



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

August 27, 2013

RE: GEAUGA COUNTY  
BAINBRIDGE TOWNSHIP  
MUNICIPAL STORM WATER  
MCM #6 INSPECTION  
3GQ00088\*BG

Joseph Cattell, P.E., P.S.  
Geauga County Engineer  
470 Center St., Bldg. 4  
Chardon, OH 44024

**NOTICE OF VIOLATION**

Dear Mr. Cattell:

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 July 10, 2013, Ohio EPA met with you and other representatives of Bainbridge Township and Geauga County to determine compliance with the NPDES permit and its associated Storm Water Management Plan (SWMP). In performing this audit, Ohio EPA implemented the Municipal Storm Water Program Evaluation Guide developed by the United States Environmental Protection Agency.

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 provide controls (BMPs) for reducing or eliminating the discharge of pollutants from the Road Department.** 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 keep dumpsters covered to prevent the discharge of wastewater to the Township's MS4.
  - Failure to implement sediment controls around material stockpiles throughout the Road Department complex.
  - Failure to properly label used oil containers at the Road Department. Containers of used oil must be labeled "Used Oil" per OAC 3745-279.

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 identify the source(s) of illicit discharge and eliminate sources not listed in Part III.B.3.g of NPDES permit.** This is a violation of Part III.B.3.e of the NPDES permit and ORC 6111.04 and 6111.07. Dry-weather screening revealed the existence of at least 14 possible illicit discharges according to the annual report. However, the Township indicated that they have not conducted follow-up investigations on all of these discharges to determine the sources of dry-weather flows and determine if the sources are authorized under Part III.B.3.g of the NPDES permit. For sources not authorized by the NPDES permit or included in the SWMP as an authorized occasional stormwater discharge, the City must take steps to eliminate them. Please provide me with a plan to investigate the sources of dry-weather flow identified, including a timeframe by which to complete each investigation. If the source of dry-weather flow is indeed an illicit discharge, please provide your plan to eliminate these sources or the steps you have taken to eliminate these sources in the Annual Report for 2013, due April 1, 2014.
- **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 Bainbridge Township still has an active permit under the Ohio EPA General Storm Water NPDES Permit for Construction Activities at two (2) municipal sites, which the Township indicated were completed and have reached final stabilization. ***Please submit an NOT for the following projects immediately:***
  - Kenston Lake Stream Restoration
    - Permit No. 3GC05509\*AG
  - Restland Cemetery
    - Permit No. 3GC03539\*AG

### Deficiencies

- 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). Please ensure that a map of the MS4 is produced no later than January 29, 2014. The Township's current map is based on the urbanized area specified by 2000 census. It must be updated to reflect the 2010 census.
- The Township has mapped their privately-owned storm water management facilities which also includes those located outside the urbanized area. The NPDES permit covers storm water affected in the urbanized area. The Ohio EPA recommends that the Township create a map showing the locations of privately-owned storm water management facilities inside the urbanized area.

- The Township has not provided any stormwater 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 stormwater BMPs should improve.
- The linkage between the MS4 program and the Health Department is weak and communication needs to be improved. The Health Department reports the number of point-of-sale inspections done township-wide and the number of permits for replacement systems township-wide. This information must be broken down into inspection and permits inside and outside the urbanized area. This way, the Township would be able to receive information concerning their MS4 program.
- The Township must contact the wastewater treatment plant (WWTP) operators to determine if sanitary sewer overflows (SSOs) have occurred in the past. Incidents should be communicated by the WWTP to the Township's MS4 operator if an overflow discharges into the Township's MS4. This is an illicit discharge.

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 30, 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](mailto:robert.hrusovsky@epa.ohio.gov).

Sincerely,



Bobby Hrusovsky  
Assistant to the District Engineer  
Division of Surface Water

BH:ddw

Enclosure

cc: Jeff Markley, Trustee, Bainbridge  
Carmella Shale, District Director/Engineer, Geauga County SWCD  
Jim Stanek, Service Director, Bainbridge  
ec: Dan Bogoevski, Ohio EPA, DSW, NEDO

## Municipal Storm Water Program Evaluation MS4 Maintenance Component Worksheet

<b>Date of Evaluation</b>	July 10, 2013
<b>Evaluator Name, Title</b>	Bobby Hrusovsky, DSW, NEDO
<b>MS4 Permittee</b>	Bainbridge Township, 3GQ00088*BG (Geauga County and Others)

**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
Joe Cattell	Geauga County Engineer	(440) 279-1800 jcattell@co.geauga.oh.us
Jeff Markley	Bainbridge Twp. Trustee	jmarkley@bainbridgetwp.com
Carmella Shale	Geauga SWCD	(440) 834-1128 cshale@geaugaswcd.com
Jim Stanek	Bainbridge Twp.	(440) 543-9871 jstanek@bainbridgetwp.com
John Brett	Bainbridge Twp.	(440) 543-9874 jbrett@bainbridgetwp.com
Andy Haupt	Geauga County Engineer	ahaupt@co.geauga.oh.us
Timothy Bloxson	Bainbridge Service Dept.	(440) 543-9874

MS4 Mapping			
Interview Questions		Response	
Outfalls and receiving waters mapped?		YES, based on 2000 census.	
Catch basins?		NO	
Pipes, ditches, other conduits?		YES	
Public stormwater facilities (BMPs)?		N/A, the Township does not have any.	
Private stormwater facilities (BMPs)?		YES, on separate map.	
How are maps used (i.e. tracking illicit discharges)?		Maps are used to determine visual tracking for illicit discharges.	
Applicable Documents		Reviewed	Obtained
Map(s) of MS4 system		YES	YES

Notes
<p><b>MS4 Mapping</b> To meet the mapping obligations of NPDES Permit #OHQ000002, i.e., the MS4 permit in effect from 2009-2014, the map must show <i>catch basins</i> and <i>publicly-owned storm sewers, ditches, conduits</i> and</p>

<b>Notes</b>
<p>storm water management facilities. In addition, the map must show <i>privately-owned storm water management facilities</i> constructed as post-construction BMPs for new development or redevelopment which has occurred since April 21, 2003. This comprehensive map must be completed by the end of your current NPDES permit coverage term, i.e., April 1, 2014.</p> <p>The Township has mapped their privately-owned storm water management facilities, also those located outside the urbanized area. The NPDES permit covers storm water affected in the urbanized area. The Ohio EPA recommends that the Township create a map showing the locations of privately-owned storm water management facilities inside the urbanized area.</p> <p>The Township has mapped their MS4 system according to the 2000 census urbanized area. The maps must be updated to reflect the 2010 census urbanized area.</p> <p><b><u>Illicit Discharge Investigation &amp; Elimination</u></b>  The Township has identified 14 dry-weather flows, but has not followed-up on those flows to test for possible illicit discharges. The Township intends to complete the follow-ups by the end of 2013.</p> <p>Please be aware that the NPDES permit #OHQ000002 requires the Township to perform dry weather screening at all outfalls at least once by June 2014 and that a plan must be in place to perform a follow-up illicit discharge investigation <i>where any dry-weather flows are detected</i>. Permissible non-storm water discharges from the MS4 are listed in Part I.B.3.b of the NPDES permit. If dry-weather flow is not attributable to one of these permissible sources, the source is an illicit discharge and the Township must take action under the local illicit discharge ordinance to eliminate it. For sources not eliminated by the next Annual Report, the Village must submit a list of known illicit discharges and a plan for their elimination (action and timeframe to complete) with the Annual Report. For illicit discharges from HSTs, please read Part III.B.3.e of the Ohio EPA General Storm Water NPDES Permit for small MS4s #OHQ000002 for expectations to address these sources.</p>

<b>Catch Basin Cleaning</b>		
<b>Interview Question</b>	<b>Response</b>	
Schedule established for inspections and cleaning?	<b>NO</b> Does not inspect or clean.	
Is cleaning and maintenance of catch basins tracked:	N/A	
How are spoils materials disposed of?	N/A	
Are storm drain pipes inspected?	<b>NO</b>	
Proactive or only in response to blockage event?	Not proactively, but would respond to a complaint or blockage event. The Township could not recall any incidents in the past.	
<b>Applicable Documents</b>	<b>Reviewed</b>	<b>Obtained</b>
List of active municipal construction projects  <i>There was one active municipal construction project at the time of inspection, Town Hall which is outside the urbanized area.</i>  <b>NOTE:</b> Permit is only required if project disturbs 1 or more acre (5 or more acres for "routine maintenance")	<b>YES</b>	<b>YES</b>

<b>Notes</b>
<p><b><u>Municipal Construction Projects</u></b>  Three municipal construction projects still have an active permit according to the Ohio EPA's database:</p>

Kenston Lake Stream Restoration (3GC05509\*AG), Restland Cemetery (3GC03539\*AG), and Town Hall (3GC05544\*AG). The city noted that all but the Town Hall project have been completed and have reached final stabilization. If construction is complete or the project is no longer viable, a Notice of Termination (NOT) must be submitted for these projects to close out NPDES permit coverage. **This is a violation of Part IV.A of the Ohio EPA General Storm Water NPDES permit #OHC000003.** The NOT and instructions can be obtained on the Ohio EPA Storm Water Program webpage at [www.epa.ohio.gov/dsw/storm/stormform.aspx](http://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.

In the future, Geauga Soil and Water Conservation District (SWCD) will send a notification to the Township trustees when an NOT needs to be submitted.

**MS4 System Repair and Maintenance**

Proactive inspections of the Township'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 the Township's MS4 program and reduce pollutants.

Stormwater Management Facilities Operation and Maintenance			
Interview Questions		Response	
Public facilities inspected?		<b>N/A</b>	
Frequency:		The Township has no public facilities, only private.	
Private facilities inspected?		<b>YES</b>	
Frequency:		Every other year. All facilities are inspected (from 1979 to present). Includes ponds, bioretention, permeable pavement, etc.	
Checklist used for inspections?		<b>YES</b>	
Have maintenance standards and procedures been established for these facilities?		<b>YES</b> There is an operation and maintenance (O&M) plan for each facility. O&M plans are recorded with the Recorder's Office and transfers with property transfers.	
How is maintenance prioritized? Is data evaluated to target maintenance resources?		If a problem occurs, the Township will address with enforcement, but all others are inspected every other year.	
Applicable Documents		Reviewed	Obtained
Inspection checklist		YES	YES

Notes

Road Maintenance	
Interview Questions	Response
Streets regularly swept?	<b>NO</b>
Frequency:	The Township does not conduct street sweeping and does not plan to conduct in the future. The SWMP does not comment

Road Maintenance	
Interview Questions	Response
	Bainbridge to conducting it.
Frequency based on water quality factors (e.g. proximity to streams)?	N/A
How are spoils disposed of?	N/A
Does the community collect road kill?  What do they do with the carcasses?  <b>NOTE:</b> 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.	<b>YES</b>  This is not a proactive program, but if a resident calls in a complaint, the Township will contract out to pick up the carcass.
Does the community have a leaf collection program?  What do they do with the collected leaves?  <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.	<b>NO</b>
BMPs used during road maintenance activities?      Describe types of road maintenance conducted by community staff and the BMPs used	<b>NO</b>  The Township does not implement BMPs during road maintenance activities except during ditch cleaning. Ditches are hydroseeded after cleaning, but not within 7 days. The soil is stabilized within about a month.  Full-depth pavement repairs, berming, ditch cleaning.
BMP guidance available to field staff?	<b>NO</b> Geauga County is working on developing field guidance.
Deicers used by MS4?	<b>YES</b>
Type and amount of deicer and additives tracked?      What measures are being taken to minimize the application of deicers?	Road Salt. Brine is also used to pre-wet the road salt which reduces the quantity of salt used and reduces scatter when the salt hits the roadways. Cinders are rarely used.  The Township plans to experiment with Clearlane and beet juice this year.  Trucks are actively calibrated.
Sand/salt swept up after application?	<b>YES</b>

Road Maintenance			
Interview Questions	Response		
How soon?	Once a day, the salt is swept up around the salt dome. If a spill occurs on the roadways and is reported by the driver, a crew is sent out to clean it up.		
Does your community operate a snow stockpile yard to store snow that has been removed from community streets and parking lots?	NO		
If YES, location of the yards:			
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		N/A	N/A
Deicer application records		NO – do not report quantity	NO

Notes
<p><b>Deicing</b></p> <p>The Township does not track the amount of salt used, but the amount of salt purchased. The Township intends to improve their system to keep track of salt usage beginning in the 2013-2014 snow season. Purchase receipts were reviewed. (Estimated usage was about 2600 tons for the year 2012) Please be aware that the Annual Report requires information to be reported on a <b>January to December calendar year basis</b>. 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 Township is required to track salt usage as well as the use of additives, i.e., brine, beet juice.</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, which the Township currently performs, 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>

Flood Management	
Interview Questions	Response
Inventory of flood management structures completed?	NO None in township
Structures been assessed for stormwater retrofit?	N/A
New structures include water quality considerations?	Discussed if the Township plans to construct a flood management structure in the future that

Flood Management		
Interview Questions	Response	
	they use water quality factors in the design.	
Applicable Documents	Reviewed	Obtained
Inventory	N/A	N/A

Notes

Facilities Operation & Maintenance														
Interview Questions	Response													
Inventory of MS4 facilities complete (i.e. facilities owned and operated by the MS4)?	YES													
<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 ≥ 1 MGD or with a pretreatment program</li> </ul>	<table border="1"> <thead> <tr> <th>Response</th> <th>SWP3 Developed</th> </tr> </thead> <tbody> <tr> <td>NO</td> <td>N/A, since do not operate</td> </tr> </tbody> </table>	Response	SWP3 Developed	NO	N/A, since do not operate	NO	N/A, since do not operate	NO	N/A, since do not operate	NO	N/A, since do not operate	NO	N/A, since do not operate	<p><b>NOTE:</b> No permit or SWP3 required if facility has no exposure. However, even if a No Exposure Certification has been submitted for the facility, inspect to verify validity.</p>
Response	SWP3 Developed													
NO	N/A, since do not operate													
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<p><i>These do not need their own permit, but do have to develop an SWP3 unless noted as N/A:</i></p> <ul style="list-style-type: none"> <li>Impound Lots</li> <li>Leaf Collection Yards <ul style="list-style-type: none"> <li>✓ No discharge of leafate permitted</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:</li> </ul> <p style="text-align: center;"><b>Bainbridge Twp. Road Dept.  17800 Haskins Rd.  Chagrin Falls, OH 44023</b></p> </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</li> </ul> </li> </ul>	<table border="1"> <thead> <tr> <th>Response</th> <th>SWP3 Developed?</th> </tr> </thead> <tbody> <tr> <td>NO</td> <td>N/A, since do not operate</td> </tr> <tr> <td>NO</td> <td>N/A, since do not operate</td> </tr> <tr> <td>YES</td> <td>YES</td> </tr> </tbody> </table>	Response	SWP3 Developed?	NO	N/A, since do not operate	NO	N/A, since do not operate	YES	YES	<p>The Township does have a recycle center at the Road Department.</p>				
Response	SWP3 Developed?													
NO	N/A, since do not operate													
NO	N/A, since do not operate													
YES	YES													

Facilities Operation & Maintenance	
Interview Questions	Response
<p>the facility is involved with recycling or composting</p> <ul style="list-style-type: none"> <li>• Parks &amp; Cemeteries <ul style="list-style-type: none"> <li>➤ How many in UA? <u>  1  </u></li> <li>➤ List facility names/locations:</li> </ul> <p style="text-align: center;"><b>Settlers Park</b> <b>17800 Haskins Rd.</b> <b>Chagrin Falls, OH 44023</b></p> </li> <li>• Parking Lots <ul style="list-style-type: none"> <li>➤ How many do they operate? <u>  1  </u></li> <li>➤ List facility name/locations:</li> </ul> <p style="text-align: center;"><b>Settlers Park</b></p> </li> <li>• Bus Terminals</li> <li>• Vehicle Maintenance Garages <ul style="list-style-type: none"> <li>➤ How many do they operate? <u>      </u></li> <li>➤ List facility name/locations:</li> </ul> </li> </ul>	<p><b>YES</b>                      <b>N/A, since no vehicle maintenance occurs</b></p> <p>A separate building is located in the park used to store fertilizers and field conditioner (absorbent to soak up water for baseball fields), but no vehicle maintenance occurs here.</p> <p><b>YES</b>                      <b>N/A</b></p> <p><b>NO</b>                         <b>N/A, since do not operate</b> <b>NO</b>                         <b>N/A, since do not operate</b></p> <p>Vehicle maintenance is conducted at the Road Department.</p>
Facilities inspected?	<b>YES</b>
Frequency:	Road Dept. is inspected quarterly. The SWP3 specifies the facilities should be inspected annually with a preference to quarterly. The Township must conduct at least one inspection during 2013 to stay in compliance with their SWP3. The Township has not conducted an inspection yet this year.
Checklist used?	<b>YES</b>
Staff which perform the inspections (department or agency):	Walter Rudyk, Highway Superintendent, has conducted the inspections in the past.  Acting Highway Superintendent, Jim Stanek, will be conducting the inspections in the future.
Is there a designated stormwater contact person for each facility?	<b>YES</b> Jim Stanek
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?:	The procedure would follow a progressive system: <ul style="list-style-type: none"> <li>- Verbal</li> <li>- Written verbal</li> <li>- Written, then per Service Director and Trustees</li> </ul> No such situation has occurred in the past, but the Township's personnel policy manual would be used.
Parking lots owned/operated by the permittee swept?	<b>NO</b>

<b>Facilities Operation &amp; Maintenance</b>	
<b>Interview Questions</b>	<b>Response</b>
<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><b>NOTE:</b> Some MS4s have banned the use of coal tar-based sealants in their communities. Research from the University of New Hampshire Stormwater Center and by the City of Austin, TX, has shown these sealants contaminate soil and runoff with PAHs and benzo(a)pyrene, a known carcinogen. If a sealant must be used, asphalt-based sealants are preferred.</p>	<p>N/A, lot is not paved.</p> <p style="text-align: center;"><b>NO</b></p> <p style="text-align: center;">N/A</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 style="text-align: center;"><b>NO</b></p> <p style="text-align: center;">N/A</p> <p style="text-align: center;"><b>NO</b></p> <p>Off-lot dischargers are inspected annually: point-of-sale program for all systems. Township does have a map identifying lots with off-site discharges, but do not know which ones are failing. The health department has not started testing in Bainbridge Twp. for HSTS cross connections.</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 style="text-align: center;"><b>NO</b></p> <p>Not expected to be a source. The Township does not have many storm sewers, but mostly ditches. There are not very many sanitary sewers inside the urbanized area. There are no inspections conducted on on-lot systems, unless at point-of-sale or a complaint. The Township does not know which on-lot systems are failing.</p> <p style="text-align: center;">N/A</p> <p style="text-align: center;">N/A</p>
<p>Sewer spill and cleanup procedures in place?</p>	<p style="text-align: center;"><b>NO</b></p> <p>The Township is not aware of any sanitary sewer overflows (SSOs), though there is little communication between the Township and the wastewater treatment plant (WWTP).</p>

Facilities Operation & Maintenance			
Interview Questions		Response	
Applicable Documents		Reviewed	Obtained
Facility inventory		YES	YES
Facility SWPPP		YES	YES

Notes
<p><b><u>Communication with Health Department</u></b>  The linkage between the MS4 program and the Health Department is weak and communication needs to be improved. The Health Department reports the number of point-of-sale inspections done township-wide and the number of permits for replacement systems township-wide. This information must be broken down into inspection and permits inside and outside the urbanized area. This way, the Township would be able to receive information concerning their MS4 program.</p> <p><b><u>Communication with the WWTP</u></b>  The Township must contact the WWTP operators to determine if SSOs have occurred in the past. Incidents should be communicated by the WWTP to the Township's MS4 operator if an overflow discharges into the Township's MS4. This is an illicit discharge.</p>

Pesticides, Herbicides & Fertilizers			
Interview Questions		Response	
Certified applicators used?		YES Fertilizing is contracted out to JFD Landscapes. No pesticides or herbicides are used.	
Integrated Pest Management (IPM) practices used?		The Township is not sure if they do or not.	
Storage location of pesticides, herbicides, and fertilizers:		Fertilizer is kept in small amounts inside the building at Settlers Park.	
BMPs used during application:		The Township does not know if storm water BMPs are used during application. Geauga County SWCD is working on developing educational materials. The Township signs a two-year contract with JFD Landscapes. The Ohio EPA encourages the Township to include a requirement to implement storm water BMPs to the contract.	
Fertilizer/pesticide application plan utilized?		The Township is not sure. The contractor has a plan, but it was not shown to us. The Township believes the application is about four times a year.	
Applicable Documents		Reviewed	Obtained
Fertilizer/pesticide application plan		NO	NO

Notes
<p>The Township does not use pesticides or herbicides, only fertilizers.</p> <p><b><u>Application Plan</u></b>  Records should keep track of the name of the substance being applied and the type of chemical, where it is being applied, the amount used, time the material is being applied and the name of the person applying the fertilizer. When using a contractor to apply fertilizers, the <i>City needs to include language in the contract that requires the contractor to implement pollution controls where the activities undertaken are a potential source of storm water pollution.</i></p>

Notes
<p><b><u>BMPs for Pesticide, Herbicide and Fertilizer Application</u></b></p> <p>Pesticides, herbicides and fertilizers should not be applied when the forecast calls for rain. The label of most products will provide guidance on when and how much of these materials should be applied. Do not exceed manufacturers' recommendations. In addition, crews must be trained to avoid overspray and to implement dry clean-up methods should spills occur. Under no circumstance should crews hose spilled materials into storm drains. Storm drains near application areas can be temporarily covered to prevent overspray or spills from entering the MS4. The usage of fertilizers can also be reduced by replacing typical lawn-type grasses with natural, slow-growing grass species that require less or no fertilizers to be sustained. The City of Cleveland is using this method to revegetate neighborhoods where blighted homes have been razed. This will reduce costs to the City to maintain this new greenspace.</p>

Standards, BMPs, & Outreach		
Interview Questions	Response	
BMP technical guidance document available to maintenance staff?	NO	
MS4 use contractual staff to complete MS4 maintenance activities?	<p style="text-align: center;">YES</p> <p>Large-scale activities such as guard rail maintenance and major road construction.</p>	
BMP guidance materials provided to contracted staff?	<p style="text-align: center;">YES</p> <p>A SWP3 is required for major road projects. No guidance materials given to fertilizer applicators, but Geauga County plans to have material to be provided.</p>	
Requirement to consider stormwater impacts and utilize appropriate BMPs in contracts?	NO	
Materials used to educate the public regarding stormwater impacts on MS4 property (if applicable, i.e. public spaces):	<p>There are rules on the Township's website for Settlers Park.</p> <p><b>Pet waste:</b> Pick-up stations, rules are on the website, and a rules sign on the property.</p> <p><b>Litter reduction:</b> Trash cans are around the park. Can be improved by adding signage to the trash cans about storm water contamination.</p>	
Applicable Documents	Reviewed	Obtained
BMP manual or guidance document	NO	NO
Contract language for MS4 operation and maintenance activities	NO	NO

Notes
<p><b><u>Technical Guidance and Specifications for Maintenance Staff</u></b></p> <p>Ohio EPA suggests the following improvements to disseminate technical guidance on storm water pollution prevention matters to the Road Department and other maintenance staff. 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. The Lake County (OH) Stormwater Management Department has developed a nice poster that can be customized for your community and hung in the Service Garage. This will help reinforce employee training.</p> <p>Other existing guidance materials you may find useful to meet this goal include the <i>Rainwater and Land Development</i> manual (ODNR, 2006) available online at <a href="http://www.dnr.state.oh.us/tabid/9186/Default.aspx">http://www.dnr.state.oh.us/tabid/9186/Default.aspx</a> and the <i>Municipal Pollution Prevention/Good</i></p>

Notes
<i>Housekeeping Manual #9</i> (Center for Watershed Protection, September 2008). This manual is available as a free download on the US EPA website at <a href="http://cfpub.epa.gov/npdes/stormwater/munic.cfm">http://cfpub.epa.gov/npdes/stormwater/munic.cfm</a> .

Staff Education and Training		
Interview Questions	Response	
Staff trained to identify potential storm water pollution sources which would result in an illicit discharge?  Frequency:	YES  Once a year.	
Materials used to train staff:	Excal Visual Video – Spill Prevention and Control and Countermeasure Plan. Geauga County facility inspection form.	
Applicable Documents	Reviewed	Obtained
Training materials	YES	YES

Notes

**FIELD INSPECTION WORKSHEET**  
**MS4 SWMP Evaluation**  
**Road Department Field Inspection Worksheet**

<b>Permittee: Bainbridge Township</b>	
<b>Address of facility: 17800 Haskins Road</b>	<b>Size of facility: 6 acres</b>
<b>Date of visit: July 10, 2013</b>	<b>Time of visit: 1:00 PM</b>
<b>Provide the name(s) and title(s) of permittee staff present during inspection</b>	
<b>Name</b>	<b>Title</b>
<i>Jim Stanek</i>	<i>Service Department</i>
<i>John Brett</i>	<i>Road Department Foreman</i>
<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?	YES
Does the permittee conduct and document periodic inspections of the facility?	YES, but has not done one in 2013. Two inspections performed in 2012. SWP3 requires a minimum of one per year.
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. Vehicle maintenance activities occur inside where the drains connect to an oil/water separator then to a septic tank.
Are fueling stations properly designed with spill kits nearby?	YES
Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer?	YES. Vehicles are washed inside where the drains connect to the septic tank.
<b>Material storage</b>	
Are all materials that are potential stormwater contaminants stored under cover or in secondary containment?	NO. A gasoline fuel tank and used oil tank are not within secondary containment. Stockpiles of erodible material are not under cover.
<b>Hazardous waste management</b>	
Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff?	NO. One used oil container was improperly labeled "waste oil". Some used oil containers were not labeled.
<b>Waste management</b>	
Are waste bins covered with waste properly disposed in containers?	NO. The construction/demolition debris and scrap metal bins are not covered.
How is landscape waste stored?	Stored in the secondary outside storage area. Storm water BMP improvements are needed.
<b>Spill response</b>	
Does the facility have a spill response plan, and are spill kits readily available?	YES. There is a plan and spill kits are readily available.
<b>Employee training</b>	
What type of stormwater training do maintenance staff receive?	Annual
<b>Notes or additional information:</b>	
<b>Used Oil</b>	
A used oil tank, located outside the west wall of the maintenance shop, is improperly labeled "Waste Oil" (Figure 1). Any container carrying used oil must be labeled "Used Oil". A caddy container, used to transfer the used	

oil to the tank, is not labeled (Figure 2). This must be labeled "Used Oil".

An oil drum containing used oil filters is located outside the garage doors of the maintenance shop (Figure 3). The oil drum is lidded with rubber mats. After a discussion with the Ohio EPA Division of Materials and Waste Management, there is not limit on how long the used oil filters can be stored or how many can be accumulated. However, this container must be labeled "Used Oil".

### **Material Stockpiles**

Asphalt-paved storage bins are currently being constructed along the west side of the property (Figure 4). These bins will hold various materials. A few stockpiles of materials are being stored, near the bins, temporarily until the bins are completed (Figure 5). Some of the stockpiles contain erodible material. These stockpiles must be stored under cover or covered with a tarp to prevent erodible material from being washed away as runoff. We recommend that the Township install hoop covers over the bins being constructed as a more permanent structure so to keep the materials under cover.

A large asphalt grindings stockpile is located in the northwest corner of the property. This pile is in close proximity to a drainage channel to the north (Figure 6). The pile must be pulled back to prevent the material from entering the drainage channel. A few piles of spoils materials are located near the asphalt grindings pile (Figure 7). These piles are also in close proximity to the drainage swale. They must be pulled back away from the drainage channel and must either be stored under cover or encircled with silt fence to prevent sediment erosion.

Yard waste, spoils and other material stockpiles are kept in the secondary outside storage yard (Figure 8). The yard waste piles, if stored for a long enough period of time, can start to decompose and produce leachate, which is a wastewater. The yard waste must be taken to a licensed composting facility as soon as possible. Other stockpiles in the yard contain erodible materials which runoff during a rain event. The yard does not have any controls to reduce storm water pollution. During a rain event, these pollutants get picked up as runoff and travel north along the entrance driveway and into a ditch along the entrance road for Settlers Park, flowing toward Haskins Road (Figure 9). The yard must be designed to drain to a sediment pond before discharging off the property.

### **Outfalls**

Evidence of pollutants was seen tracked out of the outfall north of the secondary salt and cinders building (Figure 10). The catch basin outside that building connects to this outfall. The staining is orange and appears to be iron bacteria. Also, there is some evidence of erosion under the down spout of the roof drain from the secondary salt and cinders building (Figure 11). A splash block should be installed to prevent further erosion.

During the rain event that occurred during the inspection, sheet flow from the parking lot flowed into a ditch near the Road Department entrance gate (Figure 12). This flow of concentrated sheet flow must be listed as another storm water outfall from the Road Department's property.

### **Dumpsters**

A construction and demolition debris dumpster and a metal scrap dumpster are located north of the Road Department Cold Storage Building (Figure 13). These dumpsters are not covered. They must be covered with a lid or tarp to prevent the collection of storm water and the formation of leachates.

### **Recycle Area**

The community resident recycle area, located near the entrance gate, requires some good housekeeping. Minor spills of recycle materials were seen around the recycle dumpsters. Good housekeeping practices can be implemented by inspecting and sweeping the area on a daily basis.

INSPECTION PHOTOS  
Road Department  
Bainbridge Township  
Date Taken: July 10, 2013



Fig. 1 (Left): This photo shows a used oil container mislabeled "Waste Oil". This container must be labeled "Used Oil".

Fig. 2 (Right): This photo also shows a used oil container, but it is not labeled. Any container used to hold used oil must be labeled "Used Oil".



Fig. 3 (Left): This photo shows an oil drum containing used oil filters and lidded with rubber mats. The drum must be labeled "Used Oil".

Fig. 4 (Right): This photo shows asphalt-paved storage bins that are currently being constructed to store stockpiles of materials.



Fig. 5 (Left): This photo shows some material stockpiles located along the west side of the property. Some materials are erodible. These materials must be kept under cover or covered with tarps.

Fig. 6 (Right): This photo shows the north side of the asphalt grindings stockpile which is in close proximity to a drainage channel. The grindings must be pulled back further away from the drainage channel.



Fig. 7 (Left): This photo shows a few piles of spoils materials located near the asphalt grindings stockpile. These piles also need to be pulled away from the drainage channel and must either be stored under cover or encircled with silt fence to prevent erosion.

Fig. 8 (Right): This photo shows the secondary outside storage yard and shows some stockpiles of yard waste and other spoils materials. This area should be designed to drain into a sediment basin before storm water is discharged from the yard.

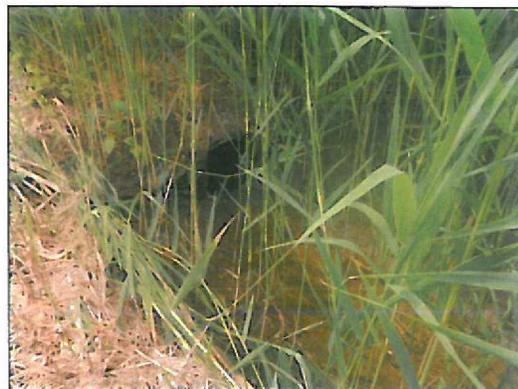


Fig. 9 (Left): This photo shows drainage from the secondary outside storage yard, containing runoff, entering the ditch along the entrance to Settlers Park during a rain event.

Fig. 10 (Right): This photo shows the outfall from the catch basin located near the secondary salt and cinders building. Orange staining is seen in the flow path which appears to be iron bacteria.



Fig. 11 (Left): Some erosion is evident under the downspout of the roof drain on the secondary salt and cinders building. A splash block should be added to prevent further erosion.

Fig. 12 (Right): This photo shows concentrated sheet flow coming from the parking lot near the gas tank and entrance to the service yard. This should be mapped as another outfall from the property.



Fig. 13: This photo shows the construction and demolition debris dumpster which is uncovered. This dumpster and the scrap metal dumpster must be covered with a lid or tarp to prevent the collection of storm water and the formation of leachates.

**FIELD INSPECTION WORKSHEET**  
**MS4 SWMP Evaluation**  
**Settlers Park Field Inspection Worksheet**

<b>Permittee:</b> Bainbridge Township	
<b>Address of facility:</b> 17800 Haskins Road	<b>Size of facility:</b> 10 acres
<b>Date of visit:</b> July 10, 2013	<b>Time of visit:</b> 3:00 PM
<b>Provide the name(s) and title(s) of permittee staff present during inspection</b>	
<b>Name</b>	<b>Title</b>
<i>Jim Stanek</i>	<i>Service Department</i>
<i>John Brett</i>	<i>Road Department Foreman</i>
<b>Evaluator Observations:</b>	
<b>SWPPP or stormwater plan</b>	
Has the maintenance facility developed a SWP3 or stormwater plan?	YES, although a SWP3 is not necessary for this facility.
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?	YES
<b>Vehicle maintenance, fueling and washing</b>	
Are vehicle maintenance activities conducted in a designated place not exposed to stormwater?	N/A, all vehicle maintenance is conducted at Road Department
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
<b>Material storage</b>	
Are all materials that are potential stormwater contaminants stored under cover or in secondary containment?	YES
<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?	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, plan is in SWP3. No spill kit in building. No liquid materials stored.
<b>Employee training</b>	
What type of stormwater training do maintenance staff receive?	Annual
<b>Notes or additional information:</b>	
<p>No vehicle maintenance is conducted at the Settlers Park facility. Only fertilizer and field conditioner is stored in the building. It was noted that staff occasionally power washes the floor of the pavilion. The pavilion must not be power washed in order to reduce the spread of pollutants. Use a rag and wipe spots that need cleaned. Also, implement dry sweeping methods if needed.</p>	