenance activities conducted in a designated place not exposed to stormwater?	YES. Vehicle maintenance is conducted inside where the floor drains connect to sanitary.
Are fueling stations properly designed with spill kits nearby?	NO
Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer?	YES. Vehicles are washed inside the wash bay in which floor drains are connected to sanitary.
Material storage	
Are all materials that are potential stormwater contaminants stored under cover or in secondary containment?	NO
Hazardous waste management	
Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff?	NO
Waste management	
Are waste bins covered with waste properly disposed in containers?	Few dumpsters are covered.
How is landscape waste stored?	Landscape waste is stored in dumpsters, uncovered.
Spill response	
Does the facility have a spill response plan, and are spill kits readily available?	The facility has a plan, but no spill kits are readily available.
Employee training	
What type of stormwater training do maintenance staff receive?	Annual Training
Notes or additional information:	
<p>SWPPP The SWPPP for the Service Complex must be updated. The Building and Grounds Department is no longer a part of this facility and must be removed from the SWPPP. The site maps of the SWPPP must also be updated to reflect the absence of the Building and Grounds Department and to correct the locations of various activities for the site. The site activities map shows the locations of the asphalt grindings stockpile in a different location than was seen during the inspection and a street sweepings pile in the Street Department yard. As discussed during the inspection, street</p>	

sweepings cannot be stored in the location specified. Sweepings must be stored in containment where the contents can dewater before being disposed in a landfill. The dewatered leachate is considered waste water and cannot be discharged offsite. It must be contained to be hauled or connected to a sanitary sewer.

Used Oil Tank

The used oil tank located outside the Water Department office is incorrectly labeled "waste oil" (Figure 1). The tank and any other collector of used oil must be labeled "used oil". A spill kit is needed in this area in case of an emergency. There are a few oil drums near the used oil tank containing oil-soaked sand. The drums are sealed. These drums must also be labeled "used oil".

Water Department Garage

The floor drains in the Water Department garage are connected to the sanitary sewer system, but the grates covering the drains are labeled as a storm sewer drain (Figure 2). These grates must be replaced and labeled correctly.

Asphalt Grindings

An asphalt grindings stockpile is located on the northeast end of the property near the Garage Department yard and Electric Department yard. A catch basin is in close proximity to the stockpile, on the edge of the parking area. A control is needed to prevent any erodible material in the stockpile to runoff into the catch basin. Inserting a dandy bag into the catch basin was discussed during the inspection. As a reminder, any control measure must be routinely inspected and maintained in order for it to be effective.

Lawn Waste Dumpsters

The lawn waste dumpsters are located on the north corner of the property. Material and debris has been spilled around the dumpster during loading operations (Figure 3). Good housekeeping procedures are needed around the dumpsters. The staff must be trained to always clean up any spills that occur. Also, the dumpsters must be covered with a lid or tarp to prevent the collection of storm water and the formation of leachates.

Building and Grounds Department Yard

In this area, some snow plows and other miscellaneous materials are stored. No leaks were seen from the snow plow hydraulic connectors, but keep in mind that they leak occasionally. Routinely inspect the stored materials for storm water contaminants. Some yard waste has been left in the yard. This must be cleaned up and placed in the dumpster.

Sanitation Department Yard

In proximity to a storm drain, which discharges west into the Cuyahoga River, there was possibly a major spill which has been covered with oil dry (Figure 4). Please be aware that just covering a spill with oil dry is not the appropriate procedure. The soaked oil dry must be swept up and placed in a sealed container labeled "used oil". Also, a number of garbage trucks are stored in this area as well and many leaks were evident (Figure 5). Many leaks are also seen outside the southeast garage doors (Figure 6). Routine inspections are needed for this area as well. Make sure the staff are always checking for any oil leaks and are trained to immediately clean it up when discovered. A spill kit is also needed in this area.

A scrap parts dumpster, located outside the northwest Sanitation Department garage doors, is not covered (Figure 7). This dumpster contains some oily parts. It must be covered with a lid or tarp to prevent the collection of storm water and the formation of leachates.

Street Department Yard

A general waste dumpster located near the northwest corner of the garage is leaking and is uncovered (Figure 8). The drain hole on the dumpster is also unplugged. This dumpster must be replaced with a better dumpster that does not leak. Make sure the drain plug is always capped. The dumpster must also be covered with a lid or tarp to prevent the collection of storm water and the formation of leachates.

A concrete truck has been washed out near the material stockpiles, leaving the washout water to dry on the ground (Figure 9). The washout is in close proximity to a storm drain. Concrete washout water must be contained, not exposing it to storm water runoff. It must be collected and able to dry before disposing of the material.

Three catch basins line the vehicle storage area of the paved area. These catch basins are connected to the storm

sewer system and discharge into the Cuyahoga River to the north. Two of the catch basins are filtered with dandy bags, but one is not. The yard is full of sediment that has the potential to runoff into these catch basins. All of the catch basins must be filtered to prevent sediment from flowing into the storm sewer. The southernmost catch basin has a filter, but the filter is full of sediment and debris. The filter must be cleaned out to ensure that it will keep performing its intended job. Routine inspections of these filters are needed to ensure that storm water controls are being maintained.

A dumpster near the material stockpiles contains paint drums and other materials (Figure 10). This dumpster was leaking some paint and oils. The dumpster was also uncovered. The dumpster must be replaced and inspected for any leaks. The dumpster must also be covered with a lid or tarp to prevent the collection of storm water and the formation of leachates.

Flammable Materials Shed

A drum containing dyed kerosene is currently in use, located inside this shed (Figure 11). Secondary containment is required for this drum in case a spill occurs. A spill kit is needed in this area in case the liquid is spilled out of containment.

Fueling Station

The fueling station requires a spill kit in case of any spills from fueling operations. A sign clearly identifying the emergency shut-off button is needed so anyone can act effectively in case of an emergency.

Used batteries are stored outside near the Garage Department building (Figure 12). Staining was seen on the ground around the batteries. The batteries must be stored inside to avoid storm water contact.

INSPECTION PHOTOS

Service Complex

City of Cuyahoga Falls

Photos Taken: June 12, 2013



Fig. 1: This photo shows the used oil tank which is incorrectly labeled "Waste Oil".

Fig. 2: This photo shows a sanitary sewer drain inside the service complex that is incorrectly labeled as a storm sewer drain. This grate must be replaced with a correctly labeled grate.



Fig. 3: This photo shows one of the yard waste dumpsters and shows the debris spilled around the dumpster. Good housekeeping procedures are needed around the dumpsters.
Fig. 4: This photo shows a large stained area where possibly a major spill occurred and a storm drain in close proximity. Oil dry was spread over this area, but not cleaned up.

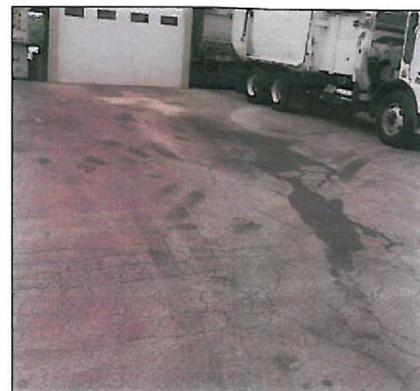
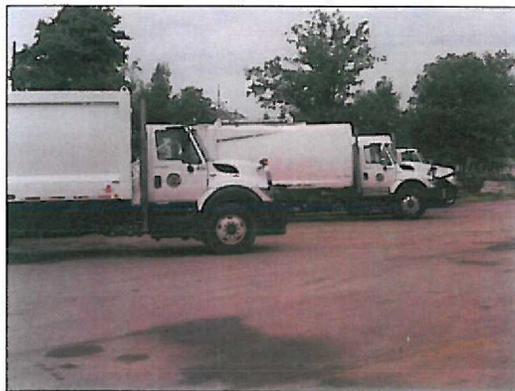


Fig. 5: Stains from leaking trucks can be seen throughout the Sanitation Department's vehicle parking area. Routine inspections of this area are needed.
Fig. 6: This photo shows more leaks from vehicles outside the southeast Sanitation Department's garage doors. Oil dry has been spread over a spill, but has not been swept up. Good housekeeping procedures and routine inspections are needed in this area as well.

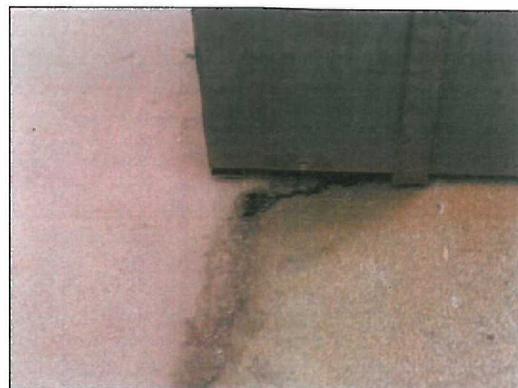


Fig. 7: This photo shows a scrap parts dumpster, outside the sanitation department garage, containing oily parts. This dumpster must be covered with a lid or tarp.
Fig. 8: This photo shows a general waste dumpster located outside the west side of the Street Department's garage. The dumpster is leaking and the drainage hole is not plugged. This

dumpster must be replaced with one that does not leak and is plugged. This dumpster was also not covered. It must be covered with a lid or tarp.



Fig. 9: This photo shows an area, located near the material stockpiles, where concrete washout water has dried. Concrete washout must be done over an area where the water can be collected and disposed of properly as waste.

Fig. 10: This photo shows materials inside a dumpster near the material stockpiles. Paint drums are disposed of in the dumpster. The dumpster was also leaking. A new dumpster is needed and a lid or tarp is needed to cover the dumpster.

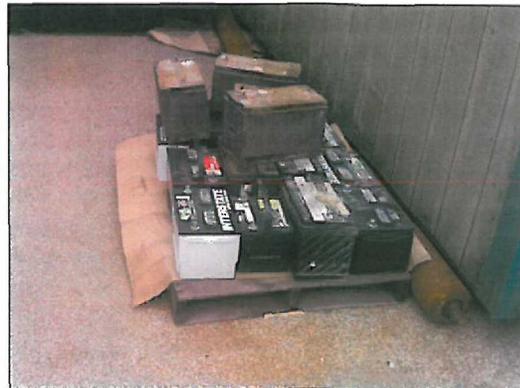


Fig. 11: This photo shows a drum of dyed kerosene stored inside the flammable materials shed. This drum is currently in use and requires secondary containment if an accident was to occur.

Fig. 12: This photo shows waste batteries that are being stored outside. The batteries must be stored inside.

FIELD INSPECTION WORKSHEET
MS4 SWMP Evaluation
Ward 8 Maintenance Area Field Inspection Worksheet

Permittee: City of Cuyahoga Falls	
Address of facility: 851 West Bath Road	Size of facility: 15.4 acres
Date of visit: June 12, 2013	Time of visit: 4:45 pm
Provide the name(s) and title(s) of permittee staff present during inspection	
Name	Title
<i>Russ Kring</i>	<i>Sewer Collections Manager</i>
Evaluator Observations:	
SWPPP or stormwater plan	
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?	YES
Does the permittee conduct and document periodic inspections of the facility?	NO
Are storm drains labeled and free of debris?	Storm Drains are free of debris.
Vehicle maintenance, fueling and washing	
Are vehicle maintenance activities conducted in a designated place not exposed to stormwater?	Vehicle maintenance is conducted inside. It is not known if the drains are connected to storm or sanitary. The inside drains must be investigated.
Are fueling stations properly designed with spill kits nearby?	NO
Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer?	YES. Vehicles are washed over a designated drain outside which is connected to sanitary.
Material storage	
Are all materials that are potential stormwater contaminants stored under cover or in secondary containment?	NO
Hazardous waste management	
Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff?	NO
Waste management	
Are waste bins covered with waste properly disposed in containers?	NO. The waste dumpster was not covered, but has a lid.
How is landscape waste stored?	Landscape waste is stored in the dumpster.
Spill response	
Does the facility have a spill response plan, and are spill kits readily available?	Does have a spill response plan, but no spill kits.
Employee training	
What type of stormwater training do maintenance staff receive?	Annual Training
Notes or additional information:	
<p>Dumpster The general waste dumpster near the fire station is uncovered and full of waste (Figure 1). There is also trash scattered around the dumpster as well. The dumpster has a lid and must be covered to prevent the collection of storm water and the formation of leachates. The dumpster is too small for the amount of waste being disposed. A second dumpster or a larger dumpster is necessary.</p>	

Fuel Tank

The diesel fuel tank is located near the salt dome. It is not in secondary containment, although it is double-walled. A spill kit is needed in this area in case a spill occurs. Also, The emergency shut-off button should be clearly identified with a sign.

Brine Tanks

Seven brine storage tanks are stored near the salt dome. These tanks are not in secondary containment. Secondary containment should be provided along with a spill kit in case of any manageable spills.

Ditch Cleanings

A pile of ditch cleanings is located in the yard near the salt dome (Figure 2). This pile is just soil and it is erodible. The soil can be seeded so to grow vegetation, stabilizing the soil. This is a good practice to prevent erosion. If seeding is not an option, the pile must be kept under cover with a tarp or roof.

INSPECTION PHOTOS
Ward 8 Maintenance Area
City of Cuyahoga Falls
Photos Taken: June 12, 2013



Fig. 1: This photo shows the general waste dumpster near the fire station. The trash is uncovered, overflowing and there is trash scattered around the dumpster.

Fig. 2: This photo shows a stockpile of ditch cleanings.