



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

July 26, 2013

RE: CUYAHOGA COUNTY
VILLAGE OF CHAGRIN FALLS
MUNICIPAL STORM WATER
MCM #6 INSPECTION
3GQ00108*BG

Ben Himes
Village Administrator
Village of Chagrin Falls
21 West Washington Street
Chagrin Falls, OH 44022

NOTICE OF VIOLATION

Dear Mr. Himes:

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 3, 2013, Ohio EPA met with you and other representatives of the Village of Chagrin Falls 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.

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

Violations

- **Failure to obtain NPDES permit coverage for storm water discharges associated with industrial activity from the Wastewater Treatment Plant.** This is a violation of Ohio Revised Code (ORC) 6111.04 and Ohio Administrative Code 3745-38-09. Although the Village had submitted a No Exposure Certification (NOE) to Ohio EPA for the wastewater treatment plant, our inspection revealed that the facility does not qualify for a no exposure exemption. If you would like to add storm water language to the existing NPDES permit for wastewater discharges from the plant, please submit Form 2F of the individual NPDES permit application. Form 2F can be found at http://epa.ohio.gov/portals/35/permits/NPDES_Form_2f.pdf. You may also obtain coverage under the Ohio EPA General NPDES Permit for Storm Water Associated with Industrial Activities #OHR000005 by submitting a Notice of Intent (NOI). The NOI application can be found at http://epa.ohio.gov/Portals/35/storm/Industrial_Storm_MSGP_NOI.pdf. In either case, a Storm Water Pollution Prevention Plan (SWP3) will need to be developed and implemented for this facility.

- **Failure to provide controls for reducing or eliminating the discharge of pollutants from municipal operations.** This is a violation of Part III.B.6.d.iii.2 of the Small MS4 NPDES Permit #OHQ000002 and ORC 6111.04 and 6111.07. This violation was noted for the following operations:
 - At the Streets Garage, failure to provide sufficient sediment controls before discharging storm water into the Chagrin River. Straw bales have been placed to settle sediment, but they are not an acceptable primary sediment control. We recommend the Village install a more permanent storm water quality pond. Disturbed areas within 50 feet of the stream should be stabilized and remain permanently vegetated.
 - At the Streets Garage, salt is stored within a dome, but mixing and loading occur outside the shelter. There was evidence of salt residual on the ground outside the dome. Clearlane, a deicing agent, is tarped, but stockpiled outside. This area drains directly to the Chagrin River. The City should consider building a covered loading area and shelter under which to store Clearlane. Adopt good housekeeping practices to clean up salt spills at the time they occur.
 - Failure to install sediment controls and initiate temporary stabilization of soil stockpiles at the Evergreen Cemetery. These measures are required to control erosion. Temporary stabilization is to be initiated within 7 days of last disturbance (within 2 days if within 50 feet of a stream) on bare areas that will remain idle for 14 days or longer.
 - Personnel at the Police/Fire Department facility have not received training on storm water pollution prevention practices. Although a condition of No Exposure currently exists at this facility, it is important to train personnel how to maintain that condition. The Village should consider including this staff when conducting annual employee training required under Part III.B.6.e of the NPDES permit.
 - Some vehicle washing and equipment cleaning at the WWTP occurs outdoors. All vehicle washing and equipment cleaning is to occur indoors where the floor drains connect to sanitary sewer or in an area that will drain back to the headworks of the treatment plant. The NPDES permit for storm water that you must obtain for this facility will not authorize the discharge of vehicle and equipment washwater or washwater generated by tank cleaning operations.
 - Failure to properly label used oil at the WWTP. Containers of used oil must be labeled "Used Oil" per OAC 3745-279. The used oil drums in the storage locker outside the Filter Building were not labeled.

Controls must be implemented immediately. We discussed the installation of silt fence or a sediment trap as temporary control measures until a more permanent solution can be developed. Please review the comments within the attached *Facility Field Inspection Worksheets* regarding these operations.

- **Failure to inspect commercial construction sites for compliance with the approved Storm Water Pollution Prevention Plan (SWP3).** This is a violation of Part III.B.4.c of the NPDES permit and ORC 6111.04 and 6111.07. Although this audit focused on MCM #6, the Village was questioned about its construction site runoff control program (MCM #4) and indicated that they do not inspect commercial development. Please be aware that the NPDES permit requires the

Village to implement a program to ensure the implementation of sediment and erosion control and other pollution prevention practices at all construction activities where the larger common plan of development or sale disturbs 1 or more acre. With a few exceptions such as oil and gas exploration, agriculture or silvicultural tree clearing, construction activity that must be regulated includes any clearing, grading, grubbing, filling or excavating. These requirements pertain to new development as well as redevelopment. Required elements of the program include: review of the SWP3, an initial site inspection and monthly follow-up inspections (unless otherwise justified in the Storm Water Management Program), and enforcement action as allowed by Chapter 1355 of the municipal code to ensure compliance with the approved SWP3.

- **Failure to implement a program to ensure long-term operation and maintenance of privately-owned post-construction storm water BMPs installed since April 21, 2003.** This is a violation of Part III.B.5.d of the NPDES permit and ORC 6111.04 and 6111.07. Although the Village has enacted a local ordinance that establishes the authority to access private post-construction BMPs and order maintenance action, there is no evidence that the Village has implemented a program to enforce the ordinance. Chapter 1357.13 of the municipal code indicates that the Village will inspect storm water practices periodically and issue written notifications to property owners if maintenance is needed. However, the Village has not conducted any such inspections of privately-owned BMPs and has not sent out any such written notifications to property owners. The term “periodically” must be defined within the Storm Water Management Program (SWMP). Please amend the SWMP to provide a measurable timeframe for long-term maintenance inspections of post-construction BMPs.

Deficiencies

- Please be sure to update the inventory of municipal operations in your Storm Water Management Program (SWMP) plan and within your Annual Report. We noted that the SWMP and Annual Report do not acknowledge the Chagrin Falls WWTP or Evergreen Cemetery Maintenance Facility as municipal operations.
- Although the Village did report most of the maintenance activities conducted by municipal operations for the 2012 reporting year, the Annual Report did not include the quantity of street sweepings collected. Please note that this information is to be submitted in the Annual Report required by Part IV.C of the NPDES permit. Please ensure that you are quantifying the amount of material collected through street sweeping and tracking where it is disposed. Street sweepings are a municipal solid waste and must be disposed accordingly. Other reporting items that can be improved include salt usage and catch basin cleanings. The amount of street sweepings should be tracked separately from the amount of catch basin cleanings. All amounts are required to be reported on a January 1st to December 31st calendar basis.
- The Streets Superintendent and Utilities Foreman are responsible for ensuring the implementation of storm water best management practices at the Streets Garage and Wastewater Treatment Plant (WWTP), respectively, but a storm water contact has not been designated for other facilities. In particular, storm water contacts should be designated for the Police/Fire Department and Evergreen Cemetery Maintenance Facility.
- Although the Village has developed checklists to inspect the Service Garage and Police/Fire Department, no inspection checklists have been developed for the Evergreen Cemetery Maintenance Facility or WWTP. We strongly recommend the creation of storm water inspection checklists for these facilities to standardize inspections and remind inspectors of the critical

areas that must be reviewed during an inspection. If action is taken to eliminate exposure at the Evergreen Cemetery, the inspection should be conducted periodically to ensure a condition of no exposure remains. For the WWTP, the checklist should be an appendix within the SWP3 and should be used to conduct Routine Facility Inspections a minimum of once per quarter and a more Comprehensive Site Inspection once per year.

- The SWP3 for the Service Garage does not address all industrial activities that occur at this facility. The SWP3 must be modified to include BMPs for leaf collection and storage. Also, the site map in the SWP3 must be updated. It does not show the location of structural storm water BMPs or the location of the fueling station.
- Sludge loading at the WWTP is exposed to storm water. Although sludge is dropped via an overhead hopper into truck beds, there are times when sludge will spill onto the ground. Good housekeeping practices are needed to immediately sweep up spilled sludge. The WWTP may want to consider constructing an overhang or other such shelter so that the hopper and truck bed are not exposed during this process.
- The Village has developed an inventory of private post-construction BMPs installed since April 21, 2003, but has not yet mapped them. Please be aware that this is required by Part III.B.3.b of the MS4 permit and must be completed by June 3, 2014. Be sure that you establish a process to add new post-construction BMPs to that inventory as new development and redevelopment occur. The MS4 map must be updated annually.

Please review my comments and provide me with a letter of response indicating the actions you will take to address my concerns. **Your response should be received no later than August 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

cc: Rob Jamieson, Superintendent of Streets, Village of Chagrin Falls
Mark Davis, Utilities Foreman, Village of Chagrin Falls
ec: Dan Bogoevski, Ohio EPA, DSW, NEDO
Erm Gomes, Ohio EPA, DSW, NEDO

FIELD INSPECTION WORKSHEET
MS4 SWMP Evaluation
Chagrin Falls Service Dept. Garage

Permittee: Village of Chagrin Falls	
Address of facility: 240 Solon Rd.	Size of facility: 5-6 acres
Date of visit: June 3, 2013	Time of visit: 1:30 pm
Provide the name(s) and title(s) of permittee staff present during inspection	
Name	Title
<i>John Brockway</i>	<i>Streets Dept. Foreman</i>
<i>Rob Jamieson</i>	<i>Streets Dept. Superintendent</i>
<i>Mark Davis</i>	<i>Utilities Dept. Foreman</i>
Evaluator Observations:	
SWPPP or stormwater plan	
Has the maintenance facility developed a SWP3 or stormwater plan?	YES
Does the plan include a site map, list of pollutant sources, BMPs, and maintenance procedures?	YES, but map needs to be updated. (see Notes)
Does the permittee conduct and document periodic inspections of the facility?	Once per year and informally after a rain event. Ohio EPA recommends that routine facility inspections be conducted at least once per quarter.
Are storm drains labeled and free of debris?	Drains are not labeled, but were free of debris.
Vehicle maintenance, fueling and washing	
Are vehicle maintenance activities conducted in a designated place not exposed to stormwater?	YES. Performed indoors where drains pass through an oil/water separator before connecting to the sanitary sewer system. The Village redirected the floor drains to sanitary in 2008.
Are fueling stations properly designed with spill kits nearby?	YES. The diesel fuel tank located outside is not in containment, but is double-walled and equipped with an automatic shut-off valve. We recommend a larger, more obvious sign to identify the emergency shut-off valve. Secondary containment is preferred for purposes of storm water pollution control.
Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer?	YES. Vehicles are washed indoors in which the drains are connected to sanitary sewers.
Material storage	
Are all materials that are potential stormwater contaminants stored under cover or in secondary containment?	Pesticides and fertilizers are stored indoors. Pesticides are stored in a locker with a containment trap. Rock salt is stored inside salt dome, but Clearlane (deicing additive) is stored outdoors. The stockpile is tarped, but Ohio EPA recommends that all deicing chemicals be stored, mixed and loaded under storm-resistant shelters. Recommendations for deicer storage and deicer application can be found at www.saltinstitute.org .
Hazardous waste management	
Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff?	YES
Waste management	
Are waste bins covered with waste properly disposed in containers?	YES. The dumpsters are tarped.

<p>How is landscape waste stored?</p>	<p>Minimal landscape waste is stored on the ground along the Chagrin River. In the fall, piles of leaves are stored in this area.</p> <p>Please be aware that prolonged storage of landscape waste can cause the formation of leachate. The MS4 permit does not authorize the discharge of leachate. Leachates must be managed as wastewater. Earthen berms should be established around leaf storage areas to contain leachates.</p>
<p>Spill response</p>	
<p>Does the facility have a spill response plan, and are spill kits readily available?</p>	<p>YES. A spill kit is located by the used oil and diesel fuel tank. A drum of Oil-Dri is located inside as well.</p>
<p>Employee training</p>	
<p>What type of stormwater training do maintenance staff receive?</p>	<p>Annual training. Last year, a formal staff training event was held. Streets Department employees reviewed the location of their spill kits a week before this audit.</p>
<p>Notes or additional information:</p> <p><u>SWP3 Map</u> The SWP3 site map must be updated to show existing structural control measures and fueling stations exposed to precipitation.</p> <p><u>Erodible Materials</u> Various stockpiles that contain erodible materials are without storm water controls. These stockpiles should be covered with a tarp or a silt fence should be installed around them, keeping the erodible materials from entering the storm water runoff.</p> <p>The yard along the Chagrin River is mostly bare soil. The soil must be seeded and mulched in order to stabilize the soil, reduce erosion, prevent sediment pollution and reduce runoff by promoting infiltration. Temporary seeding should be applied on exposed soil where additional work (grading, etc.) is not scheduled for more than 14 days. Permanent seeding should be applied if the area will be idle for more than one year.</p> <p><u>Sediment Trap</u> A small swale is located on the west side of the property. It channels most of the storm water runoff from the property. The swale contains straw bales as a control measure and empties into the Chagrin River to the west. This control is not acceptable to filter storm water runoff. We recommend a sediment trap or more permanent storm water quality pond be constructed to settle pollutants out of runoff before they discharge to the Chagrin.</p> <p>Specifications and detailed requirements for sediment trap and water quality pond construction can be found in the Ohio Department of Natural Resources' Rainwater and Land Development Manual in section 6.2 and 2.6 respectively. A PDF of the manual can be found at http://www.dnr.state.oh.us/tabid/9186/default.aspx. A copy of section 6.2 and 2.6 have been provided with this letter.</p> <p>It was noted during the inspection that the Village plans to construct a type of berm along the river that will divert storm water to the southwest and into the discussed sediment trap or water quality pond, before discharging into the Chagrin River. Please provide permanent stabilization to the soil once final grade is met.</p> <p><u>Diesel Fuel Tank</u> The diesel fuel tank is located outside the overhang of the main garage. The tank is not in containment, but is double-walled. Small, incidental spills from fueling were evident on the ground around the tank. Please keep the staff educated on the correct procedure if a spill was to occur. The fuel nozzle is equipped with an auto shut-off valve, but still may drip. Provide a catch pan under the nozzle rest to catch any drips. A spill kit is located just inside the overhang. The emergency shut-off valve is located on the wall adjacent to the tank. Please provide a sign to clearly identify the shut-off valve in case of emergency.</p>	

INSPECTION PHOTOS
Service Dept. Garage
Village of Chagrin Falls
Photos Taken: June 3, 2013



Fig. 1: This photo shows the storage locker for the pesticides, herbicides and fertilizers. This locker is locked with a lock and key.

Fig. 2: This photo shows a stockpile of sand next to the Clearlane stockpile. Tarp over or install silt fence around stockpiles of erodible material.



Fig. 3: This photo shows a stockpile of blocks mixed with excavations from a waterline project. Tarp over or install silt fence around stockpiles of erodible material.

Fig. 4: This photo shows two old tractors that belong to the Police Department. The tractors must be scrapped or removed from the property. The tractors have a tendency to leak oils which would add to storm water pollutants.



Fig. 5: This photo shows a small swale that directs storm water directly into the Chagrin River. Straw bales have been placed as a barrier. A more effective BMP must be constructed to minimize storm water pollution.

Fig. 6: This photo also shows the small swale with straw bale barrier. This photo was taken from the downstream side of the straw bales.



Fig. 7: This photo shows a stockpile of debris stored along the Chagrin River. The stockpile contains yard waste, scrap concrete, and other miscellaneous materials. It was noted that this stockpile will be transferred to the Solon CAD Landfill.

Fig. 8: This photo shows wood debris piled along the Chagrin River side of the yard.



Fig. 9: This photo shows the used oil tank, which is clearly labeled, under cover and within secondary containment. A spill kit is nearby.

Fig. 10: This photo shows the diesel fuel tank not in containment, but double-walled.

Municipal Storm Water Program Evaluation MS4 Maintenance Component Worksheet

Date of Evaluation Monday, June 3, 2013
Evaluator Name, Title Dan Bogoevski, DSW, NEDO
MS4 Permittee Village of Chagrin Falls 3GQ00108*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
Ben Himes Village Administrator	Village of Chagrin Falls	(440) 247-5051 ben@chagrin-falls.org
Rob Jamieson, Superintendent John Brockway, Foreman	Streets Department Village of Chagrin Falls	(440) 247-5053 rjamieson@chagrin-falls.org John@chagrin-falls.org
Mark Davis Foreman	Utilities Department Village of Chagrin Falls	(440) 247-5051 utilities-lab@chagrin-falls.org
Harry Edwards Inspector	Building & Zoning Village of Chagrin Falls	(440) 247-5050 Harry@chagrin-falls.org

MS4 Mapping			
Interview Questions	Response		
Outfalls and receiving waters mapped? Catch basins? Pipes, ditches, other conduits?	YES NO The Village has mapped pipes and ditches, but not on one map with outfalls. Has an inventory, but not shown on a map.		
Public stormwater facilities (BMPs)? Private stormwater facilities (BMPs)?	NO		
How are maps used (i.e. tracking illicit discharges)?	Maps have been used to research catch basins and pipe flow to determine if sewers are being maintained. Maps are used during the Village's annual catch basin cleaning program to track cleanings.		
Applicable Documents		Reviewed	Obtained
Map(s) of MS4 system		YES	YES

Notes
<p>MS4 Mapping To meet the mapping obligations of NPDES Permit #OHQ000002, i.e., the MS4 permit in effect from 2009-2014, the map must show <i>catch basins</i> and <i>publicly-owned storm sewers, ditches, conduits</i> and storm water management facilities (including <i>publicly-owned post-construction BMPs and underground detention</i>). In addition, the map must show <i>privately-owned storm water management facilities</i></p>

Notes

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., June 3, 2014.

Illicit Discharge Investigation & Elimination

Please be aware that the NPDES permit #OHQ000002 requires the Village 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 *where any dry-weather flows are detected*. 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 Village 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.

Catch Basin Cleaning

Interview Question	Response
Schedule established for inspections and cleaning?	YES Catch basins are inspected and cleaned once every 3 years. For known problem areas (clogging) the catch basin will be cleaned more frequently. Catch basins were last cleaned in 2009. The Village will be cleaning all catch basins this year (2013). All catch basins are inspected and cleaned in the same year.
Is cleaning and maintenance of catch basins tracked:	YES Could not find map from 2009, but this year the Village will do a street by street log of which catch basins are being done. A storm sewer work sheet is a running log of work done on your MS4 (including catch basins). Street Department Work Orders also capture MS4 maintenance calls. Copies of invoices from contractors that do MS4 maintenance is also kept on file. Maintenance records were available for catch basins with hydrodynamic separators installed (Stormceptor units).
How are spoils materials disposed of?	Taken to WWTP and put onto former sludge drying beds. Once they decant, spoils are placed in dumpster and taken to Waste Management landfill. This includes Stormceptor cleaning done by contractor.
Are storm drain pipes inspected? Proactive or only in response to blockage event?	YES Not proactively, but inspected when a complaint is received. More is done when planning street projects or waterline

	replacements (N and S Franklin St).	
Applicable Documents	Reviewed	Obtained
List of active municipal construction projects <i>There were no active municipal construction projects at the time of inspection, but a waterline line project along Solon Road is expected yet this year.</i> NOTE: Permit is only required if project disturbs 1 or more acre (5 or more acres for "routine maintenance")	YES	NO

Notes			
List of Construction Sites Still Active in Chagrin Falls			
3GC02002*AG	Chagrin Meadows (Bramley Court)	Miles Rd on Hillside	10.8 ac
3GC04297*AG	Falls Walk	E. Summit & North St	12.5 ac
3GC04354*AG	Spillway (Darden)	Mill St	3.3 ac
Not started yet – plan to start summer 2013			
Construction Site Runoff Control Program			
A review of the Ohio EPA Notice of Termination (NOT) list shows only one additional site in the past 10 years: CS Harris Field (school project).			
<p>The Village stated that the Chagrin Meadows and Falls Walk sites are inspected at least once a month for compliance with the approved Storm Water Pollution Prevention Plan (SWP3). However, the Village does not inspect commercial development for erosion and sediment control and the Village Engineer may not have reviewed the SWP3 for the CS Harris Field or Spillway (Darden) projects. During the audit, we discussed program requirements and expectations for the construction site runoff control program. As a reminder, all sites requiring an NPDES permit to discharge storm water associated with construction activities are subject to the local plan review and site inspection requirements of the NPDES permit for small MS4s. This means that the Village must establish a program to review the SWP3 for these sites and conduct a site inspection at least once per month and take enforcement action to ensure compliance with the plan <i>as long as the site is active</i>. NPDES permits are required for all construction activities where the larger common plan of development or sale disturbs 1 or more acre, regardless of whether the construction is municipal, residential or commercial in nature. The Village should reference the Ohio EPA NPDES Permit list to determine which sites are considered active by Ohio EPA. The list is available online at http://www.epa.ohio.gov/dsw/permits/gplist.aspx.</p> <p>For municipal construction projects not subject to NPDES permitting, the Village is to ensure a pollution prevention and good housekeeping program is implemented on those projects to minimize or eliminate the discharge of pollutants to the MS4. Projects in this category may include road repaving where only the topcoat is milled and replaced, ditch cleaning to restore the original line and grade where less than 5 acres is disturbed, or projects that result in an earth disturbance of less than 1 acre, e.g., a waterline repair.</p>			

Stormwater Management Facilities Operation and Maintenance	
Interview Questions	Response
Public facilities inspected?	YES
Frequency:	Stormceptors and Filterra filters are inspected annually. Detention basin, culverts and trash racks are inspected 2 to 3 times per year.
Private facilities inspected?	NO

Stormwater Management Facilities Operation and Maintenance			
Interview Questions	Response		
Frequency:	The Village does not inspect these facilities for long-term maintenance.		
Checklist used for inspections?	NO The Village has not developed one yet. We recommend using the Center for Watershed Protection manual found at www.cwp.org .		
Have maintenance standards and procedures been established for these facilities?	YES Codified ordinance #1357.08-d-10		
How is maintenance prioritized? Is data evaluated to target maintenance resources?	City has never had to prioritize because they have had the funds to follow the set maintenance schedule. The Stormceptors and Filterra filters were monitored to determine an appropriate maintenance schedule.		
Applicable Documents		Reviewed	Obtained
Inspection checklist		NO – Does not exist	NO

Notes
<p><u>Long-Term Maintenance Program for Post-Construction BMPs</u></p> <p>Although the Village does appear to be implementing a long-term maintenance program for publicly-owned post-construction BMPs, the same cannot be said for privately-owned post-construction BMPs installed since April 21, 2003. The Village was aware that post-construction BMPs have been installed at the following privately-owned facilities:</p> <ol style="list-style-type: none"> 1) Senlac Hills (built before 2003) 2) Falls Walk 3) Bramley Court 4) C S Harris Field (High School) <p>but, they did not have an inventory of the practices implemented on these sites. They do not inspect privately-owned stormwater management facilities other than Senlac Hills, which was noted to be publicly-maintained per agreement.</p> <p>As stipulated in Chapter 1357.08(d)(10) of the municipal code, the Village requires an inspection and maintenance agreement for post-construction BMPs. Part III.B.5.d of the NPDES permit requires the Village to implement a program to ensure the agreement is enforced. There is no evidence that the Village has been enforcing the agreements as stipulated in Chapter 1357.13. The Village has not inspected privately-owned post-construction BMPs or issued any written notifications to property owners or home owners' associations regarding long-term maintenance needs. The Village must enact a program to ensure long-term operation and maintenance of privately-owned post-construction BMPs installed since April 21, 2003. Please ensure that your inspectors receive training to identify long-term maintenance needs.</p>

Road Maintenance	
Interview Questions	Response
Streets regularly swept?	YES
Frequency:	The entire Village is swept monthly in Spring, Summer and Fall (not Winter). Downtown

Road Maintenance	
Interview Questions	Response
	<p>business district streets are swept weekly.</p> <p>The Village uses a contractor to conduct street sweeping. The contractor provides the Village with a report quantifying the sweepings each time it is conducted, but the Village does not summarize this data. The Village did not report the amount of street sweepings on the Annual Report for 2012. This information must be submitted.</p>
Frequency based on water quality factors (e.g. proximity to streams)?	NO
	<p>The frequency of street sweeping has been in place since before storm water regulations. Downtown is a destination tourist area, the Village wants that area looking clean.</p>
How are spoils disposed of?	<p>Generally, street sweepings are not dumped in a decanting area because they are dry when collected. If needed, they would be taken to the WWTP when the sweepings are wet. If not wet, they will go directly to a specifically-marked dumpster at the Street Department Garage (240 Solon Rd.) and taken to the Waste Management landfill.</p>
Does the community collect road kill?	YES
<p>What do they do with the carcasses?</p> <p>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.</p>	<p>Placed in dumpster at the Streets Department Garage. Goes into general waste dumpster. Deer may be given to residents.</p>
Does the community have a leaf collection program?	YES
<p>What do they do with the collected leaves?</p> <p>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.</p>	<p>There is a yard waste transfer area at the Service Department Garage, but needs improvement. The Village dumps there and has a contractor come in to take to a compost facility in Geauga County (Green Vision TRC Newbury). Material is not supposed to stay at the Service Department Garage for more than a week. The Village has a plan to make changes on the yard. This is one of the areas that Village plans to improve. They will put a hard surface with conveyance to a storm water BMP (filtration unit). It has not yet been approved to move forward on improvements. No time frame has been established yet.</p>
BMPs used during road maintenance activities?	YES

Road Maintenance	
Interview Questions	Response
Describe types of road maintenance conducted by community staff and the BMPs used	If Village is doing re-ditching, they will put straw bales across the ditch-line. Ditches are reseeded immediately upon the completion of construction activities. Sweep up grit and remove immediately when doing asphalt repair. The Village hasn't really done in-place concrete replacement, so saw-cutting hasn't been an issue, but would use straw bales or other filter when being performed.
BMP guidance available to field staff?	YES Village does some training, but there is no guidance available to field staff out in the field. Before mobilizing on a project, the Village will discuss storm water BMPs. Streets Superintendent does field verification (inspections) to ensure that BMPs are being implemented.
Deicers used by MS4?	YES
Type and amount of deicer and additives tracked? What measures are being taken to minimize the application of deicers?	YES NaCl and Clearlane mix. Stopped using liquid CaCl ₂ after the 2011-12 season due to environmental impacts. The application station was too close to the Chagrin River. Clearlane provides similar effects and is more environmentally-friendly. Normally, the Village uses 1500 to 2000 tons of salt annually, but due to mild winter in Jan-Mar 2012, the number for the 2012 Annual Report is lower than typical. The amount used is tracked via an event log. Each driver fills out a sheet that records how much salt was applied. The total reported is a summary of this data.
Sand/salt swept up after application? How soon?	YES Immediately. Spills only occur at the loading area. Overspill is pushed back into the salt shed. Driver is responsible to do that. Trucks have speed sensors and hoppers that don't result in spills.
Does your community operate a snow stockpile yard to store snow that has been removed from community streets and parking lots? If YES, location of the yards:	YES River Run Park on Solon Rd (one property south of Service Department Garage). Not used with every storm, just 2 or 3 times per season. Done by both City and contractor.
Has your community considered implementing best management practices to control the discharge of pollutants from snowmelt associated with snow storage yards?	YES Snow is dumped in parking lot of park. There is

Road Maintenance		
Interview Questions	Response	
If YES, what BMPs have you implemented?	a grassy area downslope of the parking area. The grass offers a buffer to remove solids. After snowmelt, the paved parking lot is swept up.	
Applicable Documents	Reviewed	Obtained
BMP guidance	YES	Ohio EPA provided – see OCAPP website
Street sweeping records	YES	YES
Deicer application records	YES	YES

Notes
Streets Superintendent has guidance material available in his office that he has received from Ohio EPA training on P2GH.
<p><u>Street Sweeping</u> Street sweeping records are based on the amount disposed of at the landfill. Waste Management reports the tonnage disposed of. Riley Sweeping, the company contracted to sweep streets, does not report the quantity swept, but the hours of sweeping. The Village doesn't have an efficient way to determine how much (tonnage) Riley Sweeping has swept.</p> <p><u>Deicer Usage</u> More accurately tracking road salt usage is one BMP that can help reduce the use of deicers. By tracking this information more closely, you may spot abnormalities in salt usage that can indicate when equipment maintenance is needed, when staff may not be following salt application guidelines and when inventory loss occurs. Other practices that can reduce the use of road salt include regular calibration of salt spreaders and developing a deicer application policy that identifies the level of service to be provided, where "bare pavement" is desired, how quickly streets are to be cleared, what percentage of streets are to get priority and in what areas snow may be hauled away. Priority can be assigned based on the number of vehicles per day, traffic patterns, accident records, school zones, and commercial and industrial areas. Ohio EPA urges you to adopt the sensible salting policies recommended by the Cuyahoga County Engineer or the Salt Institute. A wealth of information is available at www.saltinsitute.org on how to reduce pollution from road deicing activities.</p> <p><u>Summary</u> The Ohio EPA recommends that the Village of Chagrin Falls put together a comprehensive summary that track the amount of street sweepings and catch basin cleanings, as well as amount of deicer used on an annual basis. Currently, there are just individual reports for each event, but no overall summary.</p>

Flood Management		
Interview Questions	Response	
Inventory of flood management structures completed?	YES	
Structures been assessed for stormwater retrofit?	NO	
New structures include water quality considerations?	YES Would consider, but Village has not had a flood control project in years.	
Applicable Documents	Reviewed	Obtained
Inventory	YES	YES

Notes

Inventory of Publicly-Owned Flood Management Structures

There is only one publicly-maintained and operated flood management structure. This structure is an off-line detention basin located on Senlac Hills Drive. The basin has not been considered for retrofit opportunities. The City should investigate whether the basin can be retrofitted to capture the first flush and provide extended detention of the Water Quality Volume (WQv).

Storm Water Retrofit

All aspects of the City's public stormwater management infrastructure should be looked at for possible retrofit opportunities to improve the quality and reduce the quantity of storm water runoff. Ohio EPA is aware that a number of tree box filters were installed within the core downtown area a number of years ago. In addition, the Village recently obtained a Surface Water Improvement Fund (SWIF) grant from Ohio EPA to install a bioretention area within the Solon Road ditch before it discharges into a tributary of the Chagrin River. The Village would also like to apply for a bioswale to filter runoff from the Street Department Yard before it flows into the Chagrin River. These are all good examples of a storm water retrofit.

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 imposed by Ohio EPA 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 the Village of Chagrin Falls is largely built-out, this limits the opportunities to implement post-construction BMPs as part of the development/redevelopment process. As such, US EPA is evaluating whether retrofits should be required in future generations of the MS4 permit.

For this reason, 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.** The Village appears to be on board with adopting green infrastructure strategies where feasible.

Facilities Operation & Maintenance

Interview Questions	Response												
Inventory of MS4 facilities complete (i.e. facilities owned and operated by the MS4)?	NO												
<p><u>Types of facilities included</u> <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>WWTP and Evergreen Cemetery Maintenance Building (S Franklin St.) must be added to inventory list.</p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center; border-bottom: 1px solid black;">Response</th> <th style="text-align: center; border-bottom: 1px solid black;"><u>SWP3 Developed?</u></th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">NO</td> <td>N/A, since do not operate</td> </tr> <tr> <td style="text-align: center;">NO</td> <td>N/A, since do not operate</td> </tr> <tr> <td style="text-align: center;">NO</td> <td>N/A, since do not operate</td> </tr> <tr> <td style="text-align: center;">NO</td> <td>N/A, since do not operate</td> </tr> <tr> <td style="text-align: center;">YES</td> <td>Submitted NOE, however</td> </tr> </tbody> </table>	Response	<u>SWP3 Developed?</u>	NO	N/A, since do not operate	YES	Submitted NOE, however						
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Facilities Operation & Maintenance			
Interview Questions	Response		
<p>301 Meadow Lane Chagrin Falls, OH 44022</p> <p><i>These do not need their own permit, but do have to develop an SWP3 unless noted as N/A:</i></p> <ul style="list-style-type: none"> • Impound Lots • Leaf Collection Yards <ul style="list-style-type: none"> ✓ No discharge of leafate permitted Is part of operations at Service Garage, 240 Solon Road • Maintenance/Service Yards <ul style="list-style-type: none"> ➤ How many do they operate? 2 ➤ List facility names/locations: 240 Solon Road Chagrin Falls, OH 44022 40 Cleveland Street Chagrin Falls, OH 44022 • Composting Operations <ul style="list-style-type: none"> ✓ No discharge of leachate permitted • Solid Waste Transfer Stations or Operations <ul style="list-style-type: none"> ✓ Under landfill permit if community owns the transfer station and the landfill where waste will be taken ✓ If not, then SWP3 is only needed if vehicle maintenance, equipment washing or fueling activities occur at the transfer station, or if a portion of the facility is involved with recycling or composting • Parks & Cemeteries <ul style="list-style-type: none"> ➤ How many in UA? 7 ➤ List facility names/locations: 2 cemeteries and 5 parks Evergreen Cemetery Maintenance Facility 506 S. Franklin St. Chagrin Falls, OH 44022 • Parking Lots <ul style="list-style-type: none"> ➤ How many do they operate? 3 ➤ List facility name/locations: W. Washington St Lot 	<p>facility does not qualify for this exemption</p>	<p>Response</p> <p>NO</p> <p>YES</p> <p>YES</p> <p>NO</p> <p>NO</p> <p>YES</p> <p>YES</p>	<p>SWP3 Developed?</p> <p>N/A, since do not operate</p> <p>Add to SWP3 For Service Garage</p> <p>YES</p> <p>Utilized for storage of records, off-season equipment and small power equipment. No maintenance or equipment cleaning occurs here, therefore this facility is not subject to SWP3 requirement.</p> <p>N/A, since do not operate</p> <p>N/A, since do not operate</p> <p>N/A</p> <p>Small scale equipment maintenance is performed inside the building at the Evergreen Cemetery Maintenance Facility. Equipment washing is done at the Street Department Garage located at 240 Solon Rd.</p> <p>N/A</p>

Facilities Operation & Maintenance	
Interview Questions	Response
<p style="text-align: center;">Plaza Parking Lot E. Orange St aka Riverside Lot</p> <ul style="list-style-type: none"> • Bus Terminals • Vehicle Maintenance Garages <ul style="list-style-type: none"> ➤ How many do they operate? 1 ➤ List facility name/locations: <p style="text-align: center;">Police and Fire Department 21 W. Washington St. Chagrin Falls, OH 44022</p>	<p style="text-align: center;">NO N/A, since do not operate YES No Exposure</p> <p>All vehicle maintenance occurs indoors where floor drains are connected to sanitary. As such all areas where vehicle maintenance or equipment cleaning occurs are protected by a storm-resistant shelter. However, the Village has developed an SWP3 for the facility and conducts inspections anyways. See Facility Inspection Worksheet.</p>
<p>Facilities inspected?</p> <p>Frequency:</p>	<p style="text-align: center;">YES</p> <p>Formally, facilities are inspected annually. Informally, they look for erosion after rain events. Paved surfaces are swept when there is an accumulation of grit or gravel. During leaf season, that area is checked to ensure leaves do not get pushed into the Chagrin River. Village has not inspected the Service Garage at 240 Solon Rd this year.</p>
<p>Checklist used?</p>	<p style="text-align: center;">AT SOME FACILITIES, BUT NOT ALL</p> <p>Checklist used for 240 Solon Rd (Streets Garage) and 21 W. Washington St (Police and Fire Department), but not other facilities.</p>
<p>Staff which perform the inspections (department or agency):</p>	<p>Mark Davis, Foreman of Utilities Dept.</p> <p>He has attended a P2GH workshop from Ohio EPA and uses the checklist within the SWP3. But, additional storm water training is suggested. Mr. Davis has indicated that the WWTP qualifies for the No Exposure exemption from industrial storm water permitting, but it does not. See Facility Inspection Worksheet.</p>
<p>Is there a designated stormwater contact person for each facility?</p> <p>NOTE: Go through list above where YES is response and write in answers for each activity. Name is SWP3 should match name given. If not, SWP3 must be updated.</p>	<p style="text-align: center;">AT SOME FACILITIES, BUT NOT ALL</p> <p>Rob Jamieson, Streets Superintendent, is responsible to ensure SWP3 implementation at 240 Solon Rd.</p> <p>Mark Davis, Utilities Foreman, is designated contact for 301 Meadow Lane (WWTP),</p> <p>There is no designated contact for the Police and Fire Department and Evergreen Cemetery Maintenance Facility.</p>

Facilities Operation & Maintenance			
Interview Questions	Response		
Describe enforcement procedures used to address noncompliance on a MS4-owned facility, i.e., what disciplinary measures are taken against those that do not implement standard operating procedures?:	Department head would tell employee to take corrective action. He then determines if it is a matter of lack of training or just not following procedure. A recent situation occurred where an employee was caught washing a vehicle outside. The Streets Superintendent instructed him to stop and relocate operations indoors in a designated wash station.		
Parking lots owned/operated by the permittee swept?	YES		
Frequency?	Weekly throughout the summer months. Spring and Fall as weather allows.		
Do you operate any asphalt parking lots?	YES		
Do you use any coal tar-based sealants on those asphalt parking lots?	NO		
	Use crack filler, no sealant used.		
Do you have any combined sewer systems?	NO		
If yes, do you have any combined sewer overflows?	N/A		
➤ How many? _____			
➤ Do you track frequency and volume?			
Are you aware of any illicit cross connections between your sanitary sewer and MS4?	NO		
If yes, what is your plan to eliminate this illicit discharge?			
Have you investigated the extent of infiltration and inflow into storm sewer system?	NO		
What methods have been used to conduct this investigation?			
What are your plans to repair and eliminate this source of illicit discharge?			
Sewer spill and cleanup procedures in place?	NO		
	The Village has no known sanitary sewer overflows and is unaware of any in the past.		
Applicable Documents		Reviewed	Obtained
Facility inventory		Does not exist	NO

Facilities Operation & Maintenance			
Interview Questions		Response	
Facility SWPPP		YES	YES

Notes
<p><u>Wastewater Treatment Plant</u></p> <p>After inspecting the Village of Chagrin Falls WWTP, the facility does not qualify for No Exposure Certification. The facility must obtain storm water NPDES permit coverage. Please contact Erm Gomes at the Ohio EPA Northeast District Office in order to modify your existing NPDES permit to include Parts IV, V, and VI which pertain to storm water requirements. You can contact Erm at (330) 963-1196 or via e-mail at erm.gomes@epa.state.oh.us. You may also elect to obtain general NPDES permit coverage under the Ohio EPA General NPDES Permit for Storm Water Associated with Industrial Activities #OHR000004. If you choose to obtain general permit coverage, submit a Notice of Intent (NOI) for Industrial Storm Water, See Facility Inspection Worksheet for Village of Chagrin Falls WWTP for more information.</p> <p>In either case, the facility must develop an SWP3. A guidance document for developing an SWP3 is available on the Ohio EPA website at http://www.epa.ohio.gov/dsw/permits/GP_IndustrialStormWater.aspx. To ensure implementation of the SWPPP, the NPDES permit will require you to conduct Routine Facility Inspections at least once per quarter, a Quarterly Visual Assessment of storm water discharges, and a Comprehensive Site Inspection and Annual Report once per year. Recordkeeping and reporting templates are available at this same website.</p> <p><u>Storm Water Pollution Prevention Plans</u></p> <p>A Storm Water Pollution Prevention Plan (SWP3) must be developed and implemented for the following facilities:</p> <p style="padding-left: 40px;">Village of Chagrin Falls Wastewater Treatment Plant (WWTP) 301 Meadow Lane Chagrin Falls, OH 44022</p> <p style="padding-left: 40px;">Service Garage 240 Solon Rd Chagrin Falls, OH 44022</p> <p>A condition of No Exposure exists at the following facilities:</p> <p style="padding-left: 40px;">Village of Chagrin Falls Police/Fire Department 21 W. Washington St. Chagrin Falls, OH 44022</p> <p>SWP3s have been developed for the Service Garage and the Police/Fire Department. For the Chagrin Falls WWTP, if you elect to modify your existing NPDES permit, the SWP3 must be developed within 6 months of the effective date of the modification and implemented within 12 months of that date. If you elect to obtain general NPDES permit coverage, the SWP3 must be developed before you submit the NOI and must be implemented within 180 days.</p> <p><u>Evergreen Cemetery Maintenance Facility</u></p> <p>Small-scale equipment maintenance occurs at this facility, but the Village indicates that no vehicle maintenance or equipment cleaning occur. The Village has not developed an SWP3 for this facility. Please be aware that vehicle maintenance includes vehicle rehabilitation, mechanical repairs, painting, fueling and lubrication. If vehicle maintenance and equipment cleaning occur at this facility, you must develop an SWP3.</p> <p>In reviewing the operations here, equipment maintenance occurs inside the building. We noted that</p>

Notes
<p>exposure only exists because of a floor drain inside the building with direct discharge to the environment. As such, exposure can be eliminated by permanently capping the floor drain and ensuring that any maintenance activities occur inside. We recommend the Village take this action to eliminate exposure.</p> <p>The nature of operations at the cemetery are such that soil stockpiles will exist on an on-going basis. Soils that will remain bare and idle for 14 days or longer should be temporarily stabilized with seed and/or mulch within 7 days of when they are stockpiled. Soils that will be used within 14 days of stockpiling should be placed upslope of silt fence or other such perimeter sediment control.</p>

Pesticides, Herbicides & Fertilizers			
Interview Questions	Response		
Certified applicators used?	YES		
	John Brockway is the licensed applicator.		
Integrated Pest Management (IPM) practices used?	NO		
Storage location of pesticides, herbicides, and fertilizers:	At Service Department Garage at 240 Solon Rd within a cabinet. Chemicals are stored in a locked storage cabinet. Sprayer is on a special rack.		
BMPs used during application:	Ensure the education of the applicator and those that apply under his license. Post signs in areas where it has been applied. Hand pump sprayers are all that is used. Does not apply prior to rain event and during high winds. Applies amount as recommended by manufacturer.		
Fertilizer/pesticide application plan utilized?	YES		
Applicable Documents		Reviewed	Obtained
Fertilizer/pesticide application plan		YES	YES

Notes
<p><u>Application Plan</u> 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 pesticides and herbicides. When using a contractor to apply pesticides and herbicides, 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> <p><u>BMPs for Pesticide, Herbicide and Fertilizer Application</u> 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>

Notes

Integrated Pest Management (IPM) is an effective and environmentally sensitive approach to pest management that relies on a combination of common-sense practices. IPM programs use current, comprehensive information on the life cycles of pests and their interaction with the environment. This information, in combination with available pest control methods, is used to manage pest damage by the most economical means, and with the least possible hazard to people, property, and the environment. For further information, please refer to <http://www.epa.gov/pesticides/factsheets/ipm.htm>.

NPDES Permits for Pesticide Application

On October 31, 2012, Ohio EPA issued a general NPDES permit for the discharge of biological pesticides and those chemical pesticides that leave a residue (NPDES permit #OHG870001). MS4s that apply such pesticides in, over or near waterways, e.g., as part of golf course or green space management, are subject to the requirements of this NPDES permit. Most situations are covered by rule meaning submittal of an NOI (permit application) is typically not required. However, an NOI is required if pesticides are applied:

- Directly to public water supply reservoirs
- To very high quality waters (outstanding national resource waters, outstanding state waters or superior high quality waters other than Lake Erie)
- To waters to control non-native fish populations
- To more than 80 acres of wetlands per year
- To forests, or applied aerially to Lake Erie

The best way for MS4s to avoid a permit violation is to leave a buffer around surface waters (lakes, ponds, wetlands, rivers, streams and ditches that connect to surface waters or ground water) when applying pesticides. Ohio EPA has not set technical criteria for the term “near water” because doing so would not limit an applicator’s liability under the federal Clean Water Act. If you must apply pesticides to surface waters, e.g., mosquito control, it must occur in compliance with the NPDES permit. If the treatment area exceeds certain thresholds, there are additional documentation and reporting requirements. Those thresholds are:

- 6400 acres for mosquito/insect control
- 80 acres for wetland and lake application
- 20 linear miles for stream/ditch bank application or intrusive vegetation control

Communities with populations less than 10,000 are not required to implement Integrated Pest Management (IPM) and do not have to prepare a Pesticide Discharge Management Plan, even if thresholds are exceeded. However, they must still submit the annual report required by NPDES permit #OHG870001 to Ohio EPA.

All applications of pesticides and herbicides “in, over or near” surface waters are covered, including small-scale uses. A fact sheet on the new permit can be found on the Ohio EPA website at http://www.epa.ohio.gov/portals/35/permits/Pesticide_Final_FS_oct11.pdf. If you need more information about this program, please contact Eric Nygaard in our Central Office at (614) 644-2024.

Standards, BMPs, & Outreach

Interview Questions	Response
BMP technical guidance document available to maintenance staff?	YES Have materials provided by Ohio EPA during

Standards, BMPs, & Outreach			
Interview Questions	Response		
	P2GH workshops as well as materials used to train staff.		
MS4 use contractual staff to complete MS4 maintenance activities?	YES		
BMP guidance materials provided to contracted staff?	YES Has discussed operations with leaf collection, fertilizer applicator and street sweeping contractors each season. Intends to make this an on-going annual discussion.		
Requirement to consider stormwater impacts and utilize appropriate BMPs in contracts?	N/A Formal contract only if \$50,000 or more.. All contracts have been under \$50,000, so no formal contracts needed.		
Materials used to educate the public regarding stormwater impacts on MS4 property (if applicable, i.e. public spaces):	<p><u>Pet Waste</u> Brochures provide by Chagrin River Watershed Partners at public events held in the village. Also on City website. Doggie bag dispensers are dog walking park and other parks.</p> <p><u>Litter Reduction</u> Street Department or Utilities Department monitors the trash in cans. They collect when mowing. They vacuum the downtown sidewalks daily during summer season, and two to three times per week at other times of the year. Recycling is encouraged by placing containers at Founders Field and are put out during public events, but these are not drop-off areas. These are just recycle containers for pop cans, etc.</p>		
Applicable Documents		Reviewed	Obtained
BMP manual or guidance document		YES	YES
Contract language for MS4 operation and maintenance activities		N/A	N/A

Notes
<p><u>Technical Guidance and Specifications for Maintenance Staff</u> Ohio EPA suggests the following improvements to disseminate technical guidance on storm water pollution prevention matters to the Service 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 http://www.dnr.state.oh.us/tabid/9186/Default.aspx and the <i>Municipal Pollution Prevention/Good Housekeeping Manual #9</i> (Center for Watershed Protection, September 2008). This manual is available as a free download on the US EPA website at http://cfpub.epa.gov/npdes/stormwater/munic.cfm.</p>

Staff Education and Training

Interview Questions	Response		
<p>Staff trained to identify potential storm water pollution sources which would result in an illicit discharge?</p> <p>Frequency:</p>	<p>YES</p> <p>Class in 2012 during a staff meeting. Discussed what to look for when doing catch basin cleaning and ditch cleaning, as well as at Service Yard.</p>		
<p>Materials used to train staff:</p>	<p>Training materials from Ohio EPA P2GH was shared with staff. No sign-in sheet, but did have a write-up listing employees trained.</p>		
Applicable Documents		Reviewed	Obtained
<p>Training materials</p>		<p>YES</p>	<p>YES</p>

Notes
<p><u>MS4 Staff Training</u></p> <p>The first generation of the MS4 permit required the City to develop an employee training program to prevent and reduce storm water pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances and storm water system maintenance.</p> <p><i>Please note that NPDES permit #OHQ000002 requires the City to conduct at least one employee training event on these topics per year. If key management staff attends a storm water education event, it is expected that the information learned will be shared with the appropriate staff so that they can conduct their job duties without causing storm water pollution. The City should also look to incorporate training on storm water pollution prevention in any new employee training program that may exist if that employee's job duties have the potential to create storm water pollution or include illicit discharge identification and elimination.</i></p> <p>For training that the City organizes for its staff, please retain: (1) the agenda for the training session, including the date that training was provided and names/organizations of the speakers, (2) an attendance list with the signatures of attendees and (3) one copy of the materials used for training. For outside training attended, include an agenda (if available) or a list of topics, the names of attendees, date attended and a copy of any attendance certificate issued by the training organization.</p> <p>Ohio EPA also has a library of training videos on storm water pollution prevention practices for municipal operations, spill response and hazardous waste management. These videos can be checked out of our lending library for FREE by contacting Dan Bogoevski at the Ohio EPA Northeast District Office (NEDO) at (330) 963-1145. Some of these videos are also available through ODOT's Local Technical Assistance Program (LTAP).</p> <p>US EPA has 2 to 3 webcasts per minimum control measure that can be viewed at any time over the internet at www.epa.gov/npdes/training. These can be shown at staff meetings or as part of a training event as well.</p>

FIELD INSPECTION WORKSHEET
MS4 SWMP Evaluation
Chagrin Falls Fire/Police Department & Village Hall

Permittee: Village of Chagrin Falls	
Address of facility: 21 W. Washington St.	Size of facility: 1 - 2 acres
Date of visit: June 3, 2013	Time of visit: 3:20 pm
Provide the name(s) and title(s) of permittee staff present during inspection	
Name	Title
<i>John Catani</i>	<i>Fire Lieutenant</i>
<i>Mark Davis</i>	<i>Utilities Dept. Foreman</i>
<i>Rob Jamieson</i>	<i>Streets Dept. Superintendent</i>
Evaluator Observations:	
SWPPP or stormwater plan	
Has the maintenance facility developed a SWP3 or stormwater plan?	NO, but a condition of No Exposure exists where vehicle maintenance and equipment cleaning occur. Ohio EPA recommends that the Village provide written guidance to facility personnel on practices required to maintain a condition of No Exposure.
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?	YES. Mark Davis performs annual inspections on this facility. Inspections should ensure that a condition of No Exposure remains. If inspection reveals that vehicle maintenance (including vehicle rehabilitation, mechanical repairs, painting, fueling and lubrication) or equipment cleaning occur in areas exposed to storm water, an SWPPP will need to be developed and implemented for this facility.
Are storm drains labeled and free of debris?	Some trash is spilled near a storm drain by the Police Department Garage. Ensure good housekeeping practices around trash dumpsters by keeping the area clean of trash and debris.
Vehicle maintenance, fueling and washing	
Are vehicle maintenance activities conducted in a designated place not exposed to stormwater?	YES. Fire Dept. maintenance is performed inside, where the drains connect to sanitary. The Police Dept. contract a private company for maintenance off-site.
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?	YES. Fire Dept. vehicles are washed indoors where the drains are connected to sanitary. Police Dept. washes their vehicles off-site, at a commercial car wash.
Material storage	
Are all materials that are potential stormwater contaminants stored under cover or in secondary containment?	N/A

Hazardous waste management	
Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff?	N/A. No hazardous materials are stored on-site. All oil changes are done off-site.
Waste management	
Are waste bins covered and waste properly disposed in containers?	YES, but some good housekeeping required at Police Dept.
How is landscape waste stored?	N/A
Spill response	
Does the facility have a spill response plan, and are spill kits readily available?	Yes, at the Fire Department.
Employee training	
What type of stormwater training do maintenance staff receive?	None to date. Please include the Fire and Police Department staff in your training to ensure they understand how to maintain a condition of No Exposure.
Notes or additional information:	
<u>Oil/water Separator</u> An oil/water separator is located outside the Fire Department and connects to the sanitary sewer on Walnut St. Please be aware that when the oil/water separator is cleaned out, there is potential that pollutants will be exposed to storm water if a spill were to occur. Adopt spill clean-up procedures in case of an emergency.	

FIELD INSPECTION WORKSHEET
MS4 SWMP Evaluation
Chagrin Falls Evergreen Cemetery Maintenance Facility Field Inspection Worksheet

Permittee: Village of Chagrin Falls	
Address of facility: 506 S. Franklin St.	Size of facility:
Date of visit: June 3, 2013	Time of visit: 3:45 pm
Provide the name(s) and title(s) of permittee staff present during inspection	
Name	Title
<i>Mark Davis</i>	<i>Utilities Dept. Foreman</i>
<i>Rob Jamieson</i>	<i>Streets Dept. Superintendent</i>
<p>Floor Drain A floor drain inside the building is connected to storm sewer system. This drain must be capped to ensure no pollutants are exposed to storm water. There are some lawnmowers and other materials stored inside the building. Small scale maintenance fluids are stored inside also.</p> <p>Excavations Stockpile A soil stockpile is located on the property. This stockpile consists of loose soil that is likely to erode when it rains. This stockpile must be seeded and mulched if the soil is expected to remain at this location longer than 14 days. We recommend a silt fence be installed lining the west side of the stockpile area.</p>	

INSPECTION PHOTOS
Evergreen Cemetery Maintenance Facility
Village of Chagrin Falls
Photos Taken: June 3, 2013



Fig. 1: This photo shows the floor drain inside the building which is connected to the storm sewer system.

Fig. 2: This photo shows the soil stockpile in the background, to the left. A lot of the yard is bare dirt and not seeded. This area must be seeded and mulched to prevent the runoff of sediment.

FIELD INSPECTION WORKSHEET
MS4 SWMP Evaluation
Chagrin Falls WWTP

Permittee: Village of Chagrin Falls	
Address of facility: 301 Meadow Lane	Size of facility: 10 acres
Date of visit: June 3, 2013	Time of visit: 2:30 pm
Provide the name(s) and title(s) of permittee staff present during inspection	
Name	Title
<i>Mark Davis</i>	<i>Utilities Dept. Foreman</i>
<i>Rob Jamieson</i>	<i>Streets Dept. Superintendent</i>
Evaluator Observations:	
SWPPP or stormwater plan	
Has the maintenance facility developed a SWP3 or stormwater plan?	NO. This facility was covered under a No Exposure Certification, 3GRN0738*BG. Our inspection revealed that this facility does not qualify for the No Exposure exemption from industrial storm water permitting. As such, this facility is in violation of ORC 6111.04 and OAC 3745-39-04 for discharging storm water without authorization under an NPDES permit (see Notes).
Does the plan include a site map, list of pollutant sources, BMPs, and maintenance procedures?	NO. You must develop a site map in compliance with the NPDES permit you must obtain.
Does the permittee conduct and document periodic inspections of the facility?	NO
Are storm drains labeled and free of debris?	NO. There is evidence of lawnmower and shovel washing in the storm drain. All equipment cleaning is to occur in an area served by sanitary sewer or where it will drain back to the headworks of the treatment plant.
Vehicle maintenance, fueling and washing	
Are vehicle maintenance activities conducted in a designated place not exposed to stormwater?	YES. Performed indoors where drains are connected to sanitary.
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?	YES. Vehicles are washed indoors where the drains are connected to sanitary, but some vehicles are washed outside where the drains are connected to storm. All vehicle washing is to occur in an area served by sanitary sewer or where washwater will drain back to the headworks of the treatment plant.
Material storage	
Are all materials that are potential stormwater contaminants stored under cover or in secondary containment?	NO. A stock pile of sand was not covered. It was noted that the stock pile is normally covered, but the sand was being used that day. The pile will be tarped at the end of the day.
Hazardous waste management	
Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff?	NO. The materials are not labeled (see Notes).
Waste management	
Are waste bins covered with waste properly disposed in containers?	YES, but the grit container is not covered. (see Notes)

How is landscape waste stored?	N/A
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 for WWTP staff will be required under the NPDES permit you must obtain.

Notes or additional information:

No Exposure

After our assessment, this facility does not qualify for no exposure certification. As noted below and as shown in the attached photos, there are many instances where pollutants are exposed to storm water. In addition, connection ports for bulk chemical unloading are not within containment. The facility must obtain storm water NPDES permit coverage. Please contact Erm Gomes at the Ohio EPA Northeast District Office in order to modify your existing NPDES permit to include Parts IV, V, and VI which pertain to storm water requirements. You can contact Erm at (330) 963-1196 or via e-mail at erm.gomes@epa.state.oh.us.

Grit Container

The grit container, located at the headworks of the plant, is uncovered. A drain, underneath the container, drains back into the WWTP. Please note that just having that drain does not expose pollutants to storm water. However, when the dumpster is emptied, pollutants have the potential to spill onto the pavement where it slopes away from the sanitary drain and become a storm water pollutant. Please be aware of the potential exposure and implement good housekeeping practices to reduce exposure. A well-labeled spill kit is needed in this area.

Polyaluminum Chloride Fill Port

The fill port for the polyaluminum chloride tank is exposed to storm water. A storm drain is in close proximity to the fill port. There is potential for storm water pollution when the tank is being filled with the polyaluminum chloride. Place a drip pan under the fill port when filling the tank to catch any drips and minor spills. Make sure there is a spill kit nearby and clearly labeled if a spill was to occur. The staff should be trained to know exactly where spill kits are in case of emergencies and on spill clean-up procedures.

Vehicle Washing

There is evidence of vehicle washing on the pavement outside the Filter Building/Maintenance Shop. A storm drain is in that area. Vehicles must be washed in an area which drains to sanitary sewers or the headworks of the plant. When a vehicle is washed or hosed off, there are oils and residuals on the vehicle that are getting washed down the drain.

Oil Drums

A few oil drums, in the Maintenance Shop, are uncapped. The drums are not labeled. The drums must be clearly labeled, showing what exactly is in the container. If the drum contains used oil, it must be labeled "Used Oil", not waste oil. The drains inside the building are connected to sanitary, but the drums are in close proximity to the garage door where outside drains are connected to storm. The drums require secondary containment in case of a spill. Implement good housekeeping practices to keep the area clean. A clearly labeled spill kit is needed in this area.

A storage shed, outside the Filter Building, contains used oil drums. Significant staining is present outside and inside the shed. Absorbent pads have been placed on the floor of the shed to soak up any spills, but this practice is not effective. There must be secondary containment provided for these drums. The WWTP should consider purchasing a storage locker with built-in secondary containment. Also, the drums are not labeled. The drums must be labeled "Used Oil".

Sludge Loading

The sludge loading area is another point of exposure to storm water. Sludge is loaded by a conveyor from inside the building and into the bed of the truck, which is outside. Good housekeeping practices must be

implemented by immediately sweeping up any debris that misses the truck bed and spills onto the ground. We suggest that a roof or overhang be built to cover the conveyor and truck being loaded. This would minimize the exposure to storm water by keeping contaminants under cover.

INSPECTION PHOTOS
WWTP
Village of Chagrin Falls
Photos Taken: June 3, 2013



- Fig. 1:** This photo shows the dumpster near the headworks of the WWTP. The drain below the dumpster connects to the WWTP.
- Fig. 2:** This photo shows the fill port for the polyaluminum chloride tank and a storm drain in close proximity. This fill port is a source of exposure to storm water.



- Fig. 3:** This photo shows the storm drain outside the Filter Building/Maintenance Shop. There is evidence that vehicles have been hosed off in this area.
- Fig. 4:** This photo shows various oil drums in the maintenance shop. These drums are not labeled. The white and blue drums are not sealed. The one in the center of the photo has a valve for filling. The drums should be placed in secondary containment to capture spills.



Fig. 5: This photo shows the left-most oil drum from Figure 4. This drum is not capped and a lot of staining and debris from spills is seen on the floor, around it. Implement good housekeeping practices, keeping the area clean and free of pollutants.



Fig. 6: This photo shows a storage locker outside the Filter Building that contains used oil drums. Significant leaking and staining is seen on the ground and inside the locker. No secondary containment is provided. The oil drums are not labeled.



Fig. 7: This photo shows a sand stockpile in which the sand is not covered.



Fig. 8: This photo shows the sludge loading area. Sludge is loaded from a conveyor into the bed of the truck. Implement good housekeeping practices by immediately sweeping up any debris that misses the truck bed and spills onto the ground.