

# Village of Grafton

Storm Water Management Plan





2021





Prepared By:

Poggemeyer Design Group 1168 North Main Street Bowling Green, Ohio 43402 www·poggemeyer·com



#### Certification

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, information submitted is, to the best of my knowledge, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

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#### **Table of Organization**

The Village of Grafton is responsible for the Village's Storm Water Master Plan:

Village Mayor

Village Council

Village Administrator

Village Service Department Superintendent

#### **Control Measures:**

- Public Education/Outreach
   Contact: Joe Price, Village Administrator
- 2. Public Participation/Involvement Contact: Joe Price, Village Administrator
- 3. Illicit Discharge Detection/Elimination
  Contact: Greg Kendle, Service Department Superintendent
- 4. Construction Site Runoff Control
  Contact: Greg Kendle, Service Department Superintendent
- Post Construction Runoff Control Contact: Greg Kendle, Service Department Superintendent
- 6. Pollution Prevention/Good Housekeeping
  Contact: Greg Kendle, Service Department Superintendent

Contact:

Village of Grafton 960 Main Street Grafton, OH 44044

Joe Price, Village Administrator Telephone Number: 440-926-2401

Fax: 440-926-9018

Email Address: Jbprice@villageofgrafton.org

Greg Kendle, Service Department Superintendent

Telephone number: 440-926-2260

Emergency Contact Number: 330-465-1648
Email address: <a href="mailto:gekendle@villageofgrafton.org">gekendle@villageofgrafton.org</a>

#### **Inventory of Village Facilities**

- 1. Grafton Village Hall, 960 North Main Street
- 2. Grafton Wastewater Treatment Plant, 1013 McAlpin Court
- 3. Substation and Salt Storage Shed, 1056 Vivian Drive
- 4. Maintenance Garage, 1080 Cleveland Street
- 5. Grafton Police & Fire Department, 1009 and 1013 Chestnut Street
- 6. Grafton Fire Station #2, 1050 Novak Road @ North Park
- 7. Grafton North Park Community Center: North Park is located on the north side of the Village, near Novak Road and Elm Street. The Park offers a picnic shelter, restrooms, playground equipment, splash pad, basketball court, and a community room as well as Fire Station #2.
- 8. Grafton Willow Park and Pavilions: Willow Park is located on Main Street at the southeast corner of the Village. The Park has two picnic shelters, restrooms, playground equipment, a concert and stage venue, and a baseball diamond.
- 9. Grafton Reservoir Park: Reservoir Park is located across the street from Willow Park on South Main Street. Reservoir Park includes the Village's reservoir, four baseball diamonds and a restroom and concession stand facility.
- 10. Grafton Bicentennial Park: Pocket park located at the intersection of Main and Mechanic Street. This Park offers a gazebo with benches and a walkway.

Lorain County Metro Parks Trail: The Village along with the Lorain County Metro Parks has developed a trail from behind Grafton Lanes on Main Street, to a trail owned and maintained by the Metro Park System. This trail leads to Indian Hollow Metro Park on Parsons Road.

#### Introduction

In accordance with 40 CFR Part 122.32 and Ohio Law, the Village of Grafton, Ohio, is renewing the Notice of Intent (NOI) and required Storm Water Management Plan (SWMP). The Village's Permit Number is 3GQ00016\*CG. The general permit expired on January 30, 2019. NPDES Permit No. OHQ000004 was issued 4/01/2021.

General Permit OHQ000004 designates the Village of Grafton as a discharger to a stream that has an approved US EPA TMDL. The TMDL pollutant identified is Total Phosphorus. The Village of Grafton is located within Lorain County and discharges to the Black River.

This updated SWMP defines how the Village will continue to implement and enforce a storm water management program which now also includes BMPs for phosphorus education and reduction. It addresses the six minimum control measures that are required by state regulations to achieve the goal of reducing the discharge of pollutants to the maximum extent practicable (MEP), protect water quality, and satisfy the appropriate requirements of the Clean Water Act (CWA). The SWMP includes documentation of the Village of Grafton's legal authority to implement the general permit. The renewal Notice of Intent (NOI) was submitted May 19, 2021 and the updated SWMP is submitted April 1, 2022 with the annual report as required.

#### **Legal Authority**

The Village of Grafton passed a Storm Water Protection ordinance on 2/8/2003. With the issuance of the new General Permit, the Village has updated Chapter 1050 to include the new requirements of the General Permit. The updated ordinance is attached as **Exhibit A**. Both industrial and municipal discharges is addressed. The Village also modified its Zoning Ordinance to include Chapter 1295 *Construction and Post Construction Site Soil Erosion, Sediment, Storm Water Runoff and Storm Water Quality Controls and Regulations* which implemented additional construction and post construction regulations and enforcement authority for the Village. Chapter 1295 is included as **Exhibit B**.

The Village has both the fiscal authority and legal resources to fully implement its Storm Water Management Plan. The Village Administrator of the Village of Grafton, Ohio, has been designated and given the authority to manage and administer this program.

#### **Permit Coverage Area**

Included in this Storm Water Management Plan are all areas within the corporation limits of the Village of Grafton. 2019 Census data reports the population of the Village of Grafton is 5,707 (which includes the population of the Prisons), whereas the residential population is approximately 2,200. The Village contains 35 miles of roadways and has provided a storm water map showing the storm water outfalls to the waters of the State. **Exhibit C** shows the location of the Village of Grafton and **Exhibit D** is a map of the Village of Grafton's storm sewer system.

#### **Reporting Requirements**

The Village of Grafton will annually submit a report that will include the status of compliance with the permit conditions, a review of the Best Management Practices (BMPs) and their applicability in achieving the defined measurable goals, and progress made in achieving the measurable goals for each of the six minimum control measures. The EPA's report form is included as **Exhibit E**.

#### **Storm Water Management Program**

The Village has maintained a Storm Water Management Plan (SWMP) since the inception of the MS4 regulations. Best Management Practices (BMPs) have been added to the existing SWMP meet the new requirements of NPDES Permit No. OHQ000004 to meet the pollution control targets of the Total Maximum Daily Load (TMDL).

The Village of Grafton discharges stormwater to the Black River Watershed which has a U.S. EPA approved TMDL for Phosphorus as shown on Appendix A of the General Permit and/or the 2012 Great Lakes Water Quality Agreement Annex 4. The minimum control measures are expected to meet the phosphorus pollution targets of the TMDL.

The Village's Storm Water Management Plan (SWMP) outlines the six minimum control measures that are expected to result in reductions in pollutants discharged by the Village. Typical identified sources of phosphorus in urban runoff include plant and leaf litter, soil particles, pet waste, road salt, fertilizer, and atmospheric deposition of particles. The previously identified water quality pollutants within the Village were oil, grease, pesticides, fertilizers, antifreeze, trash, and road salt.

There are only light industrial manufacturing facilities in the Village. There are no schools located within the Village's permit coverage area. There are no home sewage treatment facilities or on-site sewage systems within the Village.

The Village will complete an annual evaluation of the SWMP to measure the effectiveness of its program using the EPA's Program Evaluation Worksheets included in **Exhibit F**. The Village will identify modifications and improvements needed to maximize the SWMP effectiveness as necessary to achieve compliance with its permit.

Six minimum controls will address the identified water quality pollutants. The six minimum controls are addressed separately:

- Public Education/Outreach
- 2. Public Participation/Involvement
- 3. Illicit Discharge Detection/Elimination
- Construction Site Runoff Control
- 5. Post Construction Runoff Control
- 6. Pollution Prevention/Good Housekeeping

#### **Public Education/Outreach**

The Village of Grafton provides the administration of the Public Education/Outreach measure. The Village has chosen and will continue a variety of best management practices (BMPs) to address the grease and oil, trash, fertilizer, pesticides, and antifreeze pollutants. This control measure targets homeowners, restaurants, business owners, and the general public. Educating targeted audiences within the community is essential to improving the quality of the area waters and a vital element in achieving a successful storm water management program. The goal is to continue to distribute educational materials and perform outreach to inform citizens about the impacts polluted storm water runoff discharges can have on water quality.

The Village of Grafton has implemented a public education program that includes distributing educational information to the community, and the Village will continue to conduct outreach activities about the impacts of storm water discharges on water bodies that includes the steps the public can take to reduce pollutants in storm water runoff including specific information on phosphorus reduction.

The public education program provides information to individuals and households about the steps they can take to reduce storm water pollution, such as ensuring the proper use and disposal of landscape and garden chemicals including fertilizers and pesticides, and proper disposal of used motor oil, antifreeze, and household hazardous wastes. The Village has partnered with Lorain County for recycling programs and encourages residents and businesses to participate. The Village has partnered with Black River Remedial Action Plan (RAP) and provides information on how to become involved in local stream restoration activities.

The Village's public education and outreach program includes distributing information, providing public service announcements, providing educational material from a Village Hall Center and the Village's website, and implementing educational programs targeted at school age children. In addition, educational materials will be distributed to commercial entities. The Village will continue to provide storm water related information to all residents through notices sent with utility bills. The goal is to reach 100% of the Village residents. The Village will distribute educational information to all commercial businesses that will outline BMPs that reduce urban runoff volume and pollutant concentrations that result from their operations.

The school in Grafton is closed; therefore, publications mailed to all residents will include material for school age children. Educating schoolchildren in storm water issues will allow children to learn about environmental issues early, so that they will become interested and perhaps involved at earlier ages. Schoolchildren often tell their parents what they learn in school; therefore, teaching children about storm water is an effective way to pass environmental awareness to their parents and throughout the entire community. The Village will provide educational material to educate children in the water cycle, the watershed, storm water runoff, phosphorus reduction and impacts, pet waste, alternative products, and household general and hazardous waste.

The education effort for homeowners will target recycling, the proper disposal of pet waste, household products, used motor oil, pesticides, fertilizers, antifreeze, and other household hazardous wastes along with how these BMPs help reduce phosphorus in the watershed.

#### **Measurable Goals and Timeline:**

#### Continue Annually (2021 - 2026):

- Update the Zoning Ordinance Chapter 1295
- 2. Provide educational information at the Village Hall and Village Website.
- 3. Provide notices from Black River RAP activities published on the Village's Website and published in the local newspaper including information on how citizens can be involved.
- 4. Provide storm water related information to all residents targeting school age children including educational material on phosphorus.
- 5. Provide educational information to all residents for a minimum of five (5) themes: 1) address phosphorus impacts and reduction, 2) the proper disposal of oil, grease, antifreeze, 3) proper use and disposal of pesticides, fertilizers, and other household hazardous wastes, 4) Illicit discharge and elimination 5) Notification of the Litter and Pet Waste Ordinances and recycling schedules.
- 6. Provide educational information to each business/restaurant and each auto maintenance facility.
- 7. Continue partnership with Lorain County for participation in the County's recycling program and hazardous waste pick-up.
- 8. Publish recycling site locations in local newspaper.
- 9. Discuss and provide storm water program information at the Village Council open forum biannually.
- 10. Conduct an evaluation of the effectiveness of each BMP annually and modify or implement improvements as needed.
- 11. A Litter ordinance has been adopted.
- 12. A Pet Waste ordinance has been adopted.

#### Annual Measurement (2021 – 2026):

- Document the number of brochures distributed and website views.
- Document the number of utility bill storm water notices distributed to homeowners and industries.
- Document the number of brochures taken from the Village Hall Information Center.
- Document the amount of hazardous waste collected at the designated drop-off site.
- Document the volume of recyclables collected.
- Document the number of Litter ordinance citations.
- Document the number of Council meetings that addressed the storm water program and issues.
- Conduct an evaluation of the effectiveness of each BMP and modify or implement improvements as needed.

#### **Public Participation/Involvement**

The Village of Grafton provides the administration of the Public Participation control measure. Public support and involvement is critical to the success of the storm water management plan. The Village's public participation/involvement measures include all social and economic groups. The Village will conduct five (5) public involvement activities during the 5-year permit term with a minimum of one (1) activity specifically targeting phosphorus education/reduction practices:

- 1. The Village will continue to advertise and hold public meetings to encourage residents to participate in the program, voice concerns and provide ideas annually at a minimum. Each annual public meeting will include an educational segment on phosphorus.
- The Village has partnered will Black River RAP to encourage cleanup projects for local streams and riparian corridors and will continue to promote an annual cleanup event for residents.
- 3. The Village has partnered with Lorain County in a recycling program that targets plastic, glass, oil, and antifreeze. The Village will host the pickup location in Grafton once during the 5-year cycle; different communities within Lorain County that participate in the program host the pickup site.
- 4. The Village will continue to support and provide an Information Center at the Village Hall with volunteer sign-up sheets for stream clean-up and Black River RAP programs. The Information Center will also provide educational materials to aid in soliciting volunteers.
- 5. The Village sponsors a tree planting program and will annually conduct tree planting with residents.

#### **Measurable Goals and Timeline:**

#### Continue Annually (2021 – 2026):

- 1. Notices of public meetings and event schedules will be published in the local newspaper annually and listed on the Village's website.
- 2. Continue participation in Black River RAP for wetlands planting and stream clean-up volunteer opportunities. The Village will post events, encourage participation in the events and publish storm water related information on its website.
- 3. The Village will host the recycling pickup location (which is rotated between participating communities within the County) once during the five (5) year program.
- 4. Village will continue to support and provide an Information Center at the Village Hall with volunteer sign-up sheets for stream clean-up and Black River RAP programs. The Information Center will also provide educational materials to aid in soliciting volunteers and encourage citizen input and participation.

- 5. Continue the tree planting program and encourage residents to participate in tree planting annually.
- 6. Storm drains are required to be imprinted with "no dumping" or other storm water related awareness message imprinted on all replaced drain lids and on all new storm drains.
- 7. Conduct an evaluation of the effectiveness of each BMP annually and modify or implement improvements as needed.

#### Annual Measurement (2021 – 2026):

- Document the number of Public Meetings addressing storm water related issues and the number of residents attending the meetings.
- Document the number of residents attending Black River RAP events.
- Document recycling pickup events and amount of participation.
- Document the amount of recycling collected.
- Document the number of trees planted and participants.
- Document the number of storm drains installed with imprinted storm water awareness messages.
- Conduct an evaluation of the effectiveness of each BMP and modify or implement improvements as needed.

#### **Illicit Discharge Detection Elimination**

The Village of Grafton's is responsible for the Illicit Discharge Detection and Elimination Program. The Village will continue to monitor the system for illicit discharges and enforce elimination of the identified discharges. Identified priority areas will continue to be monitored through visual inspection. The Village will continue providing information to the general public of hazards associated with illegal discharges and encouraging public participation in the detection and elimination program. The strategies adopted by the Village of Grafton are as follows:

The Village has developed a storm sewer collection mapping system that includes storm sewers, outfalls to receiving streams, catch basins, pipes, culverts, and other storm water related structures. The map will be updated to include retention/detention ponds and post-construction water quality BMPs both public and private within the five-year permit period.

Throughout the detection program, illicit discharges will be identified and eliminated. The Ohio EPA will be notified of any illicit discharges are detected discharging to the MS4 including illicit sanitary cross connections from industrial, commercial, or multi-family sources; and leaking or broken sanitary sewer lines that are actively contributing sewage to the MS4. Notification shall include the location, general description, date, and approximate time the illicit discharge was discovered. Such notification shall be made to the appropriate Ohio EPA district office within twenty-four (24) hours of discovery of the source.

The only EPA designated industrial facilities within the Village is the Village's Wastewater Treatment Plant and the Maintenance Garage. Only the Maintenance Facility has an individual SWP3. There are only light manufacturing industrial facilities within the Village. There are no septic tanks or on-site sewage systems within the Village. There are no sanitary sewer overflows within the Village.

The Village will provide educational brochures on the hazards associated with illegal discharges to all residents as stated in the Public Education and Public Involvement measures.

The Village has in-place legislation prohibiting illicit discharges. Enforcement action is included in the legislation and will be taken against property owners found to be in noncompliance.

#### **Measurable Goals and Timeline:**

Continue annually (2021 – 2026) or as noted below:

- Update and verify completeness of the storm sewer mapping and include the new requirements for retention/detention pond and post-construction water quality BMPs both public and private. The new requirements will be completed by the end of the 5-year permit term with at least 20% completed annually.
- 2. Review the illicit discharge ordinance for any needed updates to meet EPA requirements.

- Continue providing information to residents, businesses, and employees on illicit discharge education.
- 4. Provide annual employee training that includes illicit discharge detection and elimination topics.
- 5. Continue yearly inspections of grease traps of commercial businesses.
- 6. Visually inspect all outfalls and record inspection results.

#### Annual Measurement (2021 – 2026):

- Total number of MS4 outfalls inspected.
- Number of outfalls with dry weather screening.
- Number of outfalls where dry weather flows were identified.
- Document the number of illicit discharges identified and reported to the EPA within 24hours.
- Document the number of illicit connections corrected.
- Document the number of illicit connections identified but not corrected including details on the location, an estimate of volume (gpd), the source and the type continuous/intermittent/one-time), the types of pollutants believed to be present, the receiving surface water and an estimated schedule for elimination.
- Document the number of residents and businesses reached through the distribution of brochures.
- Document the amount of hazardous waste collected.
- Document the number of inspections of grease traps and corrective actions taken.
- Document number of employees trained in identifying and eliminating illicit discharges.
- Document amount of mapping completed.
- Conduct an evaluation of the effectiveness of each BMP annually and modify or implement improvements as needed.

#### **Construction Site Runoff Control**

The Village of Grafton's is responsible for the Construction Site Runoff Control measure. The Village has adopted regulations and implemented control measures for construction site runoff and for enforcement of its erosion and sediment control plan. The control plan includes standard detailed drawings and specifications for construction site runoff control as well as enforcement regulations. Through this ordinance, the Village regulates land disturbance of one acre or greater.

The ordinance requires developers to submit construction plans for review and approval that include a written plan (SWP3) containing measures to reduce soil erosion and control sediment runoff. Each submitted plan requires review and approval by the Village prior to beginning construction and fines can be levied for noncompliance. The Village will complete a checklist to document each plan review, any communications regarding the review and plan revisions and any notification to obtain NPDES permit coverage shall be maintained.

The Village staff will continue to review plans and inspect construction sites. Once the plan is reviewed and approved, the staff is responsible for making sure developers comply with the plan. If noncompliance is found, the Village may issue a permit violation, stop work order, fine, or other measure.

If a construction site has any of the following compliance issues, the site will be inspected every 14 days until the site is incompliance and then inspection will resume on a monthly basis:

- 1. Construction activities have started at the site with no SWP3 reviewed and approved by the MS4:
- 2. Failure to install sediment basin(s) when the SWP3 and/or site drainage clearly indicate as a first step (within 7 days prior to grading and within 7 days of grubbing).
- 3. Construction activities taking place with no sediment/erosion controls; or
- 4. Dewatering activities resulting in turbid discharges.

#### **Measurable Goals and Timeline:**

Continue annually (2021 – 2026) or as noted below:

- Review the Construction Site Runoff and Sediment Control regulations and update the regulations and specifications to incorporate the new General Permit regulations. Update the Zoning Ordinance Chapter 1295 by December 2021.
- 2. Review site inspection procedures.
- 3. Develop and review the SWP3 plan review checklist within the first year of implementing this SWMP by December 2021.
- 4. Provide developers with educational material on phosphorus reduction.

#### Annual Measurement (2021 - 2026):

- Document and list the number of site inspections and checklists completed.
- Document the number of SWP3 and plans reviewed and approved.
- Document the number and frequency of inspections.
- Document the number of plan citations issued.
- Document the number of enforcement actions taken.
- Document the number of complaints received and addressed.
- Document the number of educational brochures distributed to designers and contractors.
- Conduct an evaluation of the effectiveness of each BMP annually and modify or implement improvements as needed.

#### Post-Construction Runoff Control in New Development/Redevelopment

The Village of Grafton is responsible for the Post-Construction Runoff Control in New Development/Redevelopment. The Village's post-construction runoff control in new development/redevelopment measure includes reviewing and analyzing practical BMPs. The review will increase both structural and nonstructural practices. The goal will be to develop and implement improved development and redevelopment area storm water management.

The Village has adopted legislation that governs post-construction runoff control that requires and enforces BMPs for improved quality of storm water discharge for both new development and redevelopment areas that disturb one acre or more.

The nonstructural BMPs include a review of existing ordinances and subdivision regulations to improve preventive actions, management, and source controls. The review of existing policies will take into consideration land use planning, identification of sensitive areas, optimizing open space, providing buffers, and minimizing soil disturbance. The nonstructural BMPs will also include improved public awareness for both residents and developers.

Various methods will be used to reduce impervious cover and maintain pre-development runoff conditions: The Village of Grafton will adopt smart growth initiatives to limit growth in green areas and focus them to the inner Village through land use planning, zoning, and subdivision regulations. The Village will review and organize traffic patterns to maximize the available roadway system in order to limit future needs of additional roadways. Development will be encouraged to occur in certain corridors with adequate public utilities to avoid and minimize construction site runoff.

Structural BMPs that are currently in place (constructed) by developers and approved by the Village will be evaluated to determine their effectiveness for reducing storm water impact. The Village will develop a maintenance program to insure proper operation. Based on evaluation of the maintenance program, the Village will continue to review the existing design criteria for achieving the BMPs and will revise existing ordinances and construction regulations to improve the quality of storm water discharge by controlling construction wastes in order to limit discharges to the water system. The ordinance will include regulations for discarded building materials, concrete truck washout, chemicals, litter and sanitary waste at the construction site, and chemical drum and fuel tank storage.

As part of ensuring appropriate implementation of structural BMPs, the Village will review and approve all design prior to construction and will complete both construction and post-construction inspections. The Village will maintain a log for complaints received, complain investigations and documentation of the corrective procedures and resolution of the complaint.

The Village will develop an ordinance and standard agreement to ensure that long-term O&M plans are in place for all applicable sites, including after changes of ownership. The Village will

inspect all private and public post-construction runoff controls to ensure it is maintained per existing long-term O&M plans, agreements, and local ordinances at least once during this permit term. A checklist for inspection will be developed to document each site review. A copy of the long-term O&M plans and agreements and inspections will be maintained.

#### **Measurable Goals and Timeline:**

Continue annually (2021 – 2026) or as noted below:

- 1. Develop an inspection and maintenance schedule specifically for each existing structure by December 31, 2021.
- 2. Develop a check list for inspecting sites by <u>December 31, 2021</u>.
- 3. Develop and ordinance and standard agreement to ensure long-term O&M plans are in place for all applicable sites that includes after changes of ownership by <u>December 31</u>, 2022.
- Review and revise the existing ordinances and subdivision regulations as they relate to storm water collection, storage, and treatment and to require OHC000005 Table 4b practices and/or other green infrastructure practices where feasible by <u>December 31, 2022</u>.
- 5. Review and revise, if necessary, the standard detailed construction drawings, specifications, and ordinances for storm water management after construction.
- 6. Review and revise, if necessary, the Village's preconstruction review and approval process for development.
- 7. Review and revise, if necessary, the ordinances and subdivision regulations to reflect any needed revisions.
- 8. Review inspection and maintenance reports annually to determine compliance with design and operational goals.
- 9. Provide information and encourage low impact development which reduces impervious cover to developers and builders.

#### Annual Measurement:

- Document number of applicable sites in your jurisdiction requiring post-construction controls for the reporting year.
- Document number of pre-construction SWP3 reviews and approvals for post-construction runoff controls.
- Document number of inspections verifying that post-construction runoff controls were built per requirements.
- Document number of enforcement actions taken for failure to adequately install postconstruction runoff controls and the number of enforcement actions taken for failure to maintain.
- Document number of long-term O&M plans developed and agreements in place for postconstruction runoff controls.
- Document number of long-term O&M inspections performed on post-construction controls (number performed by MS4 and number performed privately); and

- Document any activities taken to satisfy your post-construction storm water management program TMDL performance standard.
- Conduct an evaluation of the effectiveness of each BMP annually and modify or implement improvements as needed.

#### **Pollution Prevention/Good Housekeeping for Municipal Operations**

The Village of Grafton is responsible for the Pollution Prevention/Good Housekeeping control measures for the Municipal Operations. The Village's program goal is to reduce pollutant runoff from municipal operations. The Village will continue to provide regular vehicle inspections to eliminate the amount of oil, grease, and fluid leaks. The vehicle maintenance schedule will be publicly posted at the maintenance facility and employees will receive instructions for preventing pollution from automobile maintenance activities.

The Village will continue to provide a recycling container and collect oil from municipal operations. It is typical that a vehicle maintenance program can significantly reduce loadings of hydrocarbons, trace metals, and other pollutants that can affect the quality of storm water runoff. A vehicle washing area will be designated and employees will be required to use this area for all vehicle washing.

The Village will provide a structured training program for employees that will include illicit discharge detection and elimination, phosphorus impact and reduction, proper hazardous material handling and storage practices and in pesticide handling and safe lawn care techniques. Information on alternative products will be posted at the maintenance facility and at the Village Hall and distributed to homeowners.

The Village will reduce the amount of road salt currently distributed on Village streets (as much as possible) by adjusting application rates, concentrating application to identified critical areas and if possible, by using alternative products. Salt is very soluble when it comes in contact with storm water, it can migrate into ground water used for public water supplies and contaminate surface waters.

Street cleaning will continue to be performed to minimize pollutant export to receiving waters. The Village will continue to monitor and watch for any illegal dumping and continue to residents of the environmental impacts of illegal dumping. There are many risks to public safety and water quality associated with illegal disposal actions so continued illegal dumping control is important to preventing contaminated runoff from entering wells and surface water, as well as averting flooding due to blockages of drainage channels for runoff.

The Village has established a storm sewer catch basin cleaning program to reduce the amounts of pollutants, trash, and debris both in the storm drain system and in receiving waters. The Village will continue to annually send brochures to all residents on illegal dumping and the proper disposal of wastes.

The Village contracts with a private lawn care specialist for the application of pesticides and fertilizers. A copy of a pesticide, herbicide and fertilizer application plan is included in Appendix G.

#### **Measurable Goals and Timeline:**

Continue annually (2021 – 2026) or as noted below:

- Provide annual employee training for illicit discharge detection and elimination, phosphorus impact and reduction, proper hazardous material handling and storage practices, pesticide handling and safe lawn care techniques, and in automobile maintenance pollution prevention.
- 2. Continue the vehicle maintenance program. Publicly post the maintenance schedule at the Village's maintenance building.
- 3. Continue to provide a recycling facility to collect oil from municipal operations that has a spill prevention device.
- 4. A vehicle washing area has been designated and employees are required to use this area for all vehicle washing.
- 5. Perform an annual inventory of all hazardous products, pesticides, fertilizers, etc. stored at the maintenance facility. Ensure all products are labeled accordingly and maintained in the clearly marked locked storage area.
- 6. Provide information to homeowners on illegal dumping.
- 7. Continue the storm drain cleaning program. Clean 20% of storm drains each year for the permit term.
- 8. Attempt to reduce the use of road salt using gravel/road grindings as an alternative when feasible.

#### Annual Measurement:

- Document and summarize each training session, number of employees attending and topics including phosphorus.
- Document the amount of road salt applied.
- Document the amount of oil collected at the recycling facility and how it is disposed of.
- Document the number of preventive maintenance procedures performed on municipal vehicles.
- Document the number of miles of streets cleaned and the amount of trash removed from streets and catch basins and how it is disposed of.
- Document the volume of pesticides applied by the Village and measures taken to minimize usage.
- Document the volume of fertilizers used by the Village and measurers taken to minimize usage.

- Summarize any new or existing flood management projects that were assessed for possible impacts on water quality.
- Summarize activities performed that provide reduction in phosphorus.
- Conduct an evaluation of the effectiveness of each BMP and modify or implement improvements as needed.

# **EXHIBIT A**

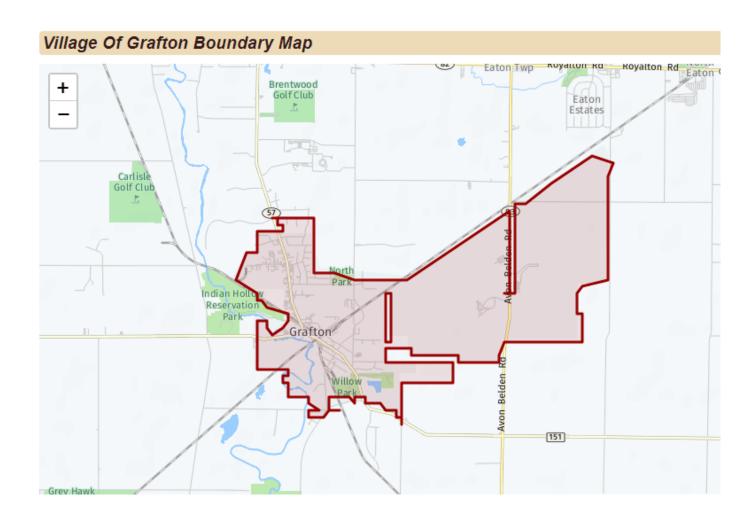
Storm Water Protection Ordinance 03-004

# **EXHIBIT B**

Construction and Post Construction Zoning Ordinance 1295

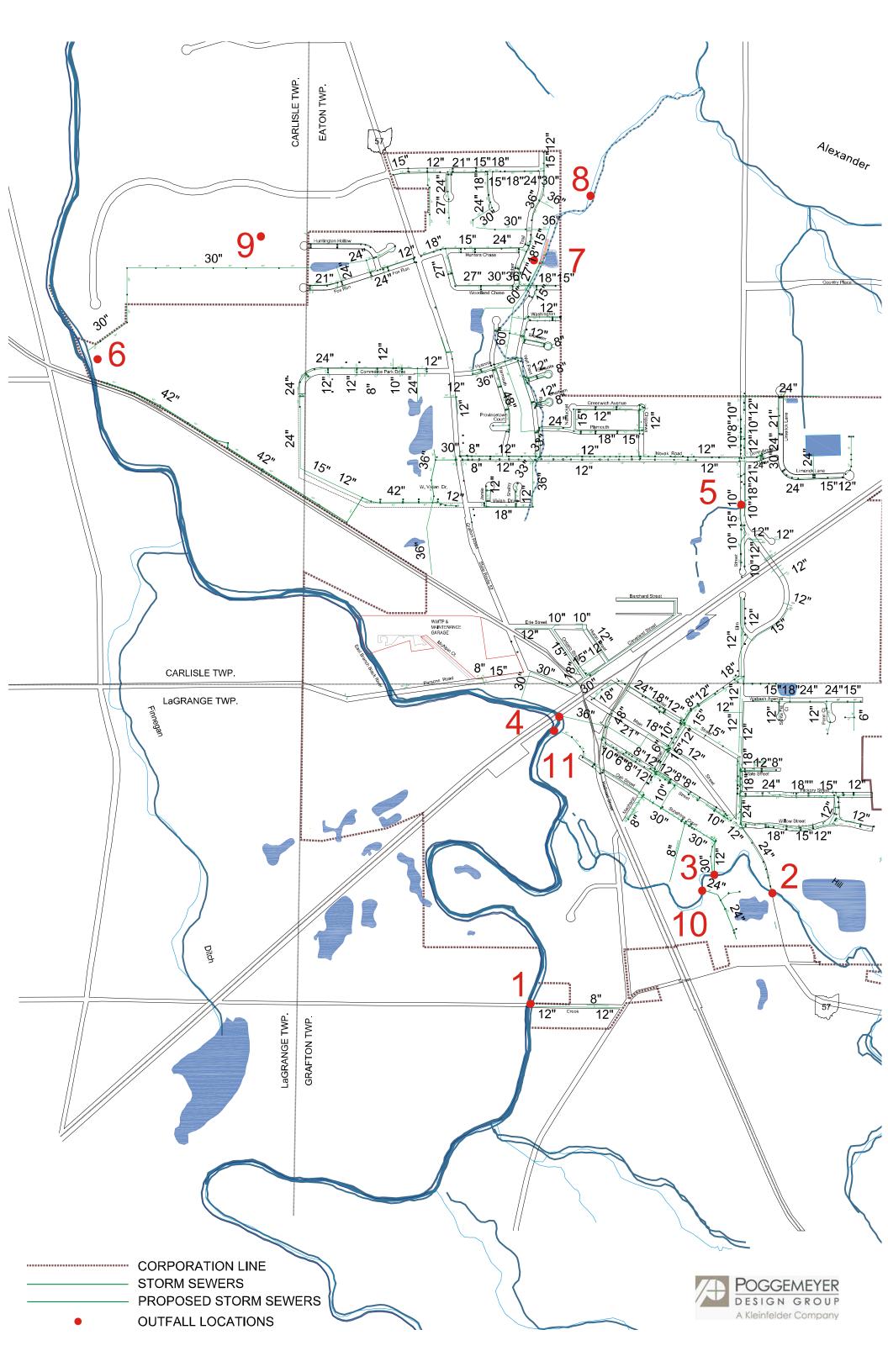
# **EXHIBIT C**

Village of Grafton **Location Map** 



# **EXHIBIT D**

Village of Grafton Storm Sewer Maps



# **EXHIBIT E**

**EPA Annual Report Form** 



# NPDES Small MS4 General Permit (OHQ000003) Annual Reporting Form

Instructions for completing this form:

- OHQ000003 requires that this form be used when submitting annual reports. You may request approval to use your own reporting format.
- Annual Reports are due annually on or before April 1st.
- Complete the form and sign and date the certification statement below.
- If more space is needed than is provided, identify within the provided space that Attachment A, B, C, etc. has been attached.
- If an item of the form is not applicable for your program (such as street sweeping), fill in N/A in the space provided.
- Don't include attachments such as brochures, newspaper clips, sign-in sheets, etc. related to your program with this form. You only need to summarize these within this report. These records must be filed and will be needed during program audits.
- When complete, submit this Annual Report form to the following address:
   Ohio Environmental Protection Agency
   Division of Surface Water
   Storm Water Program Small MS4
   P.O. Box 1049

Columbus, Ohio 43216-1049

Small MS4 Annual Report for Year:
Ohio EPA Facility Permit Number:

| Name of MS4:  |                          |                 |   |
|---|--------------------------|-----------------|---|
| Primary Contact:  |                          | Title:          |   |
| Mailing Address:  |                          | •               |   |
| City:   | Zip Code:                |                 | County:   |
| Telephone Number:   | Email Address:           |                 |   |
|   | •                        |                 |   |
| Include or attach a Table of Organization. Indicate who (r<br>your program, and if different, each minimum control mea<br>agencies and departments occur. Also, identify any Mem        | sure of your program.    | Identify how de | velopment and implementation across multiple positions, |
|   |                          | 7               | <u> </u>  |
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| I certify under penalty of law that this document and all att<br>designed to assure that qualified personnel properly gathe<br>manage the system, or those persons directly responsible | er and evaluate the info | ormation submit | ted. Based on my inquiry of the person or persons who   |
| belief, true, accurate and complete. I am aware that there imprisonment for knowing violations.   |                          |                 |   |
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| Print Title:  |                          |                 |   |
| Signature:  |                          | Dat             | e:  |
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# SMALL MS4 ANNUAL REPORT FORM

State of Ohio Environmental Protection Agency

| PUBLIC EDUCATION & OUTREACH                          |  |
|--|--|
| <b>Estimate Your Permit Area's Total Population:</b> |  |

| BMP (mechanism) &<br>Responsible Party | Measurable Goal | Theme or Message | Target Audience | % of Target Audience<br>Reached | Summary of Results | Effective (Yes or No) |
|--|-----------------|------------------|-----------------|---------------------------------|--------------------|-----------------------|
|  |                 |                  |                 |                                 |                    |                       |
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State of Ohio Environmental Protection Agency

#### **PUBLIC EDUCATION & OUTREACH**

• Summarize activities you plan to undertake during the next reporting cycle.

| BMP (mechanism) &<br>Responsible Party | Measurable Goal | Theme or Message | Target Audience | % of Target Audience to<br>be Reached | Summary of Planned<br>Activities | Proposed Schedule |
|--|-----------------|------------------|-----------------|---------------------------------------|----------------------------------|-------------------|
|  |                 |                  |                 |                                       |                                  |                   |
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# SMALL MS4 ANNUAL REPORT FORM

State of Ohio Environmental Protection Agency

#### PUBLIC INVOLVEMENT/PARTICIPATION

| BMP (Activity) &<br>Responsible Party | Measurable Goal | Theme or Message | Target Audience | Estimate of People<br>Participated | Summary of Results | Effective (Yes or No) |
|---------------------------------------|-----------------|------------------|-----------------|------------------------------------|--------------------|-----------------------|
|                                       |                 |                  |                 |                                    |                    |                       |
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State of Ohio Environmental Protection Agency

#### PUBLIC INVOLVEMENT/PARTICIPATION

• Summarize activities you plan to undertake during the next reporting cycle.

| BMP (Activity) &<br>Responsible Party | Measurable Goal | Theme or Message | Target Audience | Estimate of People to<br>Participate | Summary of Planned<br>Activities | Proposed Schedule |
|---------------------------------------|-----------------|------------------|-----------------|--------------------------------------|----------------------------------|-------------------|
|                                       |                 |                  |                 |                                      |                                  |                   |
|                                       |                 |                  |                 |                                      |                                  |                   |
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State of Ohio Environmental Protection Agency

**ILLICIT DISCHARGE DETECTION & ELIMINATION (IDDE)** 

| ILLICIT DISCHARGE DETE                                 | CHON & ELIMINATION | IDDE)                    |   |                                     |                       |                  |                          |
|--|--------------------|--------------------------|---|-------------------------------------|-----------------------|------------------|--------------------------|
| BMP & Responsible Party                                | Measurable Goal    | Completed<br>(Yes or No) | Cite Local Code(s) (If available, web lir | ) Being Used<br>nk for code(s))     | Summary of Result     | ts or Activities | Effective<br>(Yes or No) |
| Ordinance or Other Regulatory<br>Mechanism             |                    |                          |   |                                     |                       |                  |                          |
| BMP & Responsible Party                                | Measurable Goal    | Completed<br>(Yes or No) |   | Summary of A                        | Activities or Updates |                  | Effective<br>(Yes or No) |
| Storm Sewer System Map                                 |                    |                          |   |                                     |                       |                  |                          |
| BMP & Responsible Party                                | Measurable Goal    | Completed (Yes or No.)   |   | Summary of A                        | Activities or Updates |                  | Effective<br>(Yes or No) |
| HSTS Mapping and List                                  |                    | (Yes or No)              |   |                                     |                       |                  | (Yes or No)              |
|  |                    | Completed                |   |                                     |                       |                  | Effective                |
| BMP & Responsible Party                                | Measurable Goal    | (Yes or No)              |   | Summary of A                        | Activities or Updates |                  | (Yes or No)              |
| IDDE Plan  |                    |                          |   |                                     |                       |                  |                          |
|  |                    |                          |   |                                     |                       |                  |                          |
| BMP & Responsible Party                                | Measurable Goal    | Completed<br>(Yes or No) | # of Outfalls<br>Screened                 | # of Dry-Weathe<br>Flows Identified | d L                   |                  | Effective<br>(Yes or No) |
| Dry-Weather Screening of Outfalls  Total # of Outfalls |                    |                          |   |                                     | Identified*           | Eliminated       |                          |

<sup>\*</sup>Include an attachment which provides schedules for elimination of illicit connections that have been identified but have yet to be eliminated.



# SMALL MS4 ANNUAL REPORT FORM

**OhioEPA** 

#### ILLICIT DISCHARGE DETECTION & ELIMINATION (IDDE)

• Summarize activities you plan to undertake for the next reporting cycle.

| BMP & Responsible Party                 | Measurable Goal | Summary of Planned Activities | Proposed Schedule |
|---|-----------------|-------------------------------|-------------------|
| Ordinance or Other Regulatory Mechanism |                 |                               |                   |
|   |                 |                               |                   |
| Storm Sewer System Map                  |                 |                               |                   |
|   |                 |                               |                   |
| HSTS Mapping and List                   |                 |                               |                   |
|   |                 |                               |                   |
| IDDE Plan                               |                 |                               |                   |
|   |                 |                               |                   |
| Dry-Weather Screening of Outfalls       |                 |                               |                   |
|   |                 |                               |                   |
|   |                 |                               |                   |



State of Ohio Environmental Protection Agency

#### CONSTRUCTION SITE RUNOFF CONTROL

| BMP & Responsible Party                      | Measurable Goal | Completed<br>(Yes or No) | Cite Loc<br>(If availal              | cal Code<br>ble, web                            | e(s) Bein<br>link for | ng Used<br>r code(s)) | Summary of Results or Activities | Effective<br>(Yes or No) |
|--|-----------------|--------------------------|--------------------------------------|---|-----------------------|-----------------------|----------------------------------|--------------------------|
| Ordinance or Other Regulatory<br>Mechanism   |                 |                          |                                      |   |                       |                       |                                  |                          |
| BMP & Responsible Party                      | Measurable Goal | Completed<br>(Yes or No) | Sta                                  | ndards  | Being U               | sed                   | Summary of Results or Activities | Effective<br>(Yes or No) |
| Sediment and Erosion Control<br>Requirements |                 |                          |                                      |   |                       |                       |                                  |                          |
| BMP & Responsible Party                      | Measurable Goal | Completed                |                                      | Comp  | laints                |                       | Summary of Results or Activities | Effective                |
| , ,  |                 | (Yes or No)              | Receive                              | d   | Follo                 | owed-Up On            | ,                                | (Yes or No)              |
| Complaint Process                            |                 |                          |                                      |   |                       |                       |                                  |                          |
| BMP & Responsible Party                      | Measurable Goal | Completed<br>(Yes or No) | # of Applica<br>Sites Requi<br>Plans | able<br>ring                                    |                       | of Plans<br>Reviewed  | Summary of Results or Activities | Effective<br>(Yes or No) |
| Site Plan Review Procedures                  |                 |                          |                                      |   |                       |                       |                                  |                          |
|  |                 |                          | Site In                              | spectio   | ns Perf               | ormed                 |                                  |                          |
| BMP & Responsible Party                      | Measurable Goal | Completed<br>(Yes or No) | # of<br>Applicable<br>Sites          | # Perfo   | ormed                 | Avg.<br>Frequency     | Summary of Results or Activities | Effective<br>(Yes or No) |
| Site Inspection Procedures                   |                 |                          |                                      |   |                       |                       |                                  |                          |
|  |                 | Completed                |                                      | Viola   | tions                 |                       |                                  | Effective                |
| BMP & Responsible Party                      | Measurable Goal | (Yes or No)              | # of Violat<br>Letters               | # of Violation # of Enforcement Letters Actions |                       |                       | Summary of Results or Activities | (Yes or No)              |
| Enforcement Procedures                       |                 |                          |                                      |   |                       |                       |                                  |                          |
|  |                 |                          |                                      |   |                       |                       |                                  |                          |

<sup>\*</sup>Include an attachment which identifies applicable sites within your jurisdiction for this reporting period.



# SMALL MS4 ANNUAL REPORT FORM



#### **CONSTRUCTION SITE RUNOFF CONTROL**

• Summarize activities you plan to undertake during the next reporting cycle.

| BMP & Responsible Party                   | Measurable Goal | Summary of Planned Activities | Proposed Schedule |
|---|-----------------|-------------------------------|-------------------|
| Ordinance or Other Regulatory Mechanism   |                 |                               |                   |
|   |                 |                               |                   |
| Sediment and Erosion Control Requirements |                 |                               |                   |
|   |                 |                               |                   |
| Complaint Process                         |                 |                               |                   |
|   |                 |                               |                   |
| Site Plan Review Procedures               |                 |                               |                   |
|   |                 |                               |                   |
| Site Inspection Procedures                |                 |                               |                   |
|   |                 |                               |                   |
| Enforcement Procedures                    |                 |                               |                   |
|   |                 |                               |                   |



State of Ohio Environmental Protection Agency

#### POST-CONSTRUCTION STORM WATER MANAGEMENT IN NEW DEVELOPMENT AND REDEVELOPMENT

| BMP & Responsible Party                    | Measurable Goal | Completed (Yes or No)    | Cite Local Co<br>(If available, w                       | ode(s) Being Used<br>reb link for code(s))     | Summary of Results or Activities | Effective (Yes or No)    |
|--|-----------------|--------------------------|---|--|----------------------------------|--------------------------|
| Ordinance or Other<br>Regulatory Mechanism |                 |                          |   |  |                                  |                          |
| BMP & Responsible Party                    | Measurable Goal | Completed<br>(Yes or No) |   | Structural Standards Being<br>Used             | Summary of Results or Activities | Effective<br>(Yes or No) |
| Post-Construction<br>Requirements          |                 | (Tes of No)              |   | Useu   |                                  | (Tes of No)              |
| BMP & Responsible Party                    | Measurable Goal | Completed<br>(Yes or No) | # of Applicable Sites<br>Requiring Post-<br>Const. BMPs | # of Plans Reviewed                            | Summary of Results or Activities | Effective<br>(Yes or No) |
| Site Plan Review Procedures                |                 |                          |   |  |                                  |                          |
| BMP & Responsible Party                    | Measurable Goal | Completed<br>(Yes or No) | -   | tions Performed                                | Summary of Results or Activities | Effective<br>(Yes or No) |
|  |                 | (Tes of No)              | # Performed   | Avg. Frequency                                 |                                  | (Tes of No)              |
| Site Inspection Procedures                 |                 |                          |   |  |                                  |                          |
| BMP & Responsible Party                    | Measurable Goal | Completed                | Vi  | olations                                       | Summary of Results or Activities | Effective                |
|  |                 | (Yes or No)              | # of Violation Letters                                  | # of Enforcement Actions                       | ,                                | (Yes or No)              |
| Enforcement Procedures                     |                 |                          |   |  |                                  |                          |
| BMP & Responsible Party                    | Measurable Goal | Completed<br>(Yes or No) | # of Sites Requiring<br>Plans/Agreements                | # of Plans<br>Developed/Agreements in<br>Place | Summary of Results or Activities | Effective<br>(Yes or No) |
| Long-Term O&M<br>Plans/Agreements          |                 |                          |   |  |                                  |                          |
|  |                 |                          |   |  |                                  |                          |



State of Ohio Environmental Protection Agency

#### POST-CONSTRUCTION STORM WATER MANAGEMENT IN NEW DEVELOPMENT AND REDEVELOPMENT

• Summarize activities you plan to undertake for the next reporting cycle.

| BMP & Responsible Party                 | Measurable Goal | Summary of Planned Activities | Proposed Schedule |
|---|-----------------|-------------------------------|-------------------|
| Ordinance or Other Regulatory Mechanism |                 |                               |                   |
|   |                 |                               |                   |
| Post-Construction Requirements          |                 |                               |                   |
|   |                 |                               |                   |
| Site Plan Review Procedures             |                 |                               |                   |
|   |                 |                               |                   |
| Site Inspection Procedures              |                 |                               |                   |
|   |                 |                               |                   |
| Enforcement Procedures                  |                 |                               |                   |
|   |                 |                               |                   |
| Long-Term O&M Plans/Agreements          |                 |                               |                   |
|   |                 |                               |                   |



**OhioEPA** 

POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

| BMP & Responsible<br>Party     | Measurable Goal  | Completed<br>(Yes or No)   | Topic(s)                | Targeted Aud                                    | ience    | # of Employees<br>Attended                     | Summary of Activity                       | Effective<br>(Yes or No)           |
|--------------------------------|------------------|----------------------------|-------------------------|---|----------|--|---|------------------------------------|
| Employee Training<br>Program   |                  |                            |                         |   |          |  |   |                                    |
|                                | List of Municipa | al Facilities Subject to P | rogram                  |   |          | Procedures Developed<br>Facilities (Yes or No) | # of Facility<br>Inspections<br>Performed | Frequencies of Such<br>Inspections |
|                                |                  |                            |                         |   |          |  |   |                                    |
|                                | Summarize N      | laintenance Activities a   | nd Schedules            |   |          | Summarize Acti                                 | vities Performed                          |                                    |
| MS4 Maintenance                |                  |                            |                         |   |          |  |   |                                    |
|                                | Procedures Deve  | loped (Yes or No)          |                         | Docu  | ıment Aı | mounts of Wastes Prope                         | rly Disposed                              |                                    |
| Disposal of Wastes             |                  |                            |                         |   |          |  |   |                                    |
|                                | Covered (        | Yes or No)                 | Tons Used               | Used Summarize Measures Taken to Minimize Usage |          |  |   |                                    |
| Road Salt                      |                  |                            |                         |   |          |  |   |                                    |
|                                | Procedures Deve  | loped (Yes or No)          | Gallons Used            |   |          | Summarize Measures T                           | aken to Minimize Usage                    |                                    |
| Pesticide &<br>Herbicide Usage |                  |                            |                         |   |          |  |   |                                    |
|                                | Procedures Deve  | loped (Yes or No)          | Pounds Used             |   |          | Summarize Measures T                           | aken to Minimize Usage                    |                                    |
| Fertilizer Usage               |                  |                            |                         |   |          |  |   |                                    |
|                                | Procedures Deve  | loped (Yes or No)          |                         | Document A                                      | lmount   | of Material Collected and                      | Properly Disposed                         |                                    |
| Street Sweeping                |                  |                            |                         |   |          |  |   |                                    |
|                                |                  | Summarize any Ne           | w or Existing Flood Man | agement Project                                 | s that w | ere Assessed for Impac                         | ts on Water Quality                       |                                    |
| Flood Management<br>Projects   |                  |                            |                         |   |          |  |   |                                    |



State of Ohio Environmental Protection Agency

#### POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

• Summarize activities you plan to undertake for the next reporting cycle.

| BMP & Responsible Party               | Measurable Goal | Summary of Planned Activities | Proposed Schedule |
|---------------------------------------|-----------------|-------------------------------|-------------------|
| Employee Training Program             |                 |                               |                   |
|                                       |                 |                               |                   |
| List of Facilities Subject to Program |                 |                               |                   |
|                                       |                 |                               |                   |
| MS4 Maintenance                       |                 |                               |                   |
|                                       |                 |                               |                   |
| Disposal of Wastes                    |                 |                               |                   |
|                                       |                 |                               |                   |
| Road Salt                             |                 |                               |                   |
|                                       |                 |                               |                   |
| Pesticide & Herbicide Usage           |                 |                               |                   |
|                                       |                 |                               |                   |
| Fertilizer Usage                      |                 |                               |                   |
|                                       |                 |                               |                   |
| Street Sweeping                       |                 |                               |                   |
|                                       |                 |                               |                   |
| Flood Management Projects             |                 |                               |                   |
|                                       |                 |                               |                   |

SMALL MS4 ANNUAL REPORT FORM



State of Ohio Environmental Protection Agency

| <ul> <li>ROPOSED CHANGES TO YOUR SWMP (IF ANY)</li> <li>Summarize any proposed changes to your SWMP, including changes to any BMPs or any identified measurable goals that apply to the program element of the program of the p</li></ul> | elements. |
|--|-----------|
|  |           |
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| ARIANCES GRANTED (IF ANY)  Identify and summarize any variances granted under your storm water program.  |           |
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# **EXHIBIT F**

**EPA Program Evaluation Worksheets EPA Field Inspection Reports** 

### Industrial/Commercial Component Worksheet

| Date of Evaluation    | <b>Instructions</b> : Use this worksheet as a guide for questioning MS4 staff and reviewing applicable documents. Keep in mind that additional questions may |
|-----------------------|--|
| Evaluator Name, Title | be necessary based on local regulations, MS4 permit requirements, implementation strategies, or water quality issues. Remember to obtain copies of any       |
| MS4 Permittee         | applicable documents or files which may assist in writing the MS4 evaluation report.   |

|      | Staff Interviewed |                    |  |  |
|------|-------------------|--------------------|--|--|
| Name | Department/Agency | Phone Number/Email |  |  |
|      |                   |                    |  |  |
|      |                   |                    |  |  |
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| Ordinance/Legal Authority  |          |          |          |
|--|----------|----------|----------|
| Interview Questions  | Response |          |          |
| Ordinance which requires industrial/commercial facilities to install BMPs or minimize pollutant discharge? | YES      | NC       | )        |
| Name and/or code section(s).   |          |          |          |
| Types of facilities covered:   |          |          |          |
| Facilities exempted:   |          |          |          |
| Applicable Documents   | 1        | Reviewed | Obtained |
| Ordinance(s)   | ·        |          |          |

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| Notes |
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| Facility Inventory                             |   |                     |                               |
|--|---|---------------------|-------------------------------|
| Interview Question                             | R   | esponse             |                               |
| Industrial/Commercial facilities inventoried?  | YES   | NO                  | C                             |
| Types of facilities included in the inventory: |   |                     |                               |
| Facilities prioritized according to risk?      | YES   | NO                  | O                             |
| Criteria used:                                 | Proximity to waterbe Waterbody impairme Type of facility Materials produced of Materials stored on- | ent Y. Y. on-site Y | ES NO ES NO ES NO ES NO ES NO |
| Facilities mapped? GIS?                        | YES<br>YES  | NO<br>NO            |                               |
| Applicable Documents                           | •   | Reviewed            | Obtained                      |
| Facility inventory                             |   |                     |                               |
| Facility map                                   |   |                     |                               |

| Notes |  |
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| Notes |
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| Standards, BMPs & Outreach   |      |      |
|--|------|------|
| Interview Questions  | Resp | onse |
| Standards adopted which require industrial/commercial facilities to install BMPs (e.g., all car dealerships must install a wash rack plumbed to the sanitary sewer)? | YES  | NO   |
| Describe:  |      |      |
| Standards for new development only or do they apply to improvements as well?   |      |      |
| Additional criteria which determine whether BMPs are required (e.g. facilities determined to be "high priority", facilities within 100 feet of stream):              |      |      |
| Specific guidance document or manual utilized:   |      |      |

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| Standards, BMPs & Outreach  |          |          |
|---|----------|----------|
| Interview Questions   | Response |          |
|   |          |          |
| Materials developed to educated operators about required or recommended BMPS: |          |          |
| Training for operators:   |          |          |
| Frequency of training:  |          |          |
| Applicable Documents  | Reviewed | Obtained |
| BMP standards or guidance document  |          |          |
| Outreach materials  |          |          |
|   | ·        | ·        |

| Notes |  |
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| Inspections  |     |       |
|--|-----|-------|
| Interview Questions  | Res | ponse |
| Industrial/Commercial facilities inspected?  | YES | NO    |
| Frequency:   |     |       |
| Staff (department or agency) responsible for inspections:  |     |       |
| If multiple departments perform inspections (i.e. health department inspects restaurants, pretreatment | YES | NO    |

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| Inspections   |  |           |           |
|---|--|-----------|-----------|
| Interview Questions   | Ro   | esponse   |           |
| staff inspects heavy industrial), are the stormwater findings compiled? |  |           |           |
| Checklist used during inspection?                                       | YES  | NO        | )         |
| Types of data collected:  | Proximity to waterboom Type of facility Materials produced on Materials stored on-si Hazardous waste on-si NOI submittal Other | n-site    |           |
| Are non-filers reported to permitting authority?                        | YES  | NO        | )         |
| Method of tracking inspection findings:                                 |  |           |           |
| Educational materials provided to operators during                      | YES  | NO        | )         |
| inspections?  |  | Daniana d | Ohtoine i |
| Applicable Documents  Example checklist                                 |  | Reviewed  | Obtained  |
| Example checklist   |  |           |           |
| Examples of outreach materials  |  |           |           |

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| Enforcem   | ent  |          |          |
|--|--|----------|----------|
| Interview Questions  | Re   | esponse  |          |
| Enforcement escalation plan or procedures adopted?   | YES  | NO       | )        |
| Can industrial/commercial inspectors administer enforcement actions?   | YES  | NO       | )        |
| If no, who can?  |  |          |          |
| If yes, what types of enforcement actions?   |  |          |          |
| Enforcement action is most commonly used:  |  |          |          |
| Enforcement actions tracked?   |  |          |          |
| How?   |  |          |          |
| Average number of enforcement actions (by type) issued in the previous year:   | Notices of Violations<br>Administrative fines<br>Civil penalties<br>Criminal penalties<br>Damage abatement<br>Other: | (NOV)    |          |
| Adequate legal authority and tools available to inspectors to enforce stormwater requirements at industrial/commercial facilities? |  |          |          |
| If no, how could the program be improved?  |  |          |          |
| Who does follow up on enforcement actions?   |  |          |          |
| Applicable Documents   |  | Reviewed | Obtained |
| Enforcement escalation plan or procedures  |  |          |          |

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| Staff Education ar   | nd Trainina |          |          |
| Interview Questions  |             | esponse  |          |
| Staff trained to inspect industrial/commercial facilities? | YES         | NC       | )        |
| *  |             |          |          |
|  |             |          |          |
| Frequency:   |             |          |          |
|  |             |          |          |
| Materials used to train staff:                             |             |          |          |
|  |             |          |          |
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|  |             |          |          |
|  |             |          |          |
| Applicable Decuments                                       |             | Paulawad | Ohtainad |
| Applicable Documents  Training materials                   |             | Reviewed | Obtained |
| Training materials   |             | Reviewed | Obtained |
|  |             | Reviewed | Obtained |
| Training materials Training records                        |             | Reviewed | Obtained |
| Training materials   |             | Reviewed | Obtained |
| Training materials Training records                        |             | Reviewed | Obtained |
| Training materials Training records                        |             | Reviewed | Obtained |
| Training materials Training records                        |             | Reviewed | Obtained |
| Training materials Training records                        |             | Reviewed | Obtained |
| Training materials Training records                        |             | Reviewed | Obtained |
| Training materials Training records                        |             | Reviewed | Obtained |
| Training materials Training records                        |             | Reviewed | Obtained |
| Training materials Training records                        |             | Reviewed | Obtained |

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### **Illicit Discharge Component Worksheet**

| Date of Evaluation    | Instructions: Use this worksheet as a guide for questioning MS4 staff and reviewing applicable documents. Keep in mind that additional questions may   |
|-----------------------|--|
| Evaluator Name, Title | be necessary based on local regulations, MS4 permit requirements, implementation strategies, or water quality issues. Remember to obtain copies of any |
| MS4 Permittee         | applicable documents or files which may assist in writing the MS4 evaluation report.   |

| Staff Interviewed |                   |                    |
|-------------------|-------------------|--------------------|
| Name              | Department/Agency | Phone Number/Email |
|                   |                   |                    |
|                   |                   |                    |
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| Ordinance/Legal Authority                                    |   |                                    |  |
|--|---|------------------------------------|--|
| Interview Questions  | Response  |                                    |  |
| Ordinance which prohibits illicit discharges?                | YES   | NO                                 |  |
| Name and/or code section(s).                                 |   |                                    |  |
| Exclusions (non-stormwater discharges) allowed:              |   |                                    |  |
| Types of enforcement mechanisms available:                   | Notices of Violations (NOV) Administrative fines Stop-work orders Civil penalties Criminal penalties Other: | YES NO YES NO YES NO YES NO YES NO |  |
| Official enforcement escalation plan or procedures in place? | YES   | NO                                 |  |

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| Applicable Documents                        | Reviewed | Obtained |
|---|----------|----------|
| Ordinance(s) prohibiting illicit discharges |          |          |
| Enforcement escalation plan or procedures   |          |          |

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| Dry-Weather Screening   |  |                            |  |
|---|--|----------------------------|--|
| Interview Question  | Response   |                            |  |
| Map of MS4 system complete?   | YES  | NO                         |  |
| If yes, hard copy or electronic?  |  |                            |  |
| Who can access the map and for what purpose?  |  |                            |  |
| Dry-weather field screening used to detect illicit discharges?                        | YES  | NO                         |  |
| Frequency and extent of field screening (i.e. 30 percent of major outfalls annually): |  |                            |  |
| Areas for screening prioritized?  | YES  | NO                         |  |
| Criteria used:  | Land use(s) in watershed<br>Waterbody impairment<br>Spills/Dumping incidents<br>Other: | YES NO<br>YES NO<br>YES NO |  |
| Checklist or reporting form utilized?   | YES  | NO                         |  |

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| Dry-Weather Screening   |     |           |          |  |
|---|-----|-----------|----------|--|
| Interview Question  |     | Response  |          |  |
| Dry-weather flows sampled and analyzed?                       | YES | N         | О        |  |
| Parameters:   |     |           |          |  |
| Dry-weather screening findings tracked?                       | YES | N         | О        |  |
| Database used?  | YES | NO        |          |  |
| Data tracked:   |     |           |          |  |
| Applicable Documents  |     | Reviewed  | Obtained |  |
| Summary of field screening findings from previous year        |     | 110010WCG | - Janieu |  |
| Written description of dry-weather field screening procedures |     |           |          |  |
| Checklist or reporting form                                   |     |           |          |  |

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| Investigation of Illicit Discharges |          |  |
|-------------------------------------|----------|--|
| Interview Questions                 | Response |  |
| Investigation procedure adopted?    | YES NO   |  |
| Summary of process used:            |          |  |

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| Investigation of Illicit Discharges    |   |  |
|--|---|--|
| Interview Questions                    | Response  |  |
|  |   |  |
| Staff (departments/agencies) utilized: |   |  |
| Enforcement mechanisms available:      | Notices of Violations (NOV) Administrative fines Civil penalties Criminal penalties Abatement charges for damage Other: |  |
| Applicable Documents                   | Reviewed Obtained   |  |

Investigation procedures

As a part of the audit, review complete paperwork trails for several illicit discharge events (including a spill and an unknown illicit discharge in the storm drain system). Determine if the full investigation process was documented and if adequate enforcement actions taken when required.

| Illicit Discharge Location or Case File Name #1: |     |    |
|--|-----|----|
| Summarize illicit discharge event:               |     |    |
| Full investigation process documented?           | YES | NO |
| Source determined?                               | YES | NO |
| Enforcement action taken?                        | YES | NO |
| Describe:  |     |    |
| Describe:  |     |    |

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| Illicit Discharge Location or Case File Name #1: |                    |     |
|--|--------------------|-----|
| Notes:   |                    |     |
|  |                    |     |
|  |                    |     |
|  |                    |     |
|  |                    |     |
|  |                    |     |
| Illicit Discharge Location or                    | Case File Name #2: |     |
| Summarize illicit discharge event:               |                    |     |
|  |                    |     |
|  |                    |     |
|  |                    |     |
|  |                    |     |
|  |                    |     |
|  |                    |     |
| Full investigation process documented?           | YES                | NO  |
| Source determined?                               |                    |     |
| Source determined?                               | YES                | NO  |
| Enforcement action taken?                        | ******             | 220 |
|  | YES                | NO  |
| Describe:  |                    |     |
|  |                    |     |
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| Notes:   |                    |     |
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| Public Awareness   |     |          |          |
| Interview Questions                                      |     | Response |          |
| Spill reporting hotline?                                 | YES | NC       | )        |
|  |     |          |          |
| Constitution the database and and                        | VEC | NC       | `        |
| Complaint tracking database or system?                   | YES | NC       | )        |
| Describe:  |     |          |          |
| Describe.  |     |          |          |
|  |     |          |          |
|  |     |          |          |
| Outreach materials used to educate public about illicit  |     |          |          |
| discharges:  |     |          |          |
|  |     |          |          |
|  |     |          |          |
|  |     |          |          |
|  |     |          |          |
| Subwatersheds or neighborhoods prioritized for           | YES | NC       | )        |
| outreach based on complaints or land use?                |     |          |          |
|  |     |          |          |
|  |     |          |          |
| A P. H. D.   |     | D        | 044      |
| Applicable Documents                                     |     | Reviewed | Obtained |
| Examples of outreach materials                           |     |          |          |
| Print out of complaint database or tracking system files |     |          |          |
| Notes  |     |          |          |
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| Notes                                      |     |          |          |
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| 6.11 D                                     |     |          |          |
| Spill Prevention & R Interview Questions   |     | esponse  |          |
| Spill response plan or procedures adopted? |     | es ponse |          |
|  | YES | NC       | )        |
| Who responds?                              |     |          |          |
| who responds:                              |     |          |          |
|  |     |          |          |
| Adequate equipment and training for staff? |     |          |          |
|  |     |          |          |
| Tracking of spills and response?           | YES | NC       | )        |
| Database used?                             |     |          |          |
| Database asea.                             |     |          |          |
| Applicable Documents                       |     | Reviewed | Obtained |
| Spill tracking system                      |     |          |          |
| Notes                                      |     |          |          |
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| Notes                                    |                               |             |          |
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|  |                               |             |          |
| Used Oil & Toxics                        | Managamant                    |             |          |
| Interview Questions                      |                               | esponse     |          |
| Types of waste managed:                  | Household Hazardou            |             |          |
|  | Used oil/filters<br>Batteries |             |          |
|  | Thermometers                  |             |          |
|  | White goods (e.g. ref         | rigerators) |          |
|  | E-waste (e.g. comput          | ers)        |          |
|  | Pharmaceuticals Paint         | _           |          |
|  | Other                         |             |          |
|  |                               |             |          |
| Describe public outreach materials used: |                               |             |          |
| Describe public outreach materials used. |                               |             |          |
|  |                               |             |          |
|  |                               |             |          |
|  |                               |             |          |
| Applicable Documents                     |                               | Reviewed    | Obtained |
| Outreach materials                       |                               |             |          |
| Note                                     | S                             |             |          |
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| Sanitary Sewer   | Discharges |          |          |
| Interview Questions  | F          | Response |          |
| Sanitary sewer systems evaluated to determine storm sewer cross-connections or overflow locations? | YES        | NO       | )        |
| Extent of infiltration and inflow into storm sewer system:   |            |          |          |
| Sewer spill and cleanup procedures in place?   | YES        | NO       | )        |
| Applicable Documents   |            | Reviewed | Obtained |
| Sewer spill and clean procedures   |            |          |          |
|  |            |          |          |
| Note:  |            |          |          |
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| Staff Education o  |            |          |          |
| Interview Questions  |            | Response |          |
| Staff trained to identify illicit discharges?  | YES        | NO       | )        |
|  |            |          |          |
| Frequency:   |            |          |          |
| 1  |            |          |          |
| Materials used to train staff:   |            |          |          |
|  |            |          |          |
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| Staff Education and Training |  |          |          |
|------------------------------|--|----------|----------|
| Interview Questions Re       |  | esponse  |          |
|                              |  |          |          |
| Applicable Documents         |  | Reviewed | Obtained |
| Training materials           |  |          |          |
| Training records             |  |          |          |

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#### **APPENDIX C - FIELD INSPECTION WORKSHEETS**

### Appendix C - Field Inspection Worksheets

This appendix includes the following four field inspection worksheets:

- MS4 Maintenance Facility Field Inspection Worksheet
- Construction Field Inspection Worksheet
- Industrial/Commercial Facility Field Inspection Worksheet
- Outfall Visual Field Inspection Worksheet

Use these field inspections sheets as you accompany MS4 staff on inspections of municipal facilities, construction sites and industrial/commercial facilities. In addition, the outfall visual field inspection worksheet can be used to assess the condition of an MS4's outfall(s), thereby giving an evaluator an indication of the quality of the MS4's maintenance program.

### **APPENDIX C - FIELD INSPECTION WORKSHEETS**

#### MS4 Maintenance Facility Field Inspection Worksheet

| Permittee:  |                   |  |
|---|-------------------|--|
| Address of facility:  | Size of facility: |  |
| Date of visit:  | Time of visit:    |  |
| Provide the name(s) and title(s) of permittee staff present                                     | during inspection |  |
| Name  | Title             |  |
|   |                   |  |
|   |                   |  |
|   |                   |  |
| Evaluator Ob  | servations:       |  |
| SWPPP or stormwater plan  |                   |  |
| Has the maintenance facility developed a SWPPP or stormwater plan?                              |                   |  |
| Does the plan include a site map, list of pollutant   |                   |  |
| sources, BMPs, and maintenance procedures?  |                   |  |
| Does the permittee conduct and document periodic  |                   |  |
| inspections of the facility?  |                   |  |
| Are storm drains labeled and free of debris?  |                   |  |
| Vehicle maintenance, fueling and washing  |                   |  |
| Are vehicle maintenance activities conducted in a   |                   |  |
| designated place not exposed to stormwater?   |                   |  |
| Are fueling stations properly designed with spill kits  |                   |  |
| nearby?   |                   |  |
| Are vehicles washed on-site? Is wash water  |                   |  |
| discharged to the MS4 or sanitary sewer?  |                   |  |
| Material storage  |                   |  |
| Are all materials that are potential stormwater contaminants stored under cover or in secondary |                   |  |
| containment?  |                   |  |
| Hazardous waste management  |                   |  |
| Are all hazardous materials properly labeled and  |                   |  |
| stored to prevent exposure to stormwater runoff?  |                   |  |
| Waste management  |                   |  |
| Are waste bins covered with waste properly disposed   |                   |  |
| in containers?  |                   |  |
| How is landscape waste stored?  |                   |  |
| Spill response  |                   |  |
| Does the facility have a spill response plan, and are   |                   |  |
| spill kits readily available?   |                   |  |
| Employee training   |                   |  |
| What type of stormwater training do maintenance staff   |                   |  |
| receive?  |                   |  |
| Notes or additional information:  |                   |  |
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### **APPENDIX C – FIELD INSPECTION WORKSHEETS**

#### **Construction Field Inspection Worksheet**

| Permittee:   |                              |             |  |
|--|------------------------------|-------------|--|
| Address of project:  | Size of project:             | NOI?        |  |
| Date of visit:   | Time of visit:               |             |  |
| Name of permittee's inspector(s):                          |                              |             |  |
| Provide the name(s) and title(s) of site superintendent or | contractor(s) present during | ginspection |  |
| Name   | Titl                         |             |  |
|  |                              |             |  |
|  |                              |             |  |
| Evaluator Ol   | servations:                  |             |  |
| Inspector Training/Knowledge                               |                              |             |  |
| Is the inspector knowledgeable about:                      |                              |             |  |
| <ul> <li>Erosion and sediment control BMPs,</li> </ul>     |                              |             |  |
| <ul> <li>Stormwater/pollution prevention BMPs,</li> </ul>  |                              |             |  |
| <ul> <li>Local stormwater requirements, and</li> </ul>     |                              |             |  |
| <ul><li>Legal authority (ordinances)?</li></ul>            |                              |             |  |
| Is the inspector familiar with the requirements in the     |                              |             |  |
| State stormwater construction general permit?              |                              |             |  |
| What type of stormwater training did the inspector         |                              |             |  |
| receive? When, and how often?                              |                              |             |  |
| Inspection Procedures                                      |                              |             |  |
| Is a checklist used during the inspection?                 |                              |             |  |
| Is the inspector aware of previous stormwater              |                              |             |  |
| inspection results at this site?                           |                              |             |  |
| Does the inspector review the approved plans (erosion      |                              |             |  |
| and sediment control and/or SWPPP) required to be at       |                              |             |  |
| the construction site?                                     |                              |             |  |
| Does the inspector walk the entire site and inspect all    |                              |             |  |
| points of discharge?                                       |                              |             |  |
| Does the inspection address:                               |                              |             |  |
| <ul> <li>Erosion control</li> </ul>                        |                              |             |  |
| o Sediment control   |                              |             |  |
| Waste management practices                                 |                              |             |  |
| Non-stormwater discharges?                                 |                              |             |  |
| Did the inspector miss obvious violations?                 |                              |             |  |
| Are inspection findings documented in writing and          |                              |             |  |
| presented to the site contact?                             |                              |             |  |
| Compliance/Enforcement                                     |                              |             |  |
| How does the inspector address compliance issues           |                              |             |  |
| (verbal warnings, NOV, stop work order, etc)?              |                              |             |  |
| If there are compliance issues identified, is a deadline   |                              |             |  |
| given for correction?                                      |                              |             |  |
| Education  |                              |             |  |
| Are any materials or brochures given to the site contact   |                              |             |  |
| to educate them about appropriate BMPs?                    |                              |             |  |

## **APPENDIX C - FIELD INSPECTION WORKSHEETS**

| Notes or additional information: |  |
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### **APPENDIX C – FIELD INSPECTION WORKSHEETS**

#### Industrial/Commercial Facility Field Inspection Worksheet

| Permittee:  |                           |      |
|---|---------------------------|------|
| Address and Name of facility:                                       | Size of project:          | NOI? |
| Date of visit:  | Time of visit:            |      |
| Name of permittee's inspector(s):                                   |                           |      |
| <b>Provide the name(s) and title(s) of facility representatives</b> | present during inspection |      |
| Name  | Title                     |      |
|   |                           |      |
|   |                           |      |
| Evaluator Ob  | servations:               |      |
| Inspector Training/Knowledge  |                           |      |
| Is the inspector knowledgeable about:                               |                           |      |
| <ul> <li>Source Control BMPs,</li> </ul>                            |                           |      |
| <ul> <li>Treatment Control BMPs,</li> </ul>                         |                           |      |
| <ul> <li>Local stormwater requirements, and</li> </ul>              |                           |      |
| <ul><li>Legal authority (ordinances)?</li></ul>                     |                           |      |
| Is the inspector familiar with the requirements in the              |                           |      |
| State stormwater industrial general permit?                         |                           |      |
| What type of stormwater training did the inspector                  |                           |      |
| receive? When, and how often?                                       |                           |      |
| Inspection Procedures   |                           |      |
| Is a checklist used during the inspection?                          |                           |      |
| Is the inspector aware of previous stormwater inspection            |                           |      |
| results at this site?   |                           |      |
| Does the inspector review the BMPs in the industrial                |                           |      |
| SWPPP (if available)?   |                           |      |
| Does the inspector walk the entire facility and inspect all         |                           |      |
| points of discharge?  |                           |      |
| Does the inspection address:  |                           |      |
| <ul> <li>Good housekeeping practices</li> </ul>                     |                           |      |
| <ul> <li>Spill prevention and response</li> </ul>                   |                           |      |
| Materials handling and storage                                      |                           |      |
| Waste management practices  |                           |      |
| Non-stormwater discharges?  |                           |      |
| Did the inspector miss obvious violations?                          |                           |      |
| Are inspection findings documented in writing and                   |                           |      |
| presented to the facility representative?                           |                           |      |
| Compliance/Enforcement  |                           |      |
| How does the inspector address compliance issues                    |                           |      |
| (verbal warnings, NOV, stop work order, etc)?                       |                           |      |
| If there are compliance issues identified, is a deadline            |                           |      |
| given for correction?  Education                                    |                           |      |
| Are any materials or brochures given to the facility                |                           |      |
| representative to educate them about appropriate BMPs?              |                           |      |
| representative to educate them about appropriate DMPs?              |                           |      |

## **APPENDIX C - FIELD INSPECTION WORKSHEETS**

| Notes or additional information: |  |
|----------------------------------|--|
|                                  |  |
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### **APPENDIX C – FIELD INSPECTION WORKSHEETS**

#### **Outfall Visual Field Inspection Worksheet**

| Background                             |                                     |                                 |                      |
|--|-------------------------------------|---------------------------------|----------------------|
| Permittee:                             |                                     | Date:                           | Time:                |
| Evaluator:                             |                                     | Predominant Water               | shed Landuse:        |
| Outfall Location:                      | (Latitude) (Long                    | gitude)/                        | (Address)            |
| Permittee Staff Interviewed:           |                                     |                                 |                      |
| Date Outfall Last Inspected by         | Permittee:                          | Days Since Last Rainfall        | Inches               |
| Photos Taken? Yes No Photos            | to #s:                              |                                 |                      |
| Outfall Description                    |                                     | 1                               |                      |
| End of Pipe Diameter                   | Outfall Submerged: Yes              | Pipe Material:                  | Pipe Condition:      |
| (feet/inches):<br>Open Channel? Yes No | No<br>If was in                     | Concrete                        | Good                 |
| Open Channel? Yes No                   | If yes, in:  Water                  | □ PVC                           | Fair                 |
| Shape:                                 | □ Fully                             | Steel                           | Poor                 |
| ☐ Circular                             | □ Partially                         | Other:                          | 5 "                  |
| ☐ Elliptical                           | Sediment                            |                                 | Describe:            |
| ☐ Box                                  | □ Fully                             |                                 |                      |
| ☐ Other:                               | - Partially                         |                                 |                      |
|  |                                     |                                 |                      |
| Visual Observations                    |                                     |                                 |                      |
| Flow Present: Yes No                   | Flow Color:                         | Debris in Pipe:                 | Flow Odor:           |
| Flow Volume:                           | ☐ Clear                             | None                            | None                 |
| Low                                    | ☐ Muddy                             | Sediment                        | Petroleum            |
| ☐ Moderate                             | ☐ Milky or cloudy                   | ☐ Trash                         | ☐ Sewage/rotten eggs |
| Heavy                                  | Sheen                               | ☐ Other:                        | ☐ Other:             |
| ☐ Intermittent                         | ☐ Soapy foam                        |                                 |                      |
|  | ☐ Other:                            |                                 |                      |
| Debris Around Outfall:  None           | Staining and Scum Present:  None    | Notes:                          |                      |
| ☐ Sediment                             | ☐ Red/Orange                        |                                 |                      |
| ☐ Trash                                | ☐ White                             |                                 |                      |
| Other:                                 |                                     |                                 |                      |
|  | Oily scum                           |                                 |                      |
|  |                                     |                                 |                      |
|  |                                     |                                 |                      |
| If flow is present, ask the f          | ollowing questions of the Perm      | nittee contact:                 |                      |
| 1. Has the outfall been inspec         | ted? Yes No If yes, when?           |                                 |                      |
| 2. Was there dry weather flow          | v during the last inspection? Yes ( | Go to Question # 3) No (Go to a | uestion # 6)         |

### **APPENDIX C – FIELD INSPECTION WORKSHEETS**

| 3. | Was there an investigation as to the source of the flow? Yes No If yes, describe the investigation.   |
|----|---|
| 4. | What was the outcome of the investigation?  |
| 5. | Does the permittee have documentation detailing the investigation and enforcement which resulted? Yes No Describe.  |
| 6. | What are the permittee's next steps regarding the flow discovered during the field inspection? Ask the permittee to describe, in detail, how the flow will be investigated including specific staff members responsible, time frames for action, etc. |
|    |   |
| 7. | If the source of the dry weather flow is determined, what enforcement actions will the permittee take against the person responsible?   |
| 8. | Are the actions described by the permittee contact confirmed in the Enforcement Response Plan? Yes No Describe.   |
| Ad | ditional Comments or Observations:  |
|    |   |

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# Appendix D – Reviewing an Annual Report

**Date of Evaluation** 

#### **Annual Report Evaluation Worksheet**

|   | Instructions: Use this worksheet as a guide when reviewing a permittee's annual report, as it highlights the  |
|---|---|
| Evaluator Name, Title                         | information most useful for assessing the permittee's level<br>of compliance. Keep in mind that additional information<br>may be necessary to determine compliance based on |
| MS4 Permittee                                 | specific local regulations, MS4 permit requirements, implementation strategies, or water quality issues.  |
|   |   |
|   | Management Component  |
| Name of department overseeing NPDES con       |   |
| Other departments involved in SWMP imple      | ementation:   |
| Other municipalities or agencies implementing | ng the SWMP:  |
| Name of umbrella organization, if any:        |   |
| SWMP or similar planning document?            |   |
| Stormwater task force or committee:           |   |
| Internal?                                     |   |
| Intergovernmental?                            |   |

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# **APPENDIX D: REVIEWING AN ANNUAL REPORT**

| Program Management Component                                |
|---|
| Specific measurable goals referenced?                       |
|   |
|   |
|   |
|   |
|   |
| Revisions to the SWMP noted?                                |
|   |
|   |
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| Water quality monitoring data (if any) analyzed for trends? |
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| Program effectiveness assessed?                             |
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| Notes   |
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## **APPENDIX D: REVIEWING AN ANNUAL REPORT**

| Public Education and Participation Component                        |
|---|
| Name of department overseeing public education and participation:   |
|   |
|   |
|   |
| T 1 1 10  |
| Is an outreach strategy developed?                                  |
|   |
|   |
|   |
| Specific stormwater messages used?                                  |
|   |
|   |
|   |
|   |
| Specific target audiences identified?                               |
|   |
|   |
|   |
| Behavior changes tracked?   |
| Behavior changes tracked:   |
|   |
|   |
|   |
| Stormwater hotline?   |
|   |
|   |
|   |
|   |
| Methods used to distribute messages (printed material, media, etc.) |
|   |
|   |
|   |
| Effectiveness of education activities evaluated?                    |
|   |
| Is a survey used?   |
|   |
|   |

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# **APPENDIX D: REVIEWING AN ANNUAL REPORT**

| Public Education and Participation Component |
|--|
| Changes to the outreach strategy noted?      |
|  |
|  |
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|  |
|  |
| Attendance at public involvement activities? |
| Attendance at public involvement activities: |
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| A., 1 C 1 , 0                                |
| Attendance for volunteer programs?           |
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| Public comments on the stormwater program?   |
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| Notes  |
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| MS4 Maintenance Component  |  |  |  |
|--|--|--|--|
| MS4 map or GIS?  |  |  |  |
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|  |  |  |  |
|  |  |  |  |
| Departments responsible for the following:                                       |  |  |  |
| Catch basin maintenance:   |  |  |  |
| Street sweeping:   |  |  |  |
| Storm drain pipe maintenance:  |  |  |  |
| Stormwater management structure maintenance:                                     |  |  |  |
| Open channel maintenance:  |  |  |  |
|  |  |  |  |
| Number or frequency of catch basin inspections/cleaning:                         |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
| Street sweeping frequency/miles:   |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
| Number or frequency of pipe inspections/cleaning:                                |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
| Number or frequency of inspections/cleaning of stormwater management structures: |  |  |  |
| Publicly owned:  |  |  |  |
| Privately owned:   |  |  |  |
|  |  |  |  |
| Frequency of open channel inspections/cleaning:                                  |  |  |  |
|  |  |  |  |
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| MS4 Maintenance Component   |
|---|
| Volume/weight of trash and debris removed from the MS4:               |
| Areas targeted for higher frequency of maintenance?                   |
| Maintenance data analyzed to modify schedules or gauge effectiveness? |
| Locations/amounts used for the following:                             |
| Deicing salts or abrasives?   |
| Pesticides?   |
| • Fertilizers?  |
| Inspections of municipal facilities?                                  |
| Inspection of maintenance yard(s)?                                    |
| Sanitary sewer overflow occurrences?                                  |
| Household hazardous waste collection:                                 |
| Number of events?   |
| Amounts collected?  |
| Number of participants?   |

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| M\$4 Maintenance Component Attendance at stormwater training for municipal staff? |
|---|
| Attendance at stormwater training for municipal staff?                            |
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| Construction Component   |  |  |
|--|--|--|
| Erosion and sediment control plan review   |  |  |
| Department responsible for plan review:  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
| Number of plans reviewed and/or approved:  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
| Size threshold or other criteria to trigger plan review:                                 |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
| Construction site inspections  |  |  |
| Department responsible for private construction inspections during the following phases: |  |  |
| • Grading phase:   |  |  |
|  |  |  |
| Building phase:  |  |  |
| Final inspection:  |  |  |
| Different department for public projects?  |  |  |
| If yes, which department?  |  |  |
|  |  |  |
|  |  |  |
| Number of inspectors who perform ESC inspections:  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
| Number of active construction projects requiring inspections:                            |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
| Frequency of routine inspections:  |  |  |
| a request, or resume inspections.  |  |  |
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| Construction Component                                   |  |  |
|--|--|--|
| Number of inspections performed (routine and follow-up): |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
| Name and Carlotte and Community                          |  |  |
| Number of violations found:                              |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
| Number of enforcement actions:                           |  |  |
|  |  |  |
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|  |  |  |
| Training   |  |  |
| Attendees at training for                                |  |  |
| Plan review staff:                                       |  |  |
| Erosion and sediment control inspectors:                 |  |  |
| Contractors and developers:                              |  |  |
| Notes  |  |  |
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| Post-Construction Component  |
|--|
| Postconstruction plan review   |
| Department responsible for postconstruction stormwater plan review:                    |
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|  |
| Ordinance governing postconstruction controls:   |
| 61   |
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|  |
| Number of plans submitted for review (private and public projects):                    |
| Trumber of plans submitted for review (private and public projects).                   |
|  |
|  |
|  |
| Number of also assistances   |
| Number of plan reviewers:  |
|  |
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|  |
|  |
| Size threshold for postconstruction stormwater plan review:                            |
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|  |
| BMP inspection and maintenance   |
| Department responsible for as-built certifications of structural stormwater BMPs:      |
|  |
|  |
|  |
|  |
| Department responsible for structural stormwater BMP maintenance (public and private): |
|  |
|  |
|  |
|  |
| Frequency of inspections/maintenance:  |
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| Post-Construction Component   |  |  |  |  |
|---|--|--|--|--|
| Party responsible for maintenance (permittee, owner, etc):          |  |  |  |  |
|   |  |  |  |  |
|   |  |  |  |  |
|   |  |  |  |  |
| Number of enforcement actions taken due to lack of BMP maintenance: |  |  |  |  |
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|   |  |  |  |  |
|   |  |  |  |  |
| Training  |  |  |  |  |
| Attendance at training for the following:                           |  |  |  |  |
| Plan review staff:  |  |  |  |  |
| Stormwater BMP inspectors:  |  |  |  |  |
| Developers, contractors, and engineers:                             |  |  |  |  |
| Notes   |  |  |  |  |
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| Industrial/Commercial Component   |
|---|
| Department(s) responsible for industrial/commercial stormwater inspections: |
|   |
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|   |
| Ordinance governing stormwater controls at businesses:                      |
|   |
|   |
|   |
| Inventory of industrial facilities?   |
| inventory of industrial racington.  |
|   |
|   |
|   |
| Number of industrial facilities:  |
|   |
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|   |
| Inventory of commercial facilities?   |
|   |
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|   |
| Number of commercial facilities:  |
| Trumber of commercial facilities.   |
|   |
|   |
|   |
| Number of inspectors:   |
|   |
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|   |
| Frequency of inspection:  |
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| Industrial/Commercial Component             |
|---|
| Number of violations found:                 |
|   |
|   |
|   |
|   |
| Number of follow-up inspections performed:  |
| Trained of follow up inspections performed: |
|   |
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| Number of enforcement actions:              |
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| Attendees at stormwater inspector training: |
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| Notes                                       |
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| Illicit Discharge Component  |  |  |
|--|--|--|
| Department responsible for illicit discharge complaint response and investigation: |  |  |
|  |  |  |
|  |  |  |
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|  |  |  |
| Ordinance(s) governing illicit discharges and illegal dumping:                     |  |  |
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| Calls to hotline:  |  |  |
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| Number of reported incidents (dry weather flows, illegal dumping, spills):         |  |  |
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| Source of incident report:   |  |  |
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| Number of incident responses:  |  |  |
| Trumber of mercent responses.  |  |  |
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| Number of enforcement actions:   |  |  |
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| Number of completed investigations and outstanding investigations:                 |  |  |
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| Amount of pollutants entering the MS4 and/or receiving waters:                         |
|--|
| Timount of pollutation entering the trib t and of feeerting waters.                    |
|  |
|  |
|  |
|  |
| Number of dry weather screening sites:   |
| Trained of dry weather selecting sites.  |
|  |
|  |
|  |
|  |
| Dry weather screening sites monitored each year:                                       |
|  |
|  |
|  |
|  |
|  |
| Data analysis performed?   |
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|  |
| Amount of storm drain system inspected:  |
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|  |
|  |
| Number of sanitary sewer overflows (including volume of sewage discharged to the MS4): |
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| Notes  |
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## **EXHIBIT G**

Pesticide, Herbicide and Fertilizer Application Plan

Contracted to private agency

## **EXHIBIT H**

Annual Checklist of BMPs



# **Draft Print**

06/30/2021 8:47:26 AM

# VILLAGE OF GRAFTON

| STORMWATER MANAGEMEN                 | NT PLAN ANNUAL CHECKLIST 2021 - 2026                     |
|--------------------------------------|--|
| Control Measure #1:                  | Public Education/Outreach                                |
| By December 2021                     |  |
| ☐ Legislation: Update Legisla        | tion to include new MS4 permit requirements              |
| ANNUAL CHECK LIST - 20               | 021 THROUGH 2026   |
| Distribute Brochures with 5          | 5 themes:  |
| 21 22 23 24 25 26                    |  |
|                                      | -  |
|                                      | posal of Oil, Grease, and Anti-freeze                    |
| •                                    | of Pest, Fert, and other HH hazardous wastes             |
|                                      | _  |
|                                      | n of Litter & Pet Waste Ord. & Recycling Schedule        |
| 2021 Total Number Sent               | notifications published                                  |
|                                      | notifications published                                  |
|                                      | notifications published                                  |
|                                      | notifications published                                  |
| 2025 Total Number Sent               | notifications published                                  |
| 2026 Total Number Sent               | notifications published                                  |
| A I DIKD                             |  |
| <b>Annual BMPs</b> 21 22 23 24 25 26 |  |
|                                      | Vebsite with school age-appropriate educational material |
| -                                    | Black River RAP Activity Schedule                        |
|                                      | ducation brochure or door hanger to businesses           |
|                                      | ducation prochare or door named to businesses            |
|                                      | <b>Meeting</b> – bi-annually discuss stormwater          |
|                                      | cluding Phosphorus impacts & reduction                   |
| □ □ □ □ □ Review al                  | ll BMPs for effectiveness                                |
|                                      | eping and Annual Report                                  |



STORMWATER MANAGEMENT PLAN ANNUAL CHECKLIST 2021 - 2026

Control Measure #2: Public Participation/Involvement

| ANN            | JAL CHECK LIST - 2021 THROUGH                                   | 2026                            |
|----------------|---|---------------------------------|
| <u>Partici</u> | pation Count Each Year:   |                                 |
| 2021           | Total Number of Public Meetings                                 | Total Attendees                 |
| 2021           | Total Number RAP events posted                                  | Total Attendees                 |
| 2021           | Total Number Trees Planted                                      |                                 |
|                |   |                                 |
| 2022           | Total Number of Public Meetings                                 | Total Attendees                 |
| 2022           | Total Number RAP events posted                                  | Total Attendees                 |
| 2022           | Total Number Trees Planted                                      |                                 |
| 0000           | Total Number of Public Meetings                                 | Total Attendees                 |
| 2023           | Total Number of Public Meetings  Total Number RAP events posted |                                 |
| 2023           | Total Number Trees Planted                                      | Total Attendees                 |
| 2023           | Total Number Trees Flamed                                       |                                 |
| 2024           | Total Number of Public Meetings                                 | Total Attendees                 |
| 2024           | Total Number RAP events posted                                  |                                 |
| 2024           | Total Number Trees Planted                                      |                                 |
|                |   |                                 |
| 2025           | Total Number of Public Meetings                                 | Total Attendees                 |
| 2025           | Total Number RAP events posted                                  | Total Attendees                 |
| 2025           | Total Number Trees Planted                                      |                                 |
|                |   |                                 |
| 2026           | Total Number of Public Meetings                                 |                                 |
| 2026           | Total Number RAP events posted                                  | Total Attendees                 |
| 2026           | Total Number Trees Planted                                      |                                 |
| Annu           | al BMPs   |                                 |
| 21 22          | 23 24 25 26   |                                 |
|                | $\square$ $\square$ $\square$ Village hosted recycling pickuj   | p (one time during the 5 years) |
|                | □ □ □ □ Information Center Brochures                            | available                       |
|                |   |                                 |
|                | □ □ □ □ Review all BMPs for effective                           | eness                           |
|                | □ □ □ □ Recordkeeping and Annual I                              | Report                          |
|                |   |                                 |

 $<sup>\</sup>sqrt{\ }$  All storm drains are required to be imprinted with "no dumping" or other stormwater related awareness message imprinted on all drain lids.



| 3 TORMWATER IN                | Management Plan Annual Checklist 2021 - 2026   |
|-------------------------------|--|
| Control Measu                 | re #3: Illicit Discharge Detection Elimination   |
| BY DECEMBER                   | 2021   |
| ☐ Legislation: U requirements | pdate Illicit Discharge ordinance to include new MS4 permit  |
| ANNUAL CHEC                   | K LIST - 2021 THROUGH 2026   |
| Distribute Brock              | hures with 5 themes:   |
| 21 22 23 24 25 2              | nures with 5 themes.   |
|                               | -  |
|                               | -  |
|                               | 26   |
|                               | 26  20% of Stormwater Mapping updated annually   |
|                               | 26  □ 20% of Stormwater Mapping updated annually □ Provide residents, businesses and employees educational material  |
|                               | 20% of Stormwater Mapping updated annually  ☐ Provide residents, businesses and employees educational material  ☐ Employee Training on illicit discharge detection/elimination   |
|                               | 20% of Stormwater Mapping updated annually  ☐ Provide residents, businesses and employees educational material  ☐ Employee Training on illicit discharge detection/elimination  ☐ Grease trap inspection               |
|                               | 20% of Stormwater Mapping updated annually  Provide residents, businesses and employees educational material  Employee Training on illicit discharge detection/elimination  Grease trap inspection  Outfall inspection |

### Provide Annual Count for each BMP:

| Measure                                    | 2021 | 2022 | 2023 | 2024 | 2025 | 2026 |
|--|------|------|------|------|------|------|
| Mapping Percentage                         |      |      |      |      |      |      |
| Education Material Provided                |      |      |      |      |      |      |
| Employees Trained                          |      |      |      |      |      |      |
| Outfall inspected (dry weather)            |      |      |      |      |      |      |
| Dry weather flows identified               |      |      |      |      |      |      |
| Illicit discharges reported to EPA         |      |      |      |      |      |      |
| Illicit connections identified & corrected |      |      |      |      |      |      |
| Illicit connections not corrected*         |      |      |      |      |      |      |
| Amount of hazardous waste collected        |      |      |      |      |      |      |
| Grease trap inspections                    |      |      |      |      |      |      |

<sup>\*</sup>see following page

## Village of Grafton - SWMP

## Record for Illicit Discharge Identified

| Date                                      |  |
|---|--|
| Weather Conditions                        |  |
| Location                                  |  |
| Estimate of volume (gpd)                  |  |
| Source (continuous/intermittent/one-time) |  |
| Туре                                      |  |
| Pollutants believed to be present         |  |
| Receiving surface water                   |  |
| Estimated schedule for elimination        |  |
| Management notified date & time:          |  |
| EPA Notification Date                     |  |
| (required within 24-hours):               |  |



| STORMWATER MANAGEMENT PLAN ANNUAL CHECKLIST 2021 - 2026   |
|---|
| Control Measure #4: Construction Site Runoff  |
| By December 2021  |
| □ Legislation: Review Construction Site Runoff and Sediment Control regulations and update the regulations and specifications to incorporate the new General Permit regulations – Village Ordinance 1050 and Zoning Ordinance Chapter 1295. |
| ☐ Develop Plan Review Checklist or adopt the suggested EPA checklist  |
| $\hfill \square$ Develop Site Inspection Checklist or adopt the suggested EPA checklist   |
| ANNUAL CHECK LIST - 2021 THROUGH 2026   |
| 21 22 23 24 25 26   |
| $\square \ \square \ \square \ \square \ \square$ Provide developers, contractors and design A/E with   |
| educational material on phosphorus reduction  |
| $\square$ $\square$ $\square$ $\square$ Review all BMPs for effectiveness   |
| □ □ □ □ □ Recordkeeping and Annual Report   |

### Provide Annual Count for each BMP:

| Measure  | 2021 | 2022 | 2023 | 2024 | 2025 | 2026 |
|--|------|------|------|------|------|------|
| Site Inspections (complete checklist for each) |      |      |      |      |      |      |
| SWP3 & Plans Reviewed                          |      |      |      |      |      |      |
| Violations Recorded                            |      |      |      |      |      |      |
| Site Inspection Citations Issued               |      |      |      |      |      |      |
| Enforcement Actions Taken                      |      |      |      |      |      |      |
| Complaints Received                            |      |      |      |      |      |      |
| Complaints Addressed (resolved)                |      |      |      |      |      |      |
| Brochures or educational material distributed  |      |      |      |      |      |      |



## VILLAGE OF GRAFTON

STORMWATER MANAGEMENT PLAN ANNUAL CHECKLIST 2021 - 2026

Control Measure #5:

Post-Construction Runoff Control

| BY DECEMBER 2021  □ Legislation: Review and update Ordinances, Zoning Ordinance Chapter 1295 and subdivision regulation including the requirement for OHCoooo5 Table 4b.  □ Implement long-term O&M Plan requirement.  □ Develop an inspection and maintenance schedule for each existing structures.  |  |             |            |            |             |          |  |  |  |
|--|--|-------------|------------|------------|-------------|----------|--|--|--|
| By December 2021   | By December 2021   |             |            |            |             |          |  |  |  |
| BY DECEMBER 2021  □ Legislation: Review and update Ordinances, Zoning Ordinance Chapter 1295 and subdivision regulation including the requirement for OHCoooo5 Table 4b.  □ Implement long-term O&M Plan requirement.  |  |             |            |            |             |          |  |  |  |
| •  | BY DECEMBER 2021    Legislation: Review and update Ordinances, Zoning Ordinance Chapter 1295 and subdivision regulation including the requirement for OHC00005 Table 4b.   Implement long-term O&M Plan requirement.   Develop an inspection and maintenance schedule for each existing structures.   Develop Annual Site Inspection Record/Checklist  BY DECEMBER 2022   Implement requirement for OHC00005 Table 4b.  ANNUAL CHECK LIST - 2021 THROUGH 2026 21 22 23 24 25 26 Review and Revise, if necessary, for post-construction control:   Standard drawings & specifications, and ordinances   Subdivision regulations.   Review inspection & maintenance reports to determine compliance with design and operational goals.   Provide information and encourage low impact development to developers and builders.   Review all BMPs for effectiveness.   Recordkeeping and Annual Report.    Annual Count for each BMP for Post-Construction Runoff:   Review all services   Recordkeeping and Annual Report.   Review all services   Recordkeepin |             |            |            |             |          |  |  |  |
|  |  |             |            |            |             |          |  |  |  |
| Legislation: Review and update Ordinances, Zoning Ordinance Chapter 1295 and subdivision regulation including the requirement for OHCoooo5 Table 4b.   Implement long-term O&M Plan requirement.   Develop an inspection and maintenance schedule for each existing structures.   Develop Annual Site Inspection Record/Checklist    BY DECEMBER 2022   Implement requirement for OHCoooo5 Table 4b.   |  |             |            |            |             |          |  |  |  |
| By December 2022   | Legislation: Review and update Ordinances, Zoning Ordinance Chapter 1295 and subdivision regulation including the requirement for OHC00005 Table 4b.   Implement long-term O&M Plan requirement.   Develop an inspection and maintenance schedule for each existing structures.   Develop Annual Site Inspection Record/Checklist  |             |            |            |             |          |  |  |  |
| ☐ Implement requirement t  |  |             |            |            |             |          |  |  |  |
| ANNUAL CHECK LIST -  | <b>2021</b> т  | HROUGI      | н 2026     | •          |             |          |  |  |  |
| 21 22 23 24 25 26 Review   | and Revis  | e, if neces | ssary, for | post-cons  | struction ( | control: |  |  |  |
| □ □ □ □ □ Standa   | rd drawing   | gs & speci  | fications, | and ordi   | nances      |          |  |  |  |
| □ □ □ □ □ Subdiv   | ision regul  | ations.     |            |            |             |          |  |  |  |
| □ □ □ □ □ Review   | Review inspection & maintenance reports to determine   |             |            |            |             |          |  |  |  |
| compli   | ance with o  | design an   | d operatio | onal goals | S.          |          |  |  |  |
| $\square$ $\square$ $\square$ $\square$ $\square$ Provide  | e informati  | ion and e   | ncourage   | low impa   | ct develop  | oment    |  |  |  |
| BY DECEMBER 2021    Legislation: Review and update Ordinances, Zoning Ordinance Chapter 1295 and subdivision regulation including the requirement for OHCoooo5 Table 4b.   Implement long-term O&M Plan requirement.     Develop an inspection and maintenance schedule for each existing structures.     Develop Annual Site Inspection Record/Checklist  BY DECEMBER 2022   Implement requirement for OHCoooo5 Table 4b.  ANNUAL CHECK LIST - 2021 THROUGH 2026  21 22 23 24 25 26 Review and Revise, if necessary, for post-construction control:   Standard drawings & specifications, and ordinances   Subdivision regulations.   Review inspection & maintenance reports to determine compliance with design and operational goals.   Provide information and encourage low impact development to developers and builders.   Review all BMPs for effectiveness.   Recordkeeping and Annual Report.    Owide Annual Count for each BMP for Post-Construction Runoff:   Pareiweed   Provide information controls   Pareiweed   Provide information   Provide infor |  |             |            |            |             |          |  |  |  |
|  | all BMPs   | for effecti | iveness.   |            |             |          |  |  |  |
| □ □ □ □ □ Record   | keeping ar   | nd Annua    | l Report.  |            |             |          |  |  |  |
| Provide Annual Count for each RMP for Pos  | st-Constru   | ction Rur   | off.       |            |             |          |  |  |  |
|  |  |             |            | 2024       | 2025        | 2026     |  |  |  |
| Sites requiring post-construction controls   |  |             |            |            |             |          |  |  |  |
| SWP3 reviewed  |  |             |            |            |             |          |  |  |  |
|  |  |             |            |            |             |          |  |  |  |
| Enforcement actions for failure to maintain  |  |             |            |            |             |          |  |  |  |
| Long-term O&M & Agreements executed for post-construction controls   |  |             |            |            |             |          |  |  |  |
| tes requiring post-construction controls  VP3 reviewed spection verifying post-construction control ere built per requirements str-construction controls   |  |             |            |            |             |          |  |  |  |

**Public** Private



STORMWATER MANAGEMENT PLAN ANNUAL CHECKLIST 2021 - 2026

| Control Measure #6: | Good Housekeeping |
|---------------------|-------------------|
|---------------------|-------------------|

| ANNUAL CHECK LIST - 2021 THROUGH 2026 |  |  |  |  |
|---------------------------------------|--|--|--|--|
| 21 22 23 24 25 26                     |  |  |  |  |
|                                       | Employee Training (these can be combined)            |  |  |  |
|                                       | Oil Recycling.                                       |  |  |  |
|                                       | Provide information to residents on illegal dumping. |  |  |  |
|                                       | Clean 20% of storm drains each year.                 |  |  |  |
|                                       | Annual street sweeping.                              |  |  |  |
|                                       | Annual leaf pickup                                   |  |  |  |
|                                       | Review all BMPs for effectiveness.                   |  |  |  |
|                                       | Recordkeeping and Annual Report.                     |  |  |  |

#### Provide Annual Count for each BMP:

| 110 140 1411441 00 4411 01 04011 2111 1      |      |      |      |      |      |      |
|--|------|------|------|------|------|------|
| Measure                                      | 2021 | 2022 | 2023 | 2024 | 2025 | 2026 |
| Employee Training:                           |      |      |      |      |      |      |
| Illicit Discharge detection and elimination  |      |      |      |      |      |      |
| Phosphorus impact and reduction              |      |      |      |      |      |      |
| Handling and storage of hazardous products   |      |      |      |      |      |      |
| Pesticides and safe lawn care techniques     |      |      |      |      |      |      |
| Vehicle maintenance pollution prevention     |      |      |      |      |      |      |
| Amount of Oil Recycled                       |      |      |      |      |      |      |
| Percentage of Storm Drains Cleaning (20%)    |      |      |      |      |      |      |
| Amount collected from street sweeping        |      |      |      |      |      |      |
| Amount of leaves collected                   |      |      |      |      |      |      |
| Number of street sweepings                   |      |      |      |      |      |      |
| Amount of Pesticides Used                    |      |      |      |      |      |      |
| Amount of Fertilizer Used                    |      |      |      |      |      |      |
| Amount of Road Salt Used                     |      |      |      |      |      |      |
| Number of Residents reached for illegal dump |      |      |      |      |      |      |