



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

September 19, 2013

RE: CUYAHOGA COUNTY
CITY OF BEDFORD
MUNICIPAL STORM WATER
MCM #6 INSPECTION
3GQ00045*BG

NOTICE OF VIOLATION

Clint Bellar
Service Director
City of Bedford
165 Center Road
Bedford, OH 44146

Dear Mr. Bellar:

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 September 11, 2013, Ohio EPA met with you to determine compliance with the NPDES permit and the Storm Water Management Plan (SWMP). In performing this audit, Ohio EPA implemented the Municipal Storm Water Program Evaluation Guide developed by the United States Environmental Protection Agency.

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 implement procedures for the proper disposal of waste removed from your MS4.** This is a violation of Part III.B.6.d.iii.3 of the NPDES permit and Ohio Revised Code 6111.04 and 6111.07. Street sweepings and catch basin cleanings are a solid waste and any liquids which are decanted from such materials, as well as storm water which contacts stockpiles of these materials, is leachate, a wastewater which must be managed accordingly. The dumpster containing street sweepings and catch basin cleanings is leaking and leachate is discharging into the City's MS4. The City must implement best management practices (BMPs) to prevent the discharge of this leachate. See comments in the attached worksheets for suggestions and recommendations.

- **Failure to provide controls (BMPs) for reducing or eliminating the discharge of pollutants from municipal facilities.** This is a violation of Part III.B.6.d.iii.2 of the NPDES permit and ORC 6111.04 and 6111.07. This violation was noted for the following operations at your facilities:
 - Failure to keep dumpsters covered to prevent the discharge of wastewater to the City's MS4.
 - Failure to prevent the discharge of vehicle washwater to the City's MS4 at the Service Department.
 - Failure to provide secondary containment for the used oil tank, stored outside at the Service Department, to prevent the discharge of pollutants.
 - Failure to properly label used oil at the Service 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 ensure adequate long-term operation and maintenance (O&M) of public/private stormwater management facilities.** This is a violation of Part III.B.5.d of the Ohio EPA General Storm Water NPDES permit #OHQ000002 and ORC 6111.04 and 6111.07. The City is required to have an inventory of all privately-owned post-construction BMPs installed since April 21, 2003 and all public stormwater management facilities. The City must develop a program to ensure the long-term maintenance of these structures. Ohio EPA recommends that each facility be inspected at least once a year either by the City or the party responsible for long-term maintenance. We recommend the City develop checklists or adopt checklists as your standard for conducting these inspections. This will ensure that all facilities are inspected and that all BMPs are constructed and maintained according to the City's adopted standards. The City must establish standards for these maintenance tasks. Most communities reference standards contained in *Rainwater and Land Development* (ODNR, 2006) or the United States Environmental Protection Agency's Menu of BMPs rather than establish their own.

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

- **Failure to develop and implement a plan to detect and eliminate source(s) of illicit discharge.** This is a violation of Part III.B.3.e of the NPDES permit and ORC 6111.04 and 6111.07. The City failed to attach a list of illicit discharges to their 2012 Annual Report. The Cuyahoga County Board of Health has identified 8 illicit discharges from the City of Bedford. The City has eliminated 3 of those discharges and has found that the 5 others are failing home sewage treatment systems (HSTSs) within the City. The City does not have a plan to eliminate these sources of illicit discharges. Please provide me with your plan to eliminate (action and timeframe to complete) these sources or the steps you have taken to eliminate these sources.
- **Failure to develop an employee training program on how to reduce the discharge of pollutants from municipal operations to the MS4.** This is a violation of Part III.B.6.e of the NPDES permit #OHQ000002 and ORC 6111.04 and 6111.07. The NPDES permit requires your training program to provide at least one training event per year. The City has not held an employee training event since 2006. Thus, the City has not developed an employee training program for storm water pollution prevention as expected under the MS4 program. Training opportunities involving Ohio EPA can be found at www.epa.ohio.gov/ocapp/storm_water.aspx. Training events provided by Ohio EPA and the materials used at those events are archived at this site and can be used by MS4s to train their staff. U.S. EPA has an archive of MS4-related training at www.epa.gov/npdes/training. Be sure to include storm water pollution prevention training in any new employee training program, where appropriate.
- **Failure to submit a Notice of Termination (NOT) for municipal construction projects.** This is a violation of Part IV.A of the Ohio EPA General Storm Water NPDES permit #OHC000003. Our records show that the City of Bedford still has an active permit under the Ohio EPA General Storm Water NPDES Permit for Construction Activities for the *Bedford City Campus Recreation Trail*, permit no. 3GC03323*AG, which the City indicated never began nor will ever start. Please submit an NOT for this project.

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). In addition, the map must show privately-owned storm water management facilities constructed as post-construction BMPs for new development or redevelopment which has occurred since April 21, 2003. Please ensure that a comprehensive map of the MS4 is produced no later than June 4, 2014.
- The City has not developed site maps of their municipal facilities. Each map should indicate the location of potential pollutant sources, the control measures (best management practices) implemented to minimize or eliminate the discharge of pollutants, and the drainage systems and patterns of each facility. Each map should show all catch basins, storm sewers and points of discharge for storm water from the facility and delineate drainage areas to each outfall.

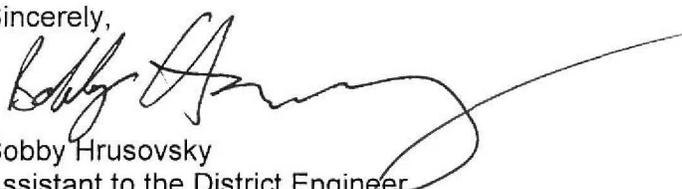
CLINT BELLAR
SEPTEMBER 19, 2013
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- The City has not conducted routine inspections for any of their municipal facilities. Inspections are required to be performed on a routine basis as specified in each facility's SWP3. The Ohio EPA recommends that facilities be inspected monthly. A comprehensive site evaluation must also be conducted at least once per year. We strongly recommend the use of storm water inspection checklists for these facilities to standardize inspections and remind inspectors of the critical areas that must be reviewed during an inspection. Checklists are included in the SWP3s for each facility.
- The City has not developed contract language to require storm water BMP implementation when a third-party provides municipal operations on behalf of the City. Contract language must be added to all contracts with such parties, e.g., operators that provide car impoundment, herbicide/ pesticide application and mulching services, as well as road maintenance activities and emergency repairs. Further, we recommend periodic inspection of their operations to assure that they are implementing BMPs.

Please review my comments and provide me with a letter of response indicating the actions you will take to address my concerns. **Your response should be received no later than October 18, 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 Dan Bogoevski at (330) 963-1145 or via e-mail at dan.bogoevski@epa.ohio.gov.

Sincerely,



Bobby Hrusovsky
Assistant to the District Engineer
Division of Surface Water

BH:bo

pc: Shawn Francis, Superintendent of Public Works, City of Bedford
Stephen Schreiber, P.E., City of Bedford Engineer, GPD Group

Municipal Storm Water Program Evaluation MS4 Maintenance Component Worksheet

Date of Evaluation	September 11, 2013
Evaluator Name, Title	Bobby Hrusovsky, DSW, NEDO
MS4 Permittee	City of Bedford, #3GQ00045*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
Clint Bellar	Service Director	(440) 735-6581 cbellar@bedfordoh.gov
Shawn Francis	Superintendent of Public Works	(440) 735-6582 sfrancis@bedfordoh.gov
Stephen Schreiber	City Engineer, GPD Group	(216) 927-8671 sschreiber@gpdgroup.com

MS4 Mapping		
Interview Questions	Response	
Outfalls and receiving waters mapped?	YES	
Catch basins?	YES	
Pipes, ditches, other conduits?	YES	
Public stormwater facilities (BMPs)?	NO	
Private stormwater facilities (BMPs)?	NO	
How are maps used (i.e. tracking illicit discharges)?	Track illicit discharges found by CCBH and investigate.	
Applicable Documents	Reviewed	Obtained
Map(s) of MS4 system	YES	YES

Notes
<p>MS4 Mapping</p> <p>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 <i>storm water management facilities (including publicly-owned post-construction BMPs and underground detention)</i>. 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., June 4, 2014.</p>

Catch Basin Cleaning

Interview Question	Response		
Schedule established for inspections and cleaning?	YES The City's plan is to clean all catch basins within a five year time period.		
Is cleaning and maintenance of catch basins tracked:	YES Cleaning and maintenance is tracked by the name of the street done.		
How are spoils materials disposed of?	Spoils are dumped in a three-walled concrete storage barrier, at 100 Solon Rd lower yard, where the cleanings dewater. The dry cleanings are disposed of in a dumpster next to the barrier. KIMBLE waste services removes the dumpster when needed.		
Are storm drain pipes inspected? Proactive or only in response to blockage event?	YES Pipes are inspected when the City performs catch basin cleaning. If there is a blockage, the pipe will be jetted out to the next catch basin to be cleaned. The storm sewer pipes were televised about ten years ago. The City wishes to conduct this again in the near future.		
Applicable Documents		Reviewed	Obtained
List of active municipal construction projects		YES	YES
List of municipal projects covered under the Ohio EPA general storm water NPDES permit for construction activities NOTE: Permit is only required if project disturbs 1 or more acre (5 or more acres for "routine maintenance")			

Notes
<p>Municipal Construction Projects</p> <p>One municipal construction projects still have an active permit according to the Ohio EPA's database: Bedford City Campus Recreation Trail (3GC03323*AG). The City noted that this construction project has never started nor will it ever begin. If the project is no longer viable, please submit a Notice of Termination (NOT) for this project to close out NPDES permit coverage. The NOT and instructions can be obtained on the Ohio EPA Storm Water Program webpage at www.epa.ohio.gov/dsw/storm/stormform.aspx. As a reminder, coverage under the Ohio EPA General Storm Water NPDES Permit for Construction Activities is to be terminated within 45 days of when a project reaches final stabilization. Please be sure to incorporate this requirement into your procedures on all future projects.</p>

Stormwater Management Facilities Operation and Maintenance	
Interview Questions	Response
Public facilities inspected? Frequency:	YES There is no set frequency for inspections. The City's staff performs visual assessments on an as needed basis.
Private facilities inspected? Frequency:	YES Like the public stormwater management facilities, there is no set frequency and visual assessments are on an as needed basis.

Stormwater Management Facilities Operation and Maintenance			
Interview Questions		Response	
Checklist used for inspections?		NO	
Have maintenance standards and procedures been established for these facilities?		The members interviewed were not sure. It is believed that the Building Department would have those standards and procedures.	
How is maintenance prioritized? Is data evaluated to target maintenance resources?		Maintenance is not prioritized.	
Applicable Documents		Reviewed	Obtained
Inspection checklist		NO	NO

Notes
<p><u>Inspections of Stormwater Management Facilities</u></p> <p>The City is required to ensure long-term maintenance of stormwater management facilities. Ohio EPA requires that this program include privately-owned facilities constructed since April 21, 2003, and all publicly-owned stormwater management facilities. Storm water management facilities include best management practices (BMPs) designed to treat the Water Quality Volume (WQv), otherwise improve the quality of runoff or reduce the volume of runoff generated. BMPs include structures such as bioretention cells, permeable pavements, green roofs, enhanced water quality swales, sand filters, extended detention ponds, constructed wetlands and proprietary devices (including underground structures). Your post-construction BMP program must include the following components:</p> <ol style="list-style-type: none"> 1. Plan review to assure that post-construction storm water quality BMPs are being provided, are designed per required standards and have a long-term maintenance plan 2. Tracking the location of post-construction BMPs and the party responsible for implementing the long-term maintenance plan 3. Performing an inspection to assure that post-construction BMPs are installed per the approved plan. 4. Periodically inspecting or otherwise verifying that the post-construction BMP is being maintained in accordance with the long-term maintenance plan. <i>A checklist is recommended to perform inspections and should be reflective of the operation and maintenance standards established by the Village.</i> 5. Taking enforcement action against the responsible party if they fail to maintain the BMP as required. <p>The City has not yet developed the robust long-term maintenance program for post-construction BMPs, which is a violation under Part III.B.5 of the NPDES permit #OHQ000002. Information on developing an effective long-term maintenance program for post-construction BMPs can be found from the Center for Watershed Protection at http://www.cwp.org/2013-04-05-16-15-03/stormwater-management.</p> <p>As a reminder, Ohio EPA has required a long-term maintenance plan for all post-construction BMPs since April 21, 2003. Although it must be a stand-alone document, it is part and parcel of the Storm Water Pollution Prevention Plan (SWP3) required by the Ohio EPA General Storm Water NPDES Permit for Construction Activities. The goal of the MS4 program is to develop a local review and approval program for the SWP3. <i>This includes post-construction BMPs and their long-term maintenance plans.</i> These plans are required to provide a schedule for routine and non-routine maintenance tasks to be undertaken. Please ensure that long-term maintenance plans are being submitted as part of the SWP3 review and approval process.</p>

Road Maintenance	
Interview Questions	Response
Streets regularly swept?	YES

Road Maintenance	
Interview Questions	Response
Frequency:	The streets are swept on a weekly basis during the spring. They are swept on a monthly basis during the summer.
Frequency based on water quality factors (e.g. proximity to streams)?	YES
How are spoils disposed of?	The spoils are dumped in the three-walled concrete storage barrier with catch basin cleanings where it dewater. The Sweepings are then placed in the dumpster with catch basin cleanings to be taken by KIMBLE waste services.
Does the community collect road kill? What do they do with the carcasses? NOTE: MS4s are not obligated to collect road kill, but if they do, can be disposed in dumpsters or taken to a licensed, Class II composting facility. Cannot have pile of carcasses stacked up. This is open dumping.	YES The carcasses are bagged, frozen, then disposed in the general waste dumpster which is taken by KIMBLE waste services.
Does the community have a leaf collection program? What do they do with the collected leaves? NOTE: Landfills have been banned from accepting yard waste, so MS4 cannot place leaves and yard waste in dumpster. Must be composted at a licensed Class IV composting facility. Communities may temporarily store leaves awaiting transport to a composting facility but leafate must be prevented from discharging.	YES The City used to operate a compost facility (the City still has the composting license for the facility). The City stopped composting last year. Leaves are taken to MRLM and JTO Inc. on 600 Solon Road along with wood chips and other yard waste.
BMPs used during road maintenance activities? Describe types of road maintenance conducted by community staff and the BMPs used	YES The City conducts mainly spot repairs and grading. Implementing inlet protection and silt fence is done as needed.
BMP guidance available to field staff?	YES Storm Water Pollution Prevention Best Management Practices Guidebook
Deicers used by MS4?	YES
Type and amount of deicer and additives tracked? What measures are being taken to minimize the application of deicers?	Road Salt. The City only tracks the amount purchased, not used. The City has established a sensible salting program which outlines that main and secondary roads, school zones, hills,

Road Maintenance			
Interview Questions		Response	
		intersections, curves and bridges will be salted. The hydraulic controls in the salt trucks are locked down so the drivers cannot control how much is put out, the City has control.	
Sand/salt swept up after application? How soon?		<p style="text-align: center;">YES</p> <p>As soon as possible if there is a spill on the road.</p>	
Does your community operate a snow stockpile yard to store snow that has been removed from community streets and parking lots? If YES, location of the yards: Has your community considered implementing best management practices to control the discharge of pollutants from snowmelt associated with snow storage yards? If YES, what BMPs have you implemented?		<p style="text-align: center;">YES</p> <p>Snow stockpiles are stored at the City swimming pool parking lot.</p> <p style="text-align: center;">NO</p> <p>The parking lot is swept when the snow melts.</p>	
Applicable Documents		Reviewed	Obtained
BMP guidance		YES	YES
Street sweeping records		YES	YES
Deicer application records		YES	YES

Notes
<p>Street Sweeping and Catch Basin Cleaning Disposal</p> <p>There is staining on the pavement tracking from the street sweepings and catch basin cleanings dumpster into a nearby storm drain. This is evidence of an illegal discharge of leachate into the City's MS4. This is a violation of Part III.B.6.d.iii.3 of the NPDES permit #OHQ000002. See the Facility Inspection Worksheet for the Service Department for more information. The City of Bedford dewateres the street sweepings and catch basin cleanings in a three-walled concrete barrier. The dewatered leachate ponds within the barrier to evaporate out. During a heavy enough rain event, that leachate has the potential to flow out of the barrier and into the storm drain nearby. Procedures must be developed and implemented to avoid this overflow. Also, it was discussed during the inspection that the City can possibly move the street sweepings and catch basin cleanings to dewater at the City of Bedford Wastewater Treatment Plant. See the Facility Inspection Worksheet for the Wastewater Treatment Plant for more information on this issue.</p> <p>Deicer Usage</p> <p>Tracking the amount of deicers used is one BMP that can help reduce the amount applied. By tracking this information more closely, you may spot abnormalities in salt usage that can indicate when equipment maintenance is needed, when staff may not be following salt application guidelines and when inventory loss occurs.</p> <p>Please be aware that the Annual Report requires information to be reported on a January-to-December calendar year basis. This may require you to adjust how you summarize salt usage data, as most</p>

Notes
communities have typically been tracking usage on a winter season basis. Please keep in mind that the City is required to track salt usage as well as the use of additives, i.e., brine, beet juice.

Flood Management			
Interview Questions		Response	
Inventory of flood management structures completed?		NONE	
Structures been assessed for stormwater retrofit?		N/A	
New structures include water quality considerations?		N/A	
Applicable Documents		Reviewed	Obtained
Inventory		N/A	N/A

Facilities Operation & Maintenance																									
Interview Questions		Response																							
Inventory of MS4 facilities complete (i.e. facilities owned and operated by the MS4)?		YES																							
<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 style="text-align: center;">Bedford WWTP - 3PD00005*HD</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 • Maintenance Yards <ul style="list-style-type: none"> ➤ How many do they operate? <u> 1 </u> ➤ List facility names/locations: <p style="margin-left: 40px;">Service Department 100 & 120 Solon Rd.</p> • Composting Operations <ul style="list-style-type: none"> ✓ No discharge of leachate permitted 		<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;">SWP3 Developed?</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">NO</td> <td style="text-align: center;">N/A, since do not operate</td> </tr> <tr> <td style="text-align: center;">NO</td> <td style="text-align: center;">N/A, since do not operate</td> </tr> <tr> <td style="text-align: center;">NO</td> <td style="text-align: center;">N/A, since do not operate</td> </tr> <tr> <td style="text-align: center;">NO</td> <td style="text-align: center;">N/A, since do not operate</td> </tr> <tr> <td style="text-align: center;">YES</td> <td style="text-align: center;">YES</td> </tr> </tbody> </table> <p>NOTE: 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> <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;">SWP3 Developed?</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">NO</td> <td style="text-align: center;">N/A, since do not operate</td> </tr> <tr> <td style="text-align: center;">NO</td> <td style="text-align: center;">N/A</td> </tr> <tr> <td style="text-align: center;">YES</td> <td style="text-align: center;">YES</td> </tr> <tr> <td style="text-align: center;">NO</td> <td style="text-align: center;">N/A, since do not operate</td> </tr> </tbody> </table> <p>City does have one, but it is not currently in operation. Leaves have been removed from site.</p>		Response	SWP3 Developed?	NO	N/A, since do not operate	YES	YES	Response	SWP3 Developed?	NO	N/A, since do not operate	NO	N/A	YES	YES	NO	N/A, since do not operate						
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Facilities Operation & Maintenance

Interview Questions	Response
<ul style="list-style-type: none"> • Solid Waste Transfer Stations or Operations <ul style="list-style-type: none"> ✓ Under landfill permit if community owns the transfer station and the landfill where waste will be taken ✓ If not, then SWP3 is only needed if vehicle maintenance, equipment washing or fueling activities occur at the transfer station, or if a portion of the facility is involved with recycling or composting 	<p>NO N/A, since do not operate</p>
<ul style="list-style-type: none"> • Parks & Cemeteries <ul style="list-style-type: none"> ➤ How many in UA? <u> 12 </u> ➤ List facility names/locations: <p> Town Square North Park and Broadway Bedford Pool 411 Lamson Ave. Bedford Recreation Center 124 Ellenwood Ave. Hutchinson Field 350 West Grace St. Greencroft Park 74 Greencroft Rd. Taft Park 705 Taft Ave. Viaduct Park Willis St. Interstate Playground 35 Justin St. Palmetto Ave. Tot Lot First St. Tot Lot Talbot Dr. Tot Lot Bedford Cemetery 929 Broadway </p> 	<p>YES N/A</p> <p>11 Parks, 1 Cemetery</p>
<ul style="list-style-type: none"> • Parking Lots <ul style="list-style-type: none"> ➤ How many do they operate? <u> 4 </u> ➤ List facility name/locations: <p> Two on Willis St. Two on Woodrow Ave. </p> 	<p>YES N/A</p>
<ul style="list-style-type: none"> • Bus Terminals • Vehicle Maintenance Garages <ul style="list-style-type: none"> ➤ How many do they operate? ➤ List facility name/locations: <p> Service Department 100 Solon Rd. </p> 	<p>NO N/A, since do not operate</p> <p>YES YES*</p>
	<p>*SWP3 (or, in case of airport and shipping port, NPDES permit for industrial storm water) required only if vehicle maintenance, equipment cleaning or deicing operations occur.</p>

Facilities Operation & Maintenance	
Interview Questions	Response
<p>Facilities inspected?</p> <p>NOTE: Go through list above where YES is response and write in answers for each activity.</p> <p>Frequency:</p> <p>NOTE: Go through list above where YES is response and write in answers for each activity.</p>	<p>YES</p> <p>The facilities are inspected non-formally, on an as needed basis by all employees.</p>
<p>Checklist used?</p> <p>NOTE: Go through list above where YES is response and write in answers for each activity. Checklist should be part of SWP3.</p>	<p>NO</p> <p>Checklists are not used, but they are available in each facility's SWP3.</p>
<p>Staff which perform the inspections (department or agency):</p> <p>NOTE: Go through list above where YES is response and write in answers for each activity. Checklist should document name of inspector.</p>	<p>All employees. The City will start having the superintendents of each facility conduct the inspections.</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 in SWP3 should match name given. If not, SWP3 must be updated.</p>	<p>YES. The superintendents for each facility are the primary contacts.</p>
<p>Describe enforcement procedures used to address noncompliance on a MS4-owner facility, i.e., what disciplinary measures are taken against those that do not implement standard operating procedures?:</p>	<p>The City would use standard disciplinary procedures, starting with a suspension.</p>
<p>Parking lots owned/operated by the permittee swept?</p> <p>Frequency?</p> <p>Do you operate any asphalt parking lots?</p> <p>Do you use any coal tar-based sealants on those asphalt parking lots?</p> <p>NOTE: Some MS4s have banned the use of coal tar-based sealants in their communities. Research from the University of New Hampshire Stormwater Center and by the City of Austin, TX, has shown these</p>	<p>YES</p> <p>Each parking lot is swept when its particular street is swept that day.</p> <p>YES. One parking lot is concrete.</p> <p>NO. The sealant is asphalt based.</p>

Facilities Operation & Maintenance			
Interview Questions	Response		
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.			
Do you have any combined sewer systems?	NO		
If yes, do you have any combined sewer overflows? ➤ How many? _____ ➤ Do you track frequency and volume?	N/A		
Are you aware of any illicit cross connections between your sanitary sewer and MS4?	NO		
If so, what is your plan to eliminate this illicit discharge?			
Have you investigated the extent of infiltration and inflow into storm sewer system?	YES		
What methods have been used to conduct this investigation?	Dye testing.		
What are your plans to repair and eliminate this source of illicit discharge?	The City has eliminated faulty system problems in the MS4. The City plans to work with the CCBH to eliminate the failed HSTs discharging into the MS4.		
Sewer spill and cleanup procedures in place?	YES		
	Applicable Documents	Reviewed	Obtained
	Facility inventory	YES	YES
	Facility SWP3	YES	YES

Notes
<p><u>Municipal Facility Inspections</u> The City has not conducted storm water inspections of their municipal facilities. Facilities must be inspected at a frequency specified in the SWP3. Ohio EPA recommends that facilities be inspected monthly. A comprehensive site evaluation must be conducted at least once per year and a record of that inspection and its findings must be kept with the SWP3. If this annual inspection reveals deficiencies in the SWP3 or BMPs that are ineffective, the SWP3 must be revised to correct the problems.</p> <p><u>Discharging Home Sewage Treatment Systems (HSTs)</u> The City has investigated the illicit discharges identified by the Cuyahoga County Board of Health (CCBH) and 5 have been found to be failing HSTs that are discharging into the City's MS4. Please be aware that the NPDES permit #OHQ000002 requires the City to work with the CCBH to determine which of these systems are not operating as designed and intended. For systems not operating as designed and intended, the City must use its illicit discharge ordinance and the CCBH must use the provisions in Ohio Revised Code 6117.51 to require connection to the sanitary sewer system where it is legal, feasible and economical to do so. ORC 6117.51 requires tie-in to sanitary sewers whenever the foundation of residential buildings and the common sewage collection system are within 200 feet from the nearest boundary of the right-of-way within which the public sewer is located. For systems that</p>

Notes
cannot be eliminated through connection to sanitary sewers or the installation of a soil absorption system, the property owner must be notified to contact Ohio EPA and pursue coverage under an appropriate NPDES permit.
<u>Illicit Discharge Investigation & Elimination</u> Please be aware that the NPDES permit #OHQ000002 requires the City to perform dry weather screening at all outfalls at least once by April 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 III.B.3.g 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 City must take action under the local illicit discharge ordinance to eliminate it. For sources not eliminated by the next Annual Report, the City 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.
Please provide me with a copy of the City's illicit discharge plan for elimination.

Pesticides, Herbicides & Fertilizers			
Interview Questions	Response		
Certified applicators used?	YES The City has contracts with Davey Tree and Tucker Landscaping.		
Integrated Pest Management (IPM) practices used?	N/A		
Storage location of pesticides, herbicides, and fertilizers:	These are not stored at municipal facilities.		
BMPs used during application:	N/A		
Fertilizer/pesticide application plan utilized?	N/A		
Applicable Documents		Reviewed	Obtained
Fertilizer/pesticide application plan		N/A	N/A

Notes
<u>Pesticide, Herbicide and Fertilizer Application</u> The City of Bedford does not apply any pesticides, herbicides, or fertilizers themselves. These applications are contracted out. No chemical storage or application of this nature is done by the City. Please be sure to include language into the contract that requires the contractor to consider pollution controls where the activities undertaken are a potential source of storm water pollution.

Standards, BMPs, & Outreach	
Interview Questions	Response
BMP technical guidance document available to maintenance staff?	YES
MS4 use contractual staff to complete MS4 maintenance activities?	YES , for larger jobs.
BMP guidance materials provided to contracted staff?	YES
Requirement to consider stormwater impacts and	NO

Standards, BMPs, & Outreach			
Interview Questions		Response	
utilize appropriate BMPs in contracts?			
Materials used to educate the public regarding stormwater impacts on MS4 property (if applicable, i.e. public spaces):		Tinkers creek watershed partners do event every year in town square. Public newsletter. Pet waste: no pets allowed in some parks. No dog bags. Litter reduction: no littering signs throughout the city and garbage cans are out there.	
Applicable Documents		Reviewed	Obtained
BMP manual or guidance document		YES	YES
Contract language for MS4 operation and maintenance activities		NO	NO

Notes
<p>Storm Water Contract Language Contracted staff includes those that do road maintenance or fertilizer application, for example. Please be sure to include language requiring pollution controls in all contracts and requests for proposal (RFPs) where the activities are a potential source of storm water pollution. The operations of third party service providers should be reviewed periodically by the City to ensure that the required pollution controls are being implemented.</p>

Staff Education and Training			
Interview Questions		Response	
Staff trained to identify potential storm water pollution sources which would result in an illicit discharge?		NO	
Frequency:		The last employee training event occurred in 2006. The next employee training event is scheduled for October 2013. The City is going to start holding an employee training event every year.	
Materials used to train staff:		Handouts and pamphlets	
Applicable Documents		Reviewed	Obtained
Training materials		YES	NO

Notes
<p>MS4 Staff Training 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. The NPDES permit #OHQ000002 requires the City to conduct at least one employee training event on these topics per year. The City has not conducted an employee training event since 2006. This is a violation of the NPDES permit. 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.</p>

Notes

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.

The following materials may help with developing a training program:

Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) has provided a number of training opportunities on pollution prevention and good housekeeping for municipal operations over the past several years. Materials presented at OCAPP's session are archived on the internet at: http://epa.ohio.gov/ocapp/storm_water.aspx and can be used to provide training to your staff. Future training events involving Ohio EPA are listed on this site as well.

ODOT's Local Technical Assistance Program (LTAP) maintains a library of training videos, including videos on storm water pollution prevention that can be borrowed at no cost. These videos and several others are also available from Ohio EPA at no cost. Please contact Adrienne LaFavre at (330) 963-1250 for further information.

United States Environmental Protection Agency (US EPA) has two to three webcasts per minimum control measure that can be viewed at any time over the internet at www.epa.gov/npdes/training.

The Lake County (OH) Stormwater Management Department has developed a series of Toolbox Talks that can be used during staff meetings to train maintenance staff on a single storm water pollution prevention topic at a time. This tool is intended to provide training by eliciting discussion amongst the staff and can be completed in less than 15 minutes per topic. Please contact Tim Miller, Director of the LCSMD at (440) 350-5900 for further information.

FIELD INSPECTION WORKSHEET
MS4 SWMP Evaluation
Service Department Field Inspection Worksheet

Permittee: City of Bedford	
Address of facility: 100 & 120 Solon Road	Size of facility: 2.5 acres
Date of visit: September 11, 2013	Time of visit: 12:00 PM
Provide the name(s) and title(s) of permittee staff present during inspection	
Name	Title
<i>Shawn Francis</i>	<i>Superintendent of Public Works</i>
Evaluator Observations:	
SWP3 or Storm Water Pollution Prevention Plan	
Has the maintenance facility developed an SWP3 or stormwater plan?	YES
Does the plan include a site map, list of pollutant sources, BMPs, and maintenance procedures?	The plan does not include a site map.
Does the permittee conduct and document periodic inspections of the facility?	NO
Are storm drains labeled and free of debris?	Storm drains are free of debris.
Vehicle maintenance, fueling and washing	
Are vehicle maintenance activities conducted in a designated place not exposed to stormwater?	YES. Vehicle maintenance activities are conducted inside the 100 Solon Rd. garage where the floor drains are connected to sanitary.
Are fueling stations properly designed with spill kits nearby?	NO. There is not spill kit near the fueling station.
Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer?	YES. Vehicles are generally washed inside the 100 Solon Rd. garage, but it was noted that vehicles are occasionally washed outside the 120 Solon Rd. garage. Vehicles must be washed inside where the floor drains connect to sanitary sewers.
Material storage	
Are all materials that are potential stormwater contaminants stored under cover or in secondary containment?	NO. The street sweeping/catch basin cleaning dumpster is not covered. A used oil container located outside next to the fueling station is not provided with secondary containment.
Hazardous waste management	
Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff?	NO. Used oil containers must be labeled as "Used Oil". Some containers are stored outside.
Waste management	
Are waste bins covered with waste properly disposed in containers?	NO. The scrap dumpster is not covered and the lids for the general waste bins are open.
How is landscape waste stored?	
Spill response	
Does the facility have a spill response plan, and are spill kits readily available?	YES
Employee training	
What type of stormwater training do maintenance staff receive?	The last storm water training event occurred in 2006.

Notes or additional information:

Site Map

The City has not developed a site map of this facility for the SWP3. The site map must indicate the location of potential pollutant sources, the control measures (best management practices) implemented to minimize or eliminate the discharge of pollutants, and the drainage systems and patterns. The map should show all catch basins, storm sewers and points of discharge for storm water from this facility and delineate drainage areas to each outfall. Refer to Part 5.1.2 of the Ohio EPA General NPDES Permit for Industrial Activities #OHR000005 for further guidance on developing this site map. This permit can be downloaded from the Ohio EPA website at http://www.epa.ohio.gov/dsw/permits/GP_IndustrialStormWater.aspx.

Inspections

Routine inspections must be conducted for this facility at a frequency specified in the SWP3. The Ohio EPA strongly recommends the use of storm water inspection checklists for the facility to standardize inspections and remind the inspector of the critical areas that must be reviewed during an inspection. Checklists are included in the SWP3 for this facility. Employees should always keep an eye out for spills or leaks from vehicles and equipment stored outside and be trained to react correctly to such a situation. If a vehicle is found to be leaking oil, place a drip pan under the leak and soak up the spilled oil with oil dry. The vehicle must be serviced as soon as possible.

Inspection Findings

All dumpsters must be covered with a lid or tarp to prevent the collection of storm water and the formation of leachates. The general waste dumpsters have lids, but two have been left open (Figure 1). A scrap dumpster, located along the south property line of the 100 Solon Rd. facility, is not covered and contains containers and parts with oils (Figure 2). These dumpsters must be covered.

Street sweepings and catch basin cleanings are dumped in a three-walled concrete barrier to dewater (Figure 3). The pavement inside the barrier is sloped in so no leachate can flow out. The leachate has ponded inside the barrier and the barrier is not leaking. If a heavy enough rain event occurs, the leachate inside the barrier has the potential to overflow and discharge into a nearby storm drain. This would be an illicit discharge into the City's MS4. Procedures must be developed and implemented to prevent this overflow to occur. The ponded leachate could be frequently vacuumed out and hauled to be treated at the wastewater treatment plant. The dewatered street sweepings and catch basin cleanings are disposed of in a dumpster (Figure 4). This dumpster is not covered and is leaking. The dumpster must be replaced with one that will not leak and must be covered with a lid or tarp to prevent the collection of storm water and the formation of more leachate.

There is no evidence of salt tracking from the salt storage barn (Figure 5). There is evidence that storm has hit the salt at the edge of the door. We recommend laying a tarp over the salt at the edge so not to come into contact with storm water.

All containers which are to be used to contain used oil must be labeled as "Used Oil" per Ohio Administrative Code (OAC) 3745-279. A used oil container located inside the maintenance garage must be labeled as "Used Oil" (Figure 6). A container of used oil and drums are located outside the maintenance garage (Figure 7). These containers must be labeled as "Used Oil". Please be aware that any drip pans used to catch used oil or smaller container storing used oil must also be labeled as "Used Oil".

In the process of filling the large used oil container, oil has been spilled off the container and onto the pavement (Figures 7 & 8). The container must be stored on secondary containment to catch any spills from the tank or from filling. A spill kit should be stored near the container and all employees must be trained to correctly react to any spills. The spilled oil must be soaked up with oil dry and swept up as soon as possible.

The vehicle fueling station is located outside the maintenance garage (Figure 9). There is no evidence of spills, but a spill kit should be provided close by in case of minor leaks or spills. The emergency shut-off buttons are located inside the garage door on the opposite side of the wall from the fuel pump. A clearly labeled sign must be installed to identify where the emergency shut-off buttons are in case an employee is not familiar with the building.

An open drum of soap is stored inside the 120 Solon Rd. facility (Figure 10). There are no drains in this building and the

drum is in close proximity to the garage door. Secondary containment must be provided to the drum in case of a spill.

During the inspection, it was noted that some vehicle washing occurs outside. Vehicles cannot be washed outside. They must be washed inside where floor drains connect to the sanitary sewer system. There is staining on the ground from staff washing out paint buckets (Figure 11). This practice must stop immediately. Paint cannot be sprayed onto the ground. The paint could be sprayed into a bin or drum to better contain the paint and reduce the potential for runoff to be contaminated.

INSPECTION PHOTOS
Service Department
Date Taken: September 11, 2012



Fig. 1 (Left): This photo shows the general waste dumpsters and their lids left open.

Fig. 2 (Right): This photo shows the scrap dumpster which is uncovered and containing oily parts and containers.



Fig. 3 (Left): This photo shows the three-walled concrete barrier which is used for street sweeping and catch basin cleaning dewatering. Leachate has pooled in the back of the barrier.

Fig. 4 (Right): This photo shows the street sweeping and catch basin cleaning dumpsters which is uncovered. Brown staining shows evidence that the dumpster is leaking leachate and flowing into the storm drain.



Fig. 5 (Left): This photo shows the salt barn. Storm water has come into contact with the salt nearest to the door.

Fig. 6 (Right): This photo shows the used oil container in the maintenance garage which is not labeled.



Fig. 7 (Left): This photo shows the used oil container holding used oil and other drums containing used oil filters. Oil has spilled on the ground from filling the larger container. These containers must be labeled as "Used Oil".

Fig. 8 (Right): This photo shows the larger used oil container's cap which employees remove to fill the container. The stains are from oil spilling over the tank.

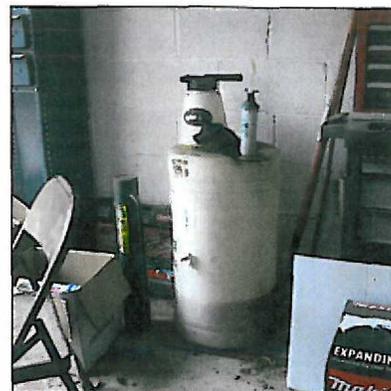


Fig. 9 (Left): This photo shows the vehicle fueling station. A spill kit and sign identifying the location of the emergency shut-off button are needed.

Fig. 10 (Right): This photo shows the drum of soap which requires secondary containment.



Fig. 11 (Left): This photo shows staining on the pavement from employees washing out paint buckets. This practice must stop immediately.

Fig. 12 (Right): This photo shows a snow plow stored outside. We recommend securing a plastic bag around the hydraulic connectors in case of any leaks.

FIELD INSPECTION WORKSHEET
MS4 SWMP Evaluation
Wastewater Treatment Plant Field Inspection Worksheet

Permittee: City of Bedford	
Address of facility: 705 West Glendale	Size of facility: 6 acres
Date of visit: September 11, 2013	Time of visit: 1:15 PM
Provide the name(s) and title(s) of permittee staff present during inspection	
Name	Title
<i>Shawn Francis</i>	<i>Superintendent of Public Works</i>
Evaluator Observations:	
SWP3 or Storm Water Pollution Prevention Plan	
Has the maintenance facility developed an SWP3 or stormwater plan?	YES
Does the plan include a site map, list of pollutant sources, BMPs, and maintenance procedures?	The plan does not include a site map.
Does the permittee conduct and document periodic inspections of the facility?	NO
Are storm drains labeled and free of debris?	Storm drains are free of debris.
Vehicle maintenance, fueling and washing	
Are vehicle maintenance activities conducted in a designated place not exposed to stormwater?	Vehicle maintenance activities are not conducted at this facility, only equipment maintenance.
Are fueling stations properly designed with spill kits nearby?	There are no fueling stations at this facility.
Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer?	Vehicles are washed inside the garage where the floor drains connect to the wastewater treatment plant.
Material storage	
Are all materials that are potential stormwater contaminants stored under cover or in secondary containment?	YES
Hazardous waste management	
Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff?	Hazardous materials are not stored at this facility.
Waste management	
Are waste bins covered with waste properly disposed in containers?	The general waste dumpster has a lid, but it is not covered. The lid must be closed at all times to prevent the collection of storm water and the formation of leachates.
How is landscape waste stored?	Landscape waste is not stored at this facility.
Spill response	
Does the facility have a spill response plan, and are spill kits readily available?	The facility has a spill response plan.
Employee training	
What type of stormwater training do maintenance staff receive?	Staff at this facility has not received training. The employees of this facility must be included in the City's upcoming annual training events.
Notes or additional information:	
SWP3 The City has developed an SWP3 for the wastewater treatment plant. The SWP3 for this facility must meet the requirements of Part IV of the facility's Individual NPDES permit #3PD00005*HD. A site map must be included with the SWP3 indicating an outline of the drainage area of each storm water outfall, each existing structural control measure to	

reduce pollutants in storm water runoff, surface water bodies, locations where significant materials are exposed to precipitation, and other requirements outlined in the permit. Inspections must be conducted by qualified facility personnel and records of inspections must be kept with the SWP3. The permit also requires the SWP3 be signed and certified in accordance with the requirements of 40 CFR 122.22, and be retained on-site at the facility. The facility's Individual NPDES permit can be accessed through the Ohio EPA website at http://wwwapp.epa.ohio.gov/dsw/permits/permit_list.php.

Inspections

Routine inspections must be conducted for this facility at a frequency specified in the SWP3. The Ohio EPA strongly recommends the use of storm water inspection checklists for the facility to standardize inspections and remind the inspector of the critical areas that must be reviewed during an inspection. Checklists are included in the SWP3 for this facility.

Dewatering Bed

The facility has a dewatering bed where screenings are stored to dewater. We discussed during our inspection that the City may want to start dewatering the street sweepings and catch basin cleanings in this dewatering bed instead of dewatering at the Service Department. It was not known if this dewatering bed has a drain which feeds back into the wastewater treatment plant, since the bed was quite full of ponded water and leachate. If the bed does have a drain, the Ohio EPA recommends that the street sweepings and catch basin cleanings be dewatered here so that all leachate will be contained within the bed and connected to the wastewater treatment plant.

FIELD INSPECTION WORKSHEET
MS4 SWMP Evaluation
City Hall Complex Field Inspection Worksheet

Permittee: City of Bedford	
Address of facility: 165 Center Road	Size of facility: 5 acres
Date of visit: September 11, 2013	Time of visit: 12:45 PM
Provide the name(s) and title(s) of permittee staff present during inspection	
Name	Title
<i>Shawn Francis</i>	<i>Superintendent of Public Works</i>
Evaluator Observations:	
SWP3 or Storm Water Pollution Prevention Plan	
Has the maintenance facility developed an SWP3 or stormwater plan?	YES
Does the plan include a site map, list of pollutant sources, BMPs, and maintenance procedures?	The plan does not include a site map.
Does the permittee conduct and document periodic inspections of the facility?	NO
Are storm drains labeled and free of debris?	Storm drains are free of debris.
Vehicle maintenance, fueling and washing	
Are vehicle maintenance activities conducted in a designated place not exposed to stormwater?	Vehicle maintenance activities are not conducted at this facility.
Are fueling stations properly designed with spill kits nearby?	There are no fueling stations at this facility.
Are vehicles washed on-site? Is wash water discharged to the MS4 or sanitary sewer?	Vehicles are washed inside the garage where the floor drains connect to the sanitary sewer.
Material storage	
Are all materials that are potential stormwater contaminants stored under cover or in secondary containment?	YES
Hazardous waste management	
Are all hazardous materials properly labeled and stored to prevent exposure to stormwater runoff?	Hazardous materials are not stored at this facility.
Waste management	
Are waste bins covered with waste properly disposed in containers?	YES
How is landscape waste stored?	Landscape waste is not stored at this facility.
Spill response	
Does the facility have a spill response plan, and are spill kits readily available?	The facility has a spill response plan.
Employee training	
What type of stormwater training do maintenance staff receive?	Staff has not received training. Please be sure to include employees from this facility in the City's upcoming annual training events.
Notes or additional information:	
Site Map	
The City has not developed a site map of this facility for the SWP3. The site map must indicate the location of potential pollutant sources, the control measures (best management practices) implemented to minimize or eliminate the discharge of pollutants, and the drainage systems and patterns. The map should show all catch basins, storm sewers and points of discharge for storm water from this facility and delineate drainage areas to each outfall. Refer to Part	

5.1.2 of the Ohio EPA General NPDES Permit for Industrial Activities #OHR000005 for further guidance on developing this site map. This permit can be downloaded from the Ohio EPA website at http://www.epa.ohio.gov/dsw/permits/GP_IndustrialStormWater.aspx.

Inspections

Routine inspections must be conducted for this facility at a frequency specified in the SWP3. The Ohio EPA strongly recommends the use of storm water inspection checklists for the facility to standardize inspections and remind the inspector of the critical areas that must be reviewed during an inspection. Checklists are included in the SWP3 for this facility. Employees should always keep an eye out for spills or leaks from vehicles stored outside and be trained to react correctly to such a situation. If a vehicle is found to be leaking oil, place a drip pan under the leak and soak up the spilled oil with oil dry. The vehicle must be serviced as soon as possible.

Oil/water Separator

An oil/water separator is located outside the Fire Department and connects to the sanitary sewer on Center Road. 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.